Instructions: 2025 Car Dealers 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.

Contents

Glossary **4**
Instructions, Inherent Risk **8**
1 Customer Risk 8
1.1 Active in Reporting Period 8
1.2 Clients Summary 8
1.3 Beneficial Owners 9
1.4 Distinguishing Client Types 11
1.5 Clients - Natural Persons 11
1.6 Clients - Legal Persons 11
1.7 Clients - Trusts 12
1.8 Clients - Associations 12
1.9 Clients - Other Legal Arrangements 13
1.10 HNWI's and UHNWI's 13
1.11 Politically Exposed Persons (PEPs) 13
1.12 Comments & Feedback 14
2 Products & Services Risk 14
2.1 Direct Payments with Clients – Cheques 14
2.2 Direct Payments with Clients - Electronic Transfers 15
2.3 Direct Payments with Clients – Cash 16
2.4 Direct Payments with Clients - Other Payments Forms 17
2.5 Direct Payments with Clients – Summary 17
2.6 Virtual Currencies 18
2.7 Products & Services 18
2.8 Lending 19
2.8 Comments & Feedback 19
3 Distribution Risk 19
3.1 Identification 19
3.2 Onboarding 19
3.3 Structure 21
3.4 Entity Finances 22
3.5 Rejected Relationships 23
3.6 Terminated Relationships 23
3.7 Comments & Feedback 23
Instructions, Controls **24**
Controls 24
1.1 Structure 24

1.2 Policies & Procedures 25
1.3 Governance 26
1.4 Compliance & Violations 27
1.5 Training 27
1.6 CDD 29
1.7 EDD 32
1.8 Risk Assessments 33
1.9 Audit / Controls 33
1.10 Cash Transactions 34
1.11 Monitoring 34
1.12 Record Keeping 35
1.13 Targeted Financial Sanctions (TFS) 35
1.14 Politically Exposed Persons (PEPs) 37
1.15 Suspicious Transaction Reporting 38
1.16 Comments & Feedback 40
Instructions, Signatories 41
Signatories 41

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)	**Activities subject to the law:** 15° ter) traders and persons who organise the sale of land motor vehicles only when the value of the transaction or a series of related transactions is equal to or greater than an amount set by Sovereign Order, determined according to the method of payment. The amount provided for in point 15° ter) of the first paragraph of Article 1 of Act 1.362 of 3 August 2009, as amended, referred to above, is set at the sum of 10,000 euros when the transaction or series of linked transactions is paid for in cash and at the sum of 100,000 euros when the transaction or series of linked transactions is paid for by any means of payment other than cash.
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) with 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.**

Q#	Question Text	Instructions
		· **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.
Q6	Please provide the total value of payments (both incoming and outgoing) with clients within the reporting period.	Please indicate the total amount of all financial flows. All transactions that result in a flow (in/out) must be recorded. Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 → **made in 2025** • Payment no. 2: €30,000 → **made in 2025** • Payment no. 3: €30,000 → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments: **€70,000** • **2026 Reporting period**: Total value of payments: **€30,000** This value will be validated against other answers provided to subsequent questions regarding the number of transactions carried out by individuals, legal entities, trusts, and other legal structures. The answers are mutually exclusive.
1.3 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.	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,

Q#	Question Text	Instructions
		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).
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.

Q#	Question Text	Instructions
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 Distinguishing Client Types		
Regardless of whether you have such clients, does your entity both identify and record the type of clients when they are:		
Q19	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.
Q20	Associations?	
Q21	Other Legal Arrangements not mentioned above?	
Q22	HNWI's?	
1.5 Clients - Natural Persons		
Q23	Does your entity have clients that are Natural Persons?	
Q24	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.
Q25	*# Natural Person Clients*	**Auto-calculated**
Q26	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
Q27	*# Natural Person Clients*	**Auto-calculated**
Q28	*Difference between Total by Nationality and Total by Residency.*	**Auto-calculated**
Q29	Please provide the total number of transactions (both incoming and outgoing) with clients that are Natural Persons.	
Q30	Please provide the total value of payments (both incoming and outgoing) with clients that are Natural Persons, in EUR.	
1.6 Clients - Legal Persons		
Q31	Does your entity have clients that are legal persons?	

Q#	Question Text	Instructions
Q32	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q33	Please provide the total number of transactions (both incoming and outgoing) with clients that are Legal Persons.	
Q34	Please provide the total value of payments (both incoming and outgoing) with clients that are Legal Persons.	
Q35	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
Q36	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.7 Clients - Trusts		
Q37	Does your entity have clients that are Trusts?	
Q38	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q39	Does your entity have information related to the number and value of their transactions?	
Q40	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
Q41	Please provide the total value of payments (both incoming and outgoing) with clients that are Trusts.	
Q42	Please provide the total number of Monegasque unique clients that are Trusts.	
Q43	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q44	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		
Q45	Does your entity have clients that are Associations?	

Q#	Question Text	Instructions
Q46	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q47	Does your entity have information related to the number and value of their transactions?	
Q48	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
Q49	Please provide the total value of payments (both incoming and outgoing) with clients that are Associations.	
1.9 Clients - Other Legal Arrangements		
Q50	Does your entity have clients that are Other Legal Arrangements?	
Q51	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q52	Does your entity have information related to the number and value of their transactions?	
Q53	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
Q54	Please provide the total value of payments with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q55	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		
Q56	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.
Q57	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.	
Q58	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.
Q59	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.11 Politically Exposed Persons (PEPs)		
Q60	Does your entity have any Politically Exposed Persons (PEPs) as clients?	

Q#	Question Text	Instructions
Q61	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q62	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q63	How many foreign PEPs have residency in Monaco, broken down by primary nationality?	
Q64	Please provide the total number of transactions (both incoming and outgoing) with clients that are PEPs.	
Q65	Please provide the total value of payments (both incoming and outgoing) with clients that are PEPs.	
Q66	Please provide the total number of unique Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement. The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.
Q67	Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
Q68	Please provide the total value of payments (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
1.12 Comments & Feedback		
Q69	Do you have feedback related to any questions in this section?	
Q70	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.		
Q71	Does your entity accept or make Cheque transactions with clients?	
Q72	Did your entity accept or make Cheque transactions with clients within the reporting period?	
Q73	Please provide the total number of transactions by Cheque (both incoming and outgoing) with clients.	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**

Q#	Question Text	Instructions
		• 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**
Q74	Please provide the total value of payments by Cheque with clients (both incoming and outgoing) within the reporting period.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by 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		
Q75	Does your entity accept or make transactions by Electronic Transfers 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.
Q76	Did your entity accept or make transactions by Electronic Transfer with clients within the reporting period?	
Q77	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**

Q#	Question Text	Instructions
Q78	Please provide the total value of payments by Electronic Transfer with clients (both incoming and outgoing) within the reporting period.	Example: A counterparty pays you a total amount of **€100,000**. The customer pays in **three separate instalments** over two years: • Payment no. 1: €40,000 by electronic transfer → **made in 2025** • Payment no. 2: €40,000 by electronic transfer → **made in 2025** • Payment no. 3: €30,000 by electronic transfer → **made in 2026** **Only payments made during the reporting period are to be recorded.** • **2025 reporting period**: Total value of payments by electronic transfer: **€80,000**
Q79	Does your entity accept Credit Card transactions with clients?	
Q80	Did your entity accept or make transactions by Credit Card with clients within the reporting period?	
Q81	Among the electronic transfers reported, please provide the total number of Credit Card transactions with clients, within the reporting period.	
Q82	*Total number of transactions by Electronic Transfer*	**Auto-calculated**
Q83	Please provide the total value of Credit Card payments with clients, within the reporting period.	
Q84	*Total value of payments by Electronic Transfer*	**Auto-calculated**
2.3 Direct Payments with Clients – Cash		
Q85	Does your entity accept or make Cash transactions with clients?	
Q86	Did your entity accept or make Cash transactions with clients within the reporting period?	
Q87	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**

Q#	Question Text	Instructions
Q88	Please provide the total value of payments in cash 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**
Q89	Does your entity accept or make Foreign Currency Cash transactions with clients?	
Q90	Please provide the total value of payments in Cash with clients, in currency other than EUR, during the reporting period, both incoming and outgoing.	
Q91	Please provide the total number of single cash transactions equal to or greater than 10,000 euros (both incoming and outgoing) with clients within the reporting period.	
Q92	Can your entity distinguish cash transactions above 100,000 EUR in your record keeping?	
Q93	Number of physical cash transactions with Natural Persons in excess of 100,000 EUR within the reporting period, both incoming and outgoing.	
Q94	Number of physical cash transactions with Monegasque Legal Persons in excess of 100,000 EUR within the reporting period, both incoming and outgoing.	
Q95	Number of physical cash transactions with Foreign Legal Persons in excess of 100,000 EUR within the reporting period, both incoming and outgoing.	
2.4 Direct Payments with Clients - Other Payments Forms		
Q96	Does your entity use any other payment types with clients?	
Q97	Please provide the total number of other transactions with clients, within the reporting period.	
Q98	Please provide the total value of Other Payments Types with clients, within the reporting period.	
Q99	Which other payment types?	
2.5 Direct Payments with Clients – Summary		
Q100	*Sum of # transactions with clients*	**Auto-calculated**
Q101	*# Transactions with clients (Repeat of Q5)*	**Repeat field, used for data validation. Auto-calculated**

Q#	Question Text	Instructions
Q102	*Sum of value payments with clients*	**Auto-calculated**
Q103	*Value payments with clients (Repeat of Q6)*	**Repeat field, used for data validation. Auto-calculated**
	2.6 Virtual Currencies	
Q104	Do you have clients that use cryptocurrencies?	
Q105	Please provide the total number of Virtual Assets transactions (both incoming and outgoing) with clients.	
Q106	Please provide the value of funds transferred using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
Q107	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.
Q108	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q109	Please name the Virtual Asset Platforms or Intermediaries, with which your entity has business relationships.	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 Products & Services	
Q110	What is the proportion of transaction value that is with Occasional Customers?	
Q111	Please provide the total number of single transactions with clients exceeding 100,000 EUR (both incoming and outgoing) within the reporting period.	
Q112	How many vehicles were sold within the reporting period?	
Q113	What was the value of vehicles sold within the reporting period?	
Q114	How many vehicles were sold within the reporting period with a value over 100,000 EUR?	
Q115	How many vehicle sales over 10,000 EUR paid in cash within the reporting period?	
Q116	Does your entity offer car rental services?	
Q117	How many vehicle rentals were made during the reporting period?	
Q118	What was the value of rentals within the reporting period?	
Q119	Does your entity sell used cars?	
Q120	How many used cars were purchased within the reporting period?	
Q121	From how many clients have you purchased used cars within the reporting period?	
Q122	What was the value of used vehicles bought within the reporting period?	
Q123	How many vehicles were purchased within the reporting period with a value over 100,000 EUR?	

Q#	Question Text	Instructions
Q124	Does your entity purchase vehicles in cash?	
Q125	How many vehicles of a value over 10,000 EUR were purchased with cash within the reporting period?	
Q126	Does your entity offer combined rent-to-own, leasing-to-ownership type payment schemes?	
2.8 Lending		
Q127	Does your entity propose and facilitate lending or credit to clients?	
Q128	With which companies does the entity work with for providing lending and credit facilities?	
Q129	Please provide the total number of loans provided to clients.	
Q130	Please provide the total value of loans provided to clients.	
Q131	Does your entity have any Other Loan Products, not mentioned above, that it offers to clients?	
Q132	Please specify the type of Other Loan Products at your entity not mentioned above it offers to clients.	
2.8 Comments & Feedback		
Q133	Do you have feedback related to any questions in this section?	
Q134	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q135	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.
Q136	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.	
Q137	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q138	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.
Q139	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		
Q140	Did your entity onboard clients within the reporting period?	

Q#	Question Text	Instructions
Q141	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.
Q142	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.
Q143	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.
Q144	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.
Q145	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.
Q146	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.
Q147	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.
Q148	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.
Q149	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.
Q150	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.

Q#	Question Text	Instructions
Q151	Does the entity record information on the nationality of clients approached by the business introducer?	
Q152	Can the entity provide introducers residency information?	
Q153	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.
Q154	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.
Q155	*Difference between number of clients onboarded by nationality 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.**
Q156	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.
Q157	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.
Q158	*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		
Q159	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
Q160	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.

Q#	Question Text	Instructions
Q161	Does your entity have any Branches, Subsidiaries, or Agencies?	
Q162	Please provide the total number of Branches, Subsidiaries, and Agencies of the licensed domestic entity, broken down by country.	
Q163	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".
Q164	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q165	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q166	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q167	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)	
Q168	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.	
Q169	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?
Q170	Please indicate the development or modification.	
Q171	Is your entity part of an international business network or group?	
Q172	If so, please specify.	
Q173	Is your entity a member of a professional association or society?	
Q174	If so, please specify.	
Q175	Do you work with agents located abroad?	
3.4 Entity Finances		
Q176	Turnover for the reporting period.	
Q177	Turnover for the reporting period realized in the Principality of Monaco.	
Q178	Turnover for the reporting period realized outside the Principality of Monaco.	

Q#	Question Text	Instructions
Q179	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		
Q180	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q181	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		
Q182	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q183	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		
Q184	Do you have feedback related to any questions in this section?	
Q185	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 Q160.** 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 persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C5	Approximately how many hours were spent on AML/CFT/CPF per month?	
C6	Is your entity part of a Group?	
C7	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance Examples of an entity that does not have a board or senior management:

C#	Question Text	Instructions
		• A sole proprietor • A partnership • A small business with a single layer of management
C8	Do you use external service providers for AML/CFT/CPF?	
C9	What is the purpose of your contract with these external service providers?	
C10	Please provide the total number of full-time equivalent of external AML/CFT/CPF service providers within your entity, at the end of the reporting period.	
C11	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C12	Did your entity prepare a documented set of AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has written policies and procedures in place that outline how the reporting entity implements AML/CFT/CPF legal requirements.
C13	Were these policies and procedures approved by the board and/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
C14	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C15	Did your entity ensure awareness of these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C16	Did your entity update their written AML/CFT/CPF Policies and Procedures in the last year?	
C17	Please provide the date of the last update to your entity's written AML/CFT/CPF Policies and Procedures.	
C18	Does your entity have a systematic practice of tracking and managing changes to the AML/CFT/CPF Policies and Procedures?	The reporting entity should disclose whether it has a systematic practice of tracking and managing changes to AML/CFT/CPF Policies and Procedures, such as version control, or a log/list which allows someone to see the frequency of updates and review processes.
C19	Does your entity have a group-wide AML/CFT/CPF programme?	
C20	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF programme complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
C21	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors?

C#	Question Text	Instructions
		Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C22	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	
C23	Under art. 33, did you establish and communicate internal control procedures to the AMSF?	
C24	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C25	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C26	Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT/CPF matters could include: (1) senior management includes AML/CFT/CPF matters into the daily/ weekly/monthly/quarterly/yearly agenda; (2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks; (3) senior management requests ad-hoc reporting on AML/CFT/CPF matters whenever issues arise; orders internal or external audit to test AML/CFT/CPF controls; (4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT/CPF), buying AML/CFT/CPF monitoring software or sanction screening software, etc.; (5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT/CPF legislation are introduced; (6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.
C27	Does the board and/or senior management of your entity regularly receive AML/CFT/CPF reports?	The reporting entity should disclose whether the board and/or senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT/CPF compliance.

C#	Question Text	Instructions
		Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C28	Does the board and/or senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?	The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control, take actions to rectify shortcomings in AML/CFT/CPF compliance areas and mitigate ML/TF risks. The necessity of actions can be determined based on ML/TF business risk assessment results, periodic AML/CFT/CPF reporting, supervisory onsite examination reports, etc. Examples of such actions might include: (a) approving budgetary resources to hire more employees for AML/CFT/CPF Compliance, investing in employees' knowledge and expertise through training, seminars, certifications (b) buying necessary IT (technical resources), such as monitoring systems, automated screening solutions, (c) prioritizing AML/CFT/CPF area for internal audit, etc.
C29	Does the senior management of your entity review (give approval) for taking on high-risk clients?	In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
C30	Has your entity had any AML/CFT/CPF related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years.
C31	Please provide the total number of AML/CFT/CPF related violations in the past 5 Years.	Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question.
C32	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C33	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C34	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C35	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C36	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	

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

C#	Question Text	Instructions
C57	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C60	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C61	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C62	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C63	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C64	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C65	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C66	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
1.6 CDD		
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 • Level of Risk	
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?	
C74	Please specify other data of Individual recorded.	
C75	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	
C76	Please specify which items are not collected.	
C77	Does the entity's database contain all of the following, when applicable: • Donors • Founders • Introducers • More Complex Ownership Structures • Person who directly or indirectly exercises control of a Foundation • Protector • Settlor/Constituent • Shareholders • Trustee	
C78	Please specify which items are not collected.	
C79	Does your entity record other client information or register client activity information in their database?	The reporting entity should disclose if additional information is recorded / registered into their database. i.e. In addition to client information such as First Name, Last Name, Date of Birth, Place of Birth, Nationality, Country of Residence, Tax Residence, Activity, Source of Wealth, Source of Funds, and client activity information such as Account Holder, Representative of Company or Client, Beneficial Owner, Administrators/Directors, Shareholders, Legal Representatives, Settlor/Constituent, Trustee, Beneficiary of a Trust or other Legal Arrangement, Founders, Donors, Persons who directly or indirectly exercise control of a Foundation, Protector, More Complex Ownership Structures, Introducers?
C80	Please specify what other information is included in your database.	
C81	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
C82	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
C83	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	

C#	Question Text	Instructions
C84	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)?	
C85	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data?	
C86	Please specify other data of Legal Persons / Legal Arrangements recorded.	
C87	Does your entity research clients on the Internet?	
C88	Does your entity research client using the Journal de Monaco?	
C89	Does your entity research client using sites specializing in services of risk detection?	
C90	Does your entity research client using business websites?	
C91	Does your entity research client's organization, board members, etc.?	
C92	Does your entity research clients in the press?	
C93	What other information is used to research the client?	
C94	Are the results of the research systematically recorded?	
C95	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C96	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C97	What is the percentage/ shareholding threshold that triggers the systematic recording of information on beneficial owners within your entity?	
C98	Is past 5 years of client relationship data accessible by AMSF upon request?	
C99	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C100	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.
C101	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.**
C102	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C103	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C104	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	

C#	Question Text	Instructions
C105	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C106	Did you select "Trigger Event" in the previous question?	
C107	Please name all trigger events for ongoing due diligence done on clients classified as High-Risk for ML/FT.	
C108	Does your entity examine the source of wealth before customer take-on?	
C109	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C110	Please specify other measures taken for high-risk clients, before customer take-on.	
C111	Does your entity conduct Virtual Assets transactions with or on behalf of clients?	
C112	How does the company verify the Beneficial Owners of Virtual Assets?	
C113	Does your entity ever rely on third parties to collect CDD information about clients?	
C114	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?	
C115	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C116	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).	
C117	Does the evolution of the clients services requested contribute to the identification of red flags?	
	1.7 EDD	
C118	Did you apply enhanced due diligence measures to clients during the reporting period?	
C119	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C120	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C121	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.
C122	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C123	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.

C#	Question Text	Instructions
	1.8 Risk Assessments	
C124	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C125	How many AML/CFT/CPF risk levels does your entity have for clients?	
C126	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C127	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C128	Does your entity have any clients without risk level determined at the end of the reporting period?	
C129	Please provide the total number of unique clients that are without a risk level determined yet.	
C130	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 • Volume of Operations • Nature of Operations • Trigger Events	
C131	Please specify which items are not considered.	
C132	Does your entity's High-Risk assignment consideration include any additional measures not mentioned above?	
C133	Please specify what additional measure not mentioned above are included your entity's High-Risk assignment considerations.	
C134	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C135	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C136	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C137	What client activities does your entity associate with High-Risk clients?	
C138	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
C139	Does your entity consider ML and TF risks separately?	(entity's own assessment)
	1.9 Audit / Controls	
C140	When did your entity last have a SICCFIN/AMSF audit?	
C141	Did your entity have any Other Audits not mentioned above?	
C142	Specify the types of Other Audits, and provide the year of the last audit of each kind.	

C#	Question Text	Instructions
	1.10 Cash Transactions	
C143	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C144	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions?	
C145	Please describe the specific controls and procedures for cash transactions your entity applies.	
	1.11 Monitoring	
C146	Does your entity have in place a system for monitoring transactions for potential suspicion and reporting suspicious transactions?	
C147	Please provide the total number of transactions (both incoming and outgoing) with clients within the reporting period.	**Repeat the response from Q5.**
C148	Do you have a system that generates alerts related to Money Laundering?	
C149	Please provide the total number of Alerts in Reporting Period by the system related to Money Laundering.	
C150	Please provide the total number of Alerts resulting in Specific Review Reports related to Money Laundering.	
C151	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Money Laundering.	
C152	Do you have a system that generates alerts related to Terrorism Financing?	
C153	Please provide the total number of Alerts in Reporting Period by the system related to Terrorism Financing.	
C154	Please provide the total number of Alerts resulting in Specific Review Reports related to Terrorism Financing.	
C155	Please provide the total number of Alerts leading to filing of a Suspicious Transaction Report related to Terrorism Financing.	
C156	Has your entity formalized and used the identification thresholds required by your sector?	
C157	How many threshold-triggered CDD examinations were performed in the reporting period?	
C158	Does your entity consider multiple or cumulative transactions?	
C159	Does your entity monitor client cash transaction activity for ensuring the 30,000 EUR cash limit is not exceeded within 6 months?	
C160	How many times has your entity refused a client transaction due to exceeding the 30,000 EUR cash limit within 6 months?	
C161	Have you rejected transactions due to insufficient originator or beneficiary information?	
C162	Please provide the total number of incoming transactions rejected due to insufficient originator or beneficiary information.	

C#	Question Text	Instructions
C163	Please provide the total value of incoming funds rejected due to insufficient originator or beneficiary information in EUR.	
C164	Please provide the total number of outgoing transactions rejected due to insufficient originator or beneficiary information.	
C165	Please provide the total value of outgoing funds rejected due to insufficient originator or beneficiary information in EUR.	
1.12 Record Keeping		
C166	Does your entity keep transaction records for at least 5 years?	
C167	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C168	Does your entity keep these records and documents in a safe and secure place?	
C169	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.
C170	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.13 Targeted Financial Sanctions (TFS)		
C171	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
C172	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for Terrorist Financing and Proliferation Financing?	
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	Are the board and/or 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.
C175	Does your entity have a system to check the Client Database?	
C176	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C177	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients?	
C178	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
C179	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C180	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C181	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	

C#	Question Text	Instructions
C182	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C183	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
C184	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C185	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C186	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C187	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C188	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary?	
C189	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C190	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C191	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.	
C192	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C193	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
C194	Has your entity taken any other actions related to Terrorism Financing or Financing of Proliferation of Weapons of Mass Destruction?	
C195	Has your entity taken any other actions related to Terrorism Financing?	
C196	What other actions related to financing of Proliferation of Weapons of Mass Destruction has your entity taken?	
1.14 Politically Exposed Persons (PEPs)		
C197	Does your entity take measures to determine whether Clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	

C#	Question Text	Instructions
C198	What measures does your entity apply to determine whether Clients and Beneficial Owners are PEPs?	
C199	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.
C200	Did you enter into any relationships with PEPs during the reporting period?	
C201	Does PEP screening occur as part of the CDD process for new customers?	
C202	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C203	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C204	Does screening for PEPs occur on an ongoing basis?	
C205	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C206	Are PEPs subject to increased monitoring?	
C207	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C208	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?	
C209	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		
C210	Is your entity registered with goAML?	
C211	Please describe why.	In case the above question is answered “No”.
C212	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C213	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)
C214	Did your entity submit any STRs/SARs to the FIU within the reporting period?	

C#	Question Text	Instructions
C215	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C216	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).
C217	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).
C218	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C219	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.	
C220	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.
C221	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C222	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C223	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.	
C224	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C225	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.	
C226	Please provide the total number of STRs/SARs related to Rejected Relationships provided to the FIU within the reporting period.	
C227	Please provide the total number of STRs/SARs related to Rejected Transactions provided to the FIU within the reporting period.	
C228	Please provide the total number of attempted transactions reported to the FIU, within the reporting period.	
C229	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.
C230	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to	

C#	Question Text	Instructions
	improve Suspicious Transaction Reporting within the reporting period?	
1.16 Comments & Feedback		
C231	Do you have feedback related to any questions in this section?	
C232	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.