Instructions: 2025 Antiques AML/CFT/CPF Survey

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

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

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

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

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

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Glossary

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

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

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

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

Instructions, Inherent Risk

Q#	Question Text	Instructions
1 Customer Risk		
1.1 Subject To Law n° 1.362		
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?	**Subject Activities:** 16°) Traders and persons who negotiate or act as intermediaries in the trade of works of art and antiques, including when this trade is carried out by art galleries. **Only when the value of the transaction or a series of related transactions is equal to or greater than €10,000.** Link
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	Under what conditions does your entity record the nationality of the client?	
Q6	Please provide the total number of transactions (both incoming and outgoing) with clients within the reporting period.	This value will be validated against other responses provided to later questions for numbers of transactions with Natural Persons, Legal Persons, Trusts, and Other Legal Arrangements, which are mutually exclusive.
Q7	Please provide the total value of funds transferred with clients (both incoming and outgoing) within the reporting period.	Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive.

Q#	Question Text	Instructions
1.3 Beneficial Owners		
Q8	Does your entity record Beneficial Owner information for some or all transactions?	Information relating to beneficial owners: identification details, addresses, etc.
Q9	For what transaction conditions does your entity record Beneficial Owner information?	
Q10	Please provide the total number of unique beneficial owners that were at some point active during the reporting period.	The complete concept of beneficial owner is referred to in Article 14 of OS No. 2.318, as amended, which can be identified by: • Their direct or indirect control (by any means other than holding capital or voting rights, i.e. control over the capital or the management, administrative or executive bodies of the company or over the general meeting of its shareholders or the natural person); • The representative of the company when no natural person could be identified according to the criteria set out in (a) the manager(s) of SNCs, SCSs, SARLs, CSAs and civil companies; (b) the managing director or chief executive officer of public limited companies; c) the trustee appointed in the context of legal proceedings for cessation of payments, judicial settlement or liquidation of assets). • Their direct or indirect ownership (at least 25% of the capital or voting rights of the legal entity).
Q11	Can your entity distinguish nationality of clients' BO's?	Indicate whether or not your entity is able to make the distinction.
Q12	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.
Q13	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.
Q14	Please provide the total number of Beneficial Owners that **represent a legal entity**, broken down by primary nationality.	
Q15	Can your entity distinguish BO's that have 25% or greater ownership?	
Q16	Please provide the total number of Beneficial Owners **with 25% or greater ownership**, by primary nationality.	

Q#	Question Text	Instructions
		If the nationality is unknown, please select 'Unknown' from the drop-down list.
Q17	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q18	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.	
Q19	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 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q20	Trusts?	Indicate whether or not your entity is able to identify and record information on the types of customers targeted below (trusts, associations, other legal structures, HNWIs). This question aims to determine what your entity is capable of doing, regardless of whether you currently have such clients.
Q21	Associations?	
Q22	Other Legal Arrangements not mentioned above?	
Q23	HNWI's?	
1.5 Clients - Natural Persons		
Q24	Does your entity have clients that are Natural Persons?	
Q25	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual (including domestic clients).	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person **should not** be counted as a Natural Person client. If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different. Example: • Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese • Individuals broken down by residence: 2 clients → 2 residents of Monaco The total number remains the same: 2 clients.
Q26	# Natural Person Customers	**Auto-calculated**
Q27	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
Q28	# Natural Person Customers	**Auto-calculated**
Q29	Difference between Total by Nationality and Total by Residency.	**Validate your inputs**, when correctly entered, the total between these should be '0'.
Q30	Please provide the total number of transactions with clients that are Natural Persons, both incoming and outgoing.	

Q#	Question Text	Instructions
Q31	Please provide the total value of funds transferred with clients that are Natural Persons, both incoming and outgoing.	
1.6 Clients - Legal Persons		
Q32	Does your entity have clients that are Legal Persons?	
Q33	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q34	Please provide the total number of transactions (both incoming and outgoing) with clients that are Legal Persons.	
Q35	Please provide the total value of funds transferred with clients that are Legal Persons, both incoming and outgoing.	
Q36	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	• Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts • Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q37	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.7 Clients - Trusts		
Q38	Does your entity have clients that are Trusts?	
Q39	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q40	Does your entity have information related to the number and value of their transactions?	
Q41	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
Q42	Please provide the total value of funds transferred with clients that are Trusts, (both incoming and outgoing).	
Q43	Please provide the total number of Monegasque unique clients that are Trusts.	
Q44	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	

Q#	Question Text	Instructions
Q45	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.	
1.8 Clients - Associations		
Q46	Does your entity have clients that are Associations?	
Q47	Please provide the total number of unique clients that are Associations, broken down by country of Associations formation.	
Q48	Does your entity have information related to the number and value of their transactions?	
Q49	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
Q50	Please provide the total value of funds transferred with clients that are Associations, (both incoming and outgoing).	
1.9 Clients - Other Legal Arrangements		
Q51	Does your entity have clients that are Other Legal Arrangements?	
Q52	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q53	Does your entity have information related to the number and value of their transactions?	
Q54	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
Q55	Please provide the total value of funds transferred with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q56	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		
Q57	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. A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories.
Q58	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).	
Q59	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.** A UNHWI is necessarily an HNWI. In STRIX, a UNHWI must be counted in both the HNWI and UHNWI categories.

Q#	Question Text	Instructions
Q60	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.	
1.11 Politically Exposed Persons (PEPs)		
Q61	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
Q62	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q63	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q64	Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs.	
Q65	Please provide the total value of funds transferred with clients that are PEPs, both incoming and outgoing.	
Q66	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q67	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.
Q68	Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
Q69	Please provide the total value of funds transferred (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
1.12 Comments & Feedback		
Q70	Do you have feedback related to any questions in this section?	
Q71	Please provide comments or feedback on this section here.	

Q#	Question Text	Instructions
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.		
Q72	Does your entity accept or make Cheque transactions with clients?	
Q73	Did your entity accept or make payments by Cheque with clients within the reporting period?	
Q74	Please provide the total number of Cheque transactions with clients (both incoming and outgoing).	
Q75	Please provide the total value of Cheque transactions with clients (both incoming and outgoing) within the reporting period.	
2.2 Direct Payments with Clients - Electronic Transfers		
Q76	Does your entity accept or make Electronic Transfers with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, payment service provider (PSP) such as PayPal, debit cards, credit cards, virtual currency payments, etc.
Q77	Did your entity accept or make payments by Electronic Transfers with clients within the reporting period?	
Q78	Please provide the total number of Electronic Transfers with clients (both incoming and outgoing).	
Q79	Please provide the total value of Electronic Transfers with clients (both incoming and outgoing) within the reporting period.	
Q80	Does your entity accept Credit Card transactions with clients?	
Q81	Did your entity accept or make payments by Credit Card with clients within the reporting period?	
Q82	Among the electronic transfers reported, please indicate the total number of Credit Card transactions with clients, both incoming and outgoing.	
Q83	Total number of Electronic Transfers	**Auto-calculated**
Q84	Please provide the total value of Credit Card transactions with clients, within the reporting period.	
Q85	Total value of Electronic Transfers	**Auto-calculated**
2.3 Direct Payments with Clients – Cash		
Q86	Does your entity accept or make Cash transactions with clients?	
Q87	Did your entity accept or make Cash payments with clients within the reporting period?	
Q88	Please provide the total number of Cash transactions with clients, within the reporting period.	
Q89	Please provide the total value of funds transferred, Cash payments in the reporting period, with clients both incoming and outgoing.	

Q#	Question Text	Instructions
Q90	Please provide the total value of funds transferred with clients, cash payments in currencies other than Euro, during the reporting period, both incoming and outgoing.	
Q91	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.	
Q92	Did your entity make cash transactions with clients for Precious Metals and Stones?	
Q93	Please provide the total number of Cash transactions with clients (both incoming and outgoing) of Precious Metals and Stones.	
Q94	Please provide the total value of funds transferred with clients, Cash payments, both incoming and outgoing of Precious Metals and Stones.	
Q95	Can your entity distinguish cash transactions with clients above EUR 100,000 in your record keeping?	
Q96	Number of physical cash transactions with Natural Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q97	Number of physical cash transactions with Monegasque Legal Persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
Q98	Number of physical cash transactions with foreign legal persons in excess of EUR 100,000 within the reporting period, both incoming and outgoing.	
2.4 Direct Payments with Clients – Other Payment Form		
Q99	Does your entity use any other payment types?	
Q100	Which other payment types?	
Q101	Please provide the total number of other transactions types with clients, within the reporting period.	
Q102	Please provide the total value of other transactions types with clients, within the reporting period.	
2.5 Direct Payments with Clients – Summary		
Q103	Sum of # Transactions with clients	Auto-calculated field
Q104	# Transactions with clients (Repeat of Q6)	Repeat field, used for data validation
Q105	Sum of Value Transactions with clients	Auto-calculated field
Q106	Value Transactions with clients (repeat of Q7)	Repeat field, used for data validation
2.6 Virtual Currencies		
Q107	Do you have clients that use cryptocurrencies?	In any of the following forms: I) Your entity accepts and/or makes transactions from/to clients in Virtual Assets II) Your entity invests in Virtual Assets or VASPs either itself or on behalf of the client
Q108	Please provide the total number of Virtual Assets transactions with clients (both incoming and outgoing).	
Q109	Please provide the value of funds transferred with clients using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	

Q#	Question Text	Instructions
		This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
Q110	Does your entity plan to be active in, or offer products and services in, Virtual Assets in the next year?	The reporting entity should declare whether it intends to be active or offer products and services relating to virtual assets in the following years, accept or make payments to/from customers, or invest in virtual assets.
Q111	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q112	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	
2.7 Products & Services		
Q113	What is the proportion of transaction value that is with occasional customers?	
Q114	Does your entity deal in Precious Metals and Stones?	
Q115	Please provide the total number of transactions (both bought and sold) related to dealings of Precious Metals and Stones.	
Q116	Please provide the total value of funds transferred, both buying and selling, related to dealings of Precious Metals and Stones.	
Q117	How many goods were sold within the reporting period?	
Q118	Value of goods sold within the reporting period.	
Q119	Does your entity perform auctioning related services?	
Q120	How many goods were auctioned within the reporting period?	
Q121	Number of incoming transactions, related to auctioning services, by originating country.	
Q122	Value of incoming transactions, related to auctioning services, by originating country.	
Q123	Number of outgoing transactions, related to auctioning services, by destination country.	
Q124	Value of outgoing transactions, related to auctioning services, by destination country.	
Q125	Does your entity function as an agent for auctions houses?	
Q126	Which auction house(s)?	
Q127	Does the entity specialize in a specific set of goods?	
Q128	Which goods?	
2.8 Lending		
Q129	Does your entity propose and facilitate lending or credit to clients?	
Q130	With which companies does the entity work with for providing lending and credit facilities?	
Q131	Please provide the total number of loans provided to clients.	

Q#	Question Text	Instructions
Q132	Please provide the total value of loans provided to clients.	
Q133	Does your entity have any Other Loan Products, not mentioned above, that it offers to clients?	
Q134	Please specify the type of Other Loan Products at your entity not mentioned above it offers to clients.	
2.9 Comments & Feedback		
Q135	Do you have feedback related to any questions in this section?	
Q136	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q137	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.
Q138	Please provide the total number of clients which Domestic Third Parties were used to undertake some/all CDD measures within the reporting period, broken down by primary nationality of the client.	
Q139	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q140	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.
Q141	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		
Q142	Did your entity onboard clients within the reporting period?	These questions refers to new unique clients who entered into a relationship during the reporting period. New clients are those who were not clients during the previous reporting period.
Q143	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded within the reporting period.	
Q144	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded within the reporting period.	
Q145	Please provide the number of new unique clients, that are Trusts, that have been onboarded within the reporting period.	
Q146	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded within the reporting period.	
Q147	Does your entity onboard clients on a non-face-to-face basis, i.e. not physically present?	

Q#	Question Text	Instructions
Q148	Please provide the number of new unique clients, that are Natural Persons, that have been onboarded Non-face-to-face for CDD purposes.	This section indicates whether the entity agrees to establish a relationship without a physical meeting with the client.
Q149	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	
Q150	Please provide the number of new unique clients, that are Trusts, that have been onboarded Non-face-to-face for CDD purposes.	
Q151	Please provide the number of new unique clients, that are other Legal Arrangements, that have been onboarded Non-face-to-face for CDD purposes.	
Q152	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.
Q153	Can the entity provide client nationality information for clients onboarded through introducers?	
Q154	Can the entity provide introducers residency information?	
Q155	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.
Q156	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.
Q157	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.**

Q#	Question Text	Instructions
	3.3 Structure	
Q158	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 • 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	
Q159	Please provide the total number of employees of the licensed domestic entity, including all staff working at the entity and managing partners, 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.
Q160	Does your entity have any Branches, Subsidiaries, or Agencies?	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".
Q161	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q162	Is your entity a Branch or Subsidiary of another entity?	
Q163	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q164	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q165	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q166	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)	
Q167	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.	
Q168	Is your entity part of an international business network or group?	
Q169	If so, please specify.	

Q#	Question Text	Instructions
Q170	Is your entity a member of a professional association or society?	
Q171	If so, please specify.	
Q172	Do you work with agents located abroad?	
Q173	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/CPF responsible persons?
Q174	Please indicate the development or modification.	
3.4 Entity Finances		
Q175	Turnover for the reporting period.	
Q176	Turnover for the reporting period realized in the Principality of Monaco.	
Q177	Turnover for the reporting period realized outside the Principality of Monaco.	
Q178	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		
Q179	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q180	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period.	
3.6 Terminated Relationships		
Q181	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q182	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
3.7 Comments & Feedback		
Q183	Do you have feedback related to any questions in this section?	
Q184	Please provide comments or feedback on this section here.	

Instructions, Controls

C#	Question Text	Instructions
Controls		
1.1 Structure		
C1	Veuillez indiquer le nombre total de personnes salariées et non salariées au sein de votre entité à la fin de la période de déclaration, incluant le cas échéant les gérants, associés ou propriétaires exploitants.	**Repeat the response from Q162.** 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	Prière d'indiquer le nombre total de personnes équivalents temps plein qui travaillent au sein de votre entité, à la fin de la période de déclaration.	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	Prière d'indiquer le nombre de personnes en charge de la conformité LCB/FT-P-C au sein de votre entité, à la fin de la période de déclaration.	
C4	Prière d'indiquer le nombre total de personnes équivalents temps plein qui sont en charge de la conformité LCB/FT-P-C, à la fin de la période de déclaration.	
C5	Approximativement, combien d'heures sont consacrées à la conformité LCB/FT-P-C par mois ?	
C6	Votre entité fait-elle partie d'un groupe ?	
C7	Votre entité dispose-t-elle d'un conseil d'administration et/ou d'une haute direction ?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance Examples of an entity that does not have a board or senior management:

C#	Question Text	Instructions
		• A sole proprietor • A partnership • A small business with a single layer of management
C8	Faites-vous appel à des prestataires externes en matière de LCB/FT-P-C ?	
C9	Quelle est la finalité de votre contrat avec ces prestataires externes ?	
C10	Veuillez indiquer le nombre exprimé en « équivalents temps plein » (ETP) de prestataires externes LCB/FT-P-C au sein de votre entité à la fin de la période de déclaration.	
C11	Approximativement, combien d'heures sont consacrées à la conformité LBC/FT-P-C par mois par les prestataires externes ?	
1.2 Policies & Procedures		
C12	Did your entity prepare a documented set of AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT/CPF legal requirements.
C13	Were these policies and procedures approved by the board and/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
C14	Does your entity have Policies and Procedures to refuse goods for reasons of suspicion of ML/TF?	
C15	For what reasons are goods or clients refused for suspicion of ML/TF?	
C16	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C17	Did your entity ensure awareness of these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C18	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C19	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C20	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT/CPF Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
C21	Does your entity have a group-wide AML/CFT/CPF program?	
C22	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF program complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	

C#	Question Text	Instructions
C23	Who prepared your Entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C24	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C25	Under art. 33 did you establish internal procedures and did you establish and communicate the report referred to in article 33, L. n° 1.362 ? (except for 15, 15 bis, 15 ter of art. 1 L. n° 1.362)	
C26	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C27	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C28	Does the board and/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.

C#	Question Text	Instructions
C29	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.
C30	Does the board and/or senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?	The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT/CPF compliance areas and mitigate ML/TF risks. The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT/CPF reporting, supervisory onsite examination reports, etc. Examples of such actions might include: (a) approving budgetary resources to hire more employees for AML/CFT/CPF Compliance, investing in employees' knowledge and expertise through training, seminars, certifications (b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions, (c) prioritizing AML/CFT/CPF area for internal audit, etc.
C31	Does the senior management of your entity review (give approval) for taking on high-risk clients?	In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
C32	Has your entity had any AML/CFT/CPF related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years.
C33	Please provide the total number of AML/CFT/CPF related violations in the past 5 Years.	Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question.
C34	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C35	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C36	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	

C#	Question Text	Instructions
C37	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C38	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C39	Please provide the total number of employees trained on AML/CFT/CPF matters in Reporting Cycle.	
C40	Are employees required to participate in AML/CFT/CPF training prior to their assignment to customer-facing or other duties of relevance for AML/CFT/CPF?	
C41	Provide the estimated average number of hours per person spent on Initial Training.	
C42	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters within the reporting period.	
C43	Did any of the AML/CFT-CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C44	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C45	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C46	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C47	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C49	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C50	What other AML/CFT/CPF training/awareness raising activities did it include?	
C51	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C52	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C53	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C54	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C55	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C56	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	

C#	Question Text	Instructions
C57	Did any of the AML/CFT/CPPF training/awareness raising activities cover topics related to News?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C62	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C63	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C64	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C65	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.6 CDD		
C66	Does your entity identify all customers regardless of payment method?	
C67	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	
C68	Please specify which items are not collected.	
C69	When the client transaction is by an individual, does your entity record the individual's Identity Card?	
C70	When the client transaction is by an individual, does your entity record the individual's Passport?	
C71	When the client transaction is by an individual, does your entity record the individual's Residence Card?	
C72	When the client transaction is by an individual, does your entity record the individual's Proof of Address?	
C73	When the client transaction is by an individual, does your entity record any other data of the individual?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such

C#	Question Text	Instructions
		as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?
C74	Please specify other data of Individual recorded.	
C75	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
C76	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
C77	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	
C78	When the transaction is by a Legal Person/Legal Arrangement, does your entity record the client's identity documents of all effective Beneficial Owners (owning 25% or more of the entity)?	
C79	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data?	
C80	Please specify other data of Legal Persons / Legal Arrangements recorded.	
C81	Does the entity's database contain all of the following, when applicable:	
C82	Please specify which items are not collected.	
C83	Does your entity record other client information or register client activity information in their database?	
C84	Please specify what other information is included in your database.	
C85	Does your entity research clients on the Internet?	
C86	Does your entity research client using the Journal de Monaco?	
C87	Does your entity research client using sites specializing in services of risk detection?	
C88	Does your entity research client using business websites?	
C89	Does your entity research client's organization, board members, etc.?	
C90	Does your entity research clients in the press?	
C91	What other information is used to research the client?	
C92	Are the results of the research systematically recorded?	

C#	Question Text	Instructions
C93	Is past 5 years of client relationship data accessible by AMSF upon request?	
C94	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C95	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C96	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	Law No. 1.362, as amended, sets a threshold of 25% ownership above which a person is automatically considered a beneficial owner. So, what is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity? It may be lower than the legal threshold, depending on your risk appetite.
C97	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C98	Does your entity have policies and procedures that specify the difference in documentation and requirements for different levels of CDD?	(e.g. simplified, standard and enhanced due diligence)
C99	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.	**Please repeat the answer provided in Q4**.
C100	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C101	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C102	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C103	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C104	Did you select "Trigger Event" in the previous question?	
C105	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
C106	Does your entity examine the source of wealth before customer take-on?	
C107	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C108	Please specify other measures taken for high-risk clients, before customer take-on.	
C109	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C110	How does the company verify the Beneficial Owners of Virtual Assets?	If not applicable, state 'NA'.
C111	Does your entity ever rely on third parties to collect CDD information about clients?	Third parties means any other entity / service provider which performs elements of CDD on behalf of the entity.

C#	Question Text	Instructions
C112	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?	
C113	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).	
C114	Does the evolution of the clients services requested contribute to the identification of red flags?	
	1.7 EDD	
C115	Did you apply enhanced due diligence measures to clients during the reporting period?	
C116	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C117	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C118	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.
C119	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C120	Please provide the percentage of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	i.e. number of enhanced due diligence Beneficial Owners of Legal Persons and Legal Arrangements ÷ total number of Beneficial Owners of Legal Persons and Legal Arrangements.
	1.8 Risk Assessments	
C121	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C122	How many AML/CFT/CPF risk levels does your entity have for clients?	
C123	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C124	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C125	Do you have clients whose risk level has not yet been determined?	
C126	Please provide the total number of unique clients that are without a risk level determined yet.	
C127	Does your entity's High-Risk assignment considerations include ALL of the following: • Country of Residence • Activity • PEP status • Type of Customer • Products & Services • Transaction Types	

C#	Question Text	Instructions
	• Distribution Channels • Accounts with Conventional Title • Assets Under Management • Volume of Operations • Nature of Operations • Trigger Events	
C128	Please specify which items are not considered?	
C129	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C130	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C131	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C132	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C133	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C134	What client activities does your entity associate with High-Risk clients?	
C135	Does your entity consider ML and TF risks separately?	(entity's own assessment)
C136	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
1.9 Audit / Controls		
C137	When did your entity last have a SICCFIN/AMSF audit?	
C138	Has your entity had an on-site AMSF audit?	
C139	Date of last AMSF on-site audit.	
C140	Did your entity have any Other Audits not mentioned above?	(AML/CFT/CPF related audits only)
C141	Specify the types of Other Audits, and provide the year of the last audit of each kind.	(AML/CFT/CPF related audits only)
1.10 Cash Transactions		
C142	Does the headquarters of your entity or any branches or subsidiaries conduct cash transactions with clients?	Both incoming and outgoing payments.
C143	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C144	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Monitoring		
C145	Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions?	All entities subject to these requirements are required to monitor their operations in order to detect any suspicious activity. This monitoring must be tailored to the nature and activity of the entity; it may be carried out using an automated system (e.g., an automatic tool) or a manual system (e.g., an Excel tracking file).

C#	Question Text	Instructions
		Only certain entities strictly referred to in Article 28 of Sovereign Order No. 2.318, as amended, are required to implement an automated monitoring system. If you have not implemented a transaction monitoring system, please indicate the reason in the comment field at the bottom of this section.
C146	Please provide the total number of transactions (both incoming and outgoing) by clients within the reporting period.	**Please repeat the answer provided in Q6.**
C147	Do you have a system that generates alerts related to Money Laundering?	
C148	Please provide the total number of Alerts in reporting period by the system related to Money Laundering.	
C149	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C150	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C151	Do you have a system that generates alerts related to Terrorism Financing?	
C152	Please provide the total number of Alerts in reporting period by the system related to Terrorism Financing.	
C153	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C154	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
C155	Has your entity formalized and used the identification thresholds required by your sector?	
C156	Does your entity consider multiple or cumulative transactions?	
C157	How many threshold-triggered CDD examinations were performed in the reporting period?	
C158	Does your entity monitor client cash transaction activity for ensuring the 30,000 EUR cash limit is not exceeded within 6 months?	
C159	How many times has your entity refused a client transaction due to exceeding the 30,000 EUR cash limit within 6 months?	
C160	Have you rejected transactions due to insufficient originator or beneficiary information?	
C161	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	
C162	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	

C#	Question Text	Instructions
C163	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
C164	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
	1.12 Record Keeping	
C165	Does your entity keep transaction records for at least 5 years?	
C166	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C167	Does your entity keep these records and documents in a safe and secure place?	
C168	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.
C169	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
	1.13 Targeted Financial Sanctions (TFS)	
C170	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).
C171	Are the board and senior management of your entity engaged in overseeing risks and compliance matters	The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to

C#	Question Text	Instructions
	related to TFS for Terrorist Financing and Proliferation Financing?	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.
C172	Does your entity have a system to check the Customer Database?	
C173	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C174	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C175	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for account holders (titulaires)?	
C176	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
C177	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C178	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C179	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
C180	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C181	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	

C#	Question Text	Instructions
C182	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C183	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C184	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C185	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C186	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
C187	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C188	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C189	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.	
C190	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C191	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
1.14 Politically Exposed Persons (PEPs)		
C192	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C193	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C194	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.
C195	Did you enter into any relationships with PEPs during the reporting period?	

C#	Question Text	Instructions
C196	Does PEP screening occur as part of the CDD process for new customers?	
C197	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C198	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C199	Does screening for PEPs occur on an ongoing basis?	
C200	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C201	Are PEPs subject to increased monitoring?	
C202	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C203	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?	
C204	Among your clientele, are there any individuals who became PEPS during the course of the business relationship during the reporting period?	
1.15 Suspicious Transaction Reporting		
C205	Is your entity registered with goAML?	
C206	Please describe why.	
C207	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C208	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)
C209	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C210	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C211	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).
C212	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).
C213	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	

C#	Question Text	Instructions
C214	Please provide the total number of STRs/SARs related to Virtual Assets or Virtual Asset Service Providers provided to the FIU within the reporting period.	
C215	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.
C216	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C217	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C218	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.	
C219	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C220	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.	
C221	Has your entity refused to take goods based on suspicion within the reporting period?	
C222	What are the main reasons to your entity refused to take goods within the reporting period?	
C223	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
C224	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C225	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
C226	Do you have feedback related to any questions in this section?	
C227	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.