Instructions: 2025 Notaries 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? (See link here)	Have you participated, by or on behalf of a client, in financial or real estate transactions? Have you assisted a client in preparing or executing transactions involving: i) the purchase and sale of real estate or commercial enterprises; ii) the management of funds, securities or other assets belonging to the client; iii) the opening or management of bank accounts, savings accounts or portfolios; iv) the organization of contributions necessary for the formation, management or direction of companies; v) the formation, management or direction of trusts, companies, foundations or similar structures.
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 with clients within the reporting period, both incoming and outgoing.	Example: A counterparty pays you in **three separate instalments** over two years: • Payment no. 1 → **made in 2025**

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

Q#	Question Text	Instructions
Q10	For what transaction conditions does your entity record Beneficial Owners' information?	
Q11	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).
Q12	Can your entity distinguish nationality of clients' Beneficial Owners?	Indicate whether or not your entity is able to make the distinction.
Q13	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.
Q14	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.
Q15	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	

Q#	Question Text	Instructions
		If the nationality is unknown, please select 'Unknown' from the drop-down list.
Q16	Can your entity distinguish BO's that have 25% or greater ownership of a legal person, trust or other legal arrangement?	
Q17	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
Q18	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q19	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.	
Q20	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:		
Q21	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.
Q22	Associations?	
Q23	Other Legal Arrangements not mentioned above?	
Q24	HNWI's?	
Q25	Non-Profit Organization?	
Q26	Cash Intensive Business (such as bars, restaurants)?	
1.5 Clients - Natural Persons		
Q27	Does your entity have clients that are Natural Persons?	
Q28	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.
Q29	*# Natural Person Customers*	**Auto-calculated**
Q30	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by residency of the individual.	
Q31	*# Natural Person Customers*	**Auto-calculated**

Q#	Question Text	Instructions
Q32	*Difference between Total by Nationality and Total by Residency.*	**Auto-calculated**
Q33	Please provide the total number of transactions with clients that are Natural Persons, both incoming and outgoing.	
Q34	Please provide the total number of transactions with clients that are Natural Persons, specifically where such transactions were part of a Monegasque domiciliation/residency application, both incoming and outgoing.	
Q35	Please provide the total number of transactions with clients that are Natural Persons that were represented by another person through a power of attorney, both incoming and outgoing.	
Q36	Please provide the total number of transactions with clients that are Natural Persons, specifically where such transactions involved real estate assets, both incoming and outgoing.	
Q37	Please provide the total value of payments with clients that are natural persons, both incoming and outgoing.	
1.6 Clients - Legal Persons		
Q38	Does your entity have clients that are legal persons?	
Q39	Please provide the total number of unique clients that are legal persons, by client's country of headquarters or incorporation.	
Q40	Please provide the total number of transactions with clients that are legal persons, both incoming and outgoing.	
Q41	Please provide the total number of transactions with clients that are legal persons, specifically where such transactions were part of a Monegasque domiciliation process/application, both incoming and outgoing.	
Q42	Please provide the total number of transactions with clients that are Legal Persons, specifically where such transactions involved real estate assets, both incoming and outgoing.	
Q43	Please provide the total value of payments with clients that are legal persons, both incoming and outgoing.	
Q44	Does your entity distinguish whether clients are Monegasque Legal Persons and the type of Legal Person?	• Limited Liability Companies • Limited Partnership SCS • Commercial Partnership SNC • Joint Stock Company SAM • Limited Partnership with Shares SCA • Property Investment Partnership SCI • Special Civil-law Partnership SCP • Monegasque Foundation • Monegasque Associations • Economic Interest Group GIE • Private Domain of the Monegasque State • Trusts

Q#	Question Text	Instructions
		• Other Civil Companies • Other Commercial Companies • Other Legal Arrangements • Sole Person
Q45	Please provide the number of Monegasque Legal Persons as clients, by type.	
Q46	Does your entity have legal person clients that have more complex ownership structures?	
Q47	Please indicate the total number of legal entity clients, whose shareholding is held by legal entities or legal arrangements incorporated or created outside Monaco, broken down by country.	
Q48	Please indicate the total number of legal entity clients, whose shareholding is held in fiduciary capacity.	
Q49	Please indicate the total number of legal entity clients, whose shareholding is held through bearer shares.	
1.7 Clients - Trusts		
Q50	Does your entity have clients that are Trusts?	
Q51	Please provide the total number of unique clients that are Trusts, broken down by country of trust formation.	
Q52	Please provide the total number of transactions with clients that are Trusts, both incoming and outgoing.	
Q53	Please provide the total number of transactions with clients that are Trusts, specifically where such transactions were part of a Monegasque domiciliation process/application, both incoming and outgoing.	
Q54	Please provide the total number of transactions with clients that are Trusts, specifically where such transactions involved real estate assets, both incoming and outgoing	
Q55	Please provide the total value of payments with clients that are Trusts, both incoming and outgoing.	
Q56	Please provide the total number of Monegasque unique clients that are Trusts.	
Q57	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q58	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		
Q59	Does your entity have clients that are Associations?	
Q60	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q61	Does your entity have information related to the number and value of their transactions?	

Q#	Question Text	Instructions
Q62	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	
Q63	Please provide the total value of payments with clients that are Associations, both incoming and outgoing.	
1.9 Clients - Other Legal Arrangements		
Q64	Does your entity have clients that are Other Legal Arrangements?	
Q65	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q66	Does your entity have information related to the number and value of their transactions?	
Q67	Please provide the total number of transactions with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q68	Please provide the total number of transactions with clients that are Other Legal Arrangements, specifically where such transactions were part of a Monegasque domiciliation process/application, both incoming and outgoing.	
Q69	Please provide the total number of transactions with clients that are Other Legal Arrangements, specifically where such transactions involved real estate assets, both incoming and outgoing.	
Q70	Please provide the total value of payments with clients that are Other Legal Arrangements, both incoming and outgoing.	
1.10 HNWI's and UHNWI's		
Q71	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.
Q72	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).	
Q73	Please provide the total number of transactions with clients that are HNWIs or individuals belonging to a HNW Group, both incoming and outgoing.	
Q74	Please provide the total value of payments with clients that are HNWIs or individuals belonging to a HNW Group, both incoming and outgoing.	
Q75	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.	
Q76	Please provide the total number of unique beneficial owners of Legal Arrangements clients (that are not	

Q#	Question Text	Instructions
	Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q77	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.
Q78	Please provide the total number of unique clients that are UHNWIs or individuals belonging to a UHNW Group, broken down by the primary nationality of the client (including domestic clients).	
Q79	Please provide the total number of transactions with clients that are UHNWIs or individuals belonging to a UHNW Group, both incoming and outgoing.	
Q80	Please provide the total value of payments with clients that are UHNWIs or individuals belonging to a UHNW Group, both incoming and outgoing.	
Q81	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.	
Q82	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 Clients - NPOs		
Q83	Does your entity have clients that are Non-Profit Organizations?	
Q84	Please provide the total number of unique clients that are NPOs.	
Q85	Please provide the total number of Monegasque unique clients that are NPOs.	
1.12 Clients - Cash Intensive Businesses		
Q86	How does your entity define a cash intensive business?	
Q87	Does your entity have clients that are cash intensive businesses?	
Q88	Please provide the total number of unique clients that are engaged in cash intensive business.	
1.13 Politically Exposed Persons (PEPs)		
Q89	Does your entity have any Politically Exposed Persons (PEP) as clients?	
Q90	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q91	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q92	Please provide the total number of transactions with clients that are PEPs, both incoming and outgoing.	

Q#	Question Text	Instructions
Q93	Please provide the total value of payments with clients that are PEPs, both incoming and outgoing.	
Q94	Please provide the total number of unique Beneficial Owners of Legal Person/Trust/Other Legal Arrangement clients that are PEPs, broken down by the primary nationality of the PEP.	For the purpose of this question, Beneficial Owner should mean any Natural Person who owns or exercises effective ultimate control, directly or indirectly, over a client or the Natural Person who exercises effective ultimate control over a Legal Person or Legal Arrangement. The term "unique Beneficial Owners" denotes that while a Natural Person might be the Beneficial Owners of several Legal Persons/Arrangements it should only be counted as one.
Q95	Please provide the total number of transactions with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs, both incoming and outgoing.	
1.14 Comments & Feedback		
Q96	Do you have feedback related to any questions in this section?	
Q97	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.		
Q98	Does your entity accept or make cheque transactions with clients?	
Q99	Did your entity accept or make transactions by Cheque with clients within the reporting period?	
Q100	Please provide the total number of cheque transactions with clients, both incoming and outgoing.	Example: A counterparty pays you in **three separate instalments** spread over two years: • Payment no. 1: €40,000 by cheque → **made in 2025** • Payment no. 2: €40,000 by cheque → **made in 2025** • Payment no. 3: €30,000 by cheque → **made in 2026** **Only transactions carried out during the reporting period are to be recorded.** **2025 reporting period**: Total number of transactions by cheque: **2**
Q101	Please provide the total number of transactions related to real estate settled with cheques that you / your entity provide notary services.	
Q102	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:

Q#	Question Text	Instructions
		• 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		
Q103	Does your entity accept or make transactions by Electronic Transfer with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, direct debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q104	Did your entity accept or make transactions by Electronic Transfer with clients within the reporting period?	
Q105	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**
Q106	Please provide the total number of transactions related to real estate settled with electronic payment that you / your entity provide notary services.	
Q107	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**:

Q#	Question Text	Instructions
		Total value of payments by electronic transfer: **€80,000**
Q108	Does your entity accept or make transactions by Credit Card with clients?	
Q109	Did your entity accept or make transactions by Credit Card with clients within the reporting period?	
Q110	Among the electronic transfers reported, please indicate the total number of Credit Card transactions with clients, both incoming and outgoing.	
Q111	*Total number of Electronic Transfers*	**Auto-calculated**
Q112	Please provide the total value of Credit Card payments with clients, within the reporting period.	
Q113	*Total value of payments by Electronic Transfer*	**Auto-calculated**
2.3 Direct Payments with Clients – Cash		
Q114	Does your entity accept or make cash transactions with clients?	
Q115	Did your entity accept or make Cash payments with clients within the reporting period?	
Q116	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**
Q117	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**

Q#	Question Text	Instructions
		Only payments made during the reporting period are to be recorded. • **2025 reporting period**: Total value of cash payments: **€10,000**
Q118	Please provide the total value of payments with clients, in cash in currencies other than the Euro, during the reporting period, both incoming and outgoing.	
Q119	Please provide the total number of transactions related to real estate settled with cash payment (even partially) that you / your entity provide notary services.	
Q120	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.	
Q121	Please provide the total number of single cash transactions exceeding 30,000 euros within the reporting period, representing deposit payments in relation to purchase and sale contracts.	
Q122	Please provide the total number of transactions within the reporting period, related to purchase and sale contracts (i.e. excluding promise of sale agreements), where the consideration was paid more than 50,000 Euro in cash.	
Q123	Please provide the total number of transactions within the reporting period, related to purchase and sale contracts (i.e. excluding promise of sale agreements), where the consideration was paid entirely in cash.	
Q124	Can your entity distinguish cash transactions above EUR 100,000 in your record keeping?	
Q125	Number of transactions in cash by Natural Persons in excess of EUR 100,000 during the reporting period, both incoming and outgoing.	
Q126	Number of transactions in cash by Monegasque Legal Persons in excess of EUR 100,000 during the reporting period, both incoming and outgoing.	
Q127	Number of transactions in cash by Foreign Legal Persons in excess of EUR 100,000 during the reporting period, both incoming and outgoing.	
2.4 Direct Payments with Clients - Other Payments Forms		
Q128	Does your entity use any other payment types with clients?	
Q129	Please provide the total number of transactions by other payment types with clients, within the reporting period.	

Q#	Question Text	Instructions
Q130	Please provide the total value of Other Payments Types with clients, within the reporting period.	
Q131	Which other payment types?	
2.5 Direct Payments with Clients – Summary		
Q132	*Sum of # Transactions with clients*	**Auto-calculated**
Q133	*# Transactions with clients (Repeat of Q5)*	**Repeat field, used for data validation. Auto-calculated**
Q134	*Sum of value payments with clients*	**Auto-calculated**
Q135	*Value payments with clients (Repeat of Q6)*	**Repeat field, used for data validation. Auto-calculated**
2.6 Virtual Currencies		
Q136	Does your entity plan to be active in, or offer products and services in, virtual assets in the next year?	
Q137	Does your entity have business relationships with virtual assets platforms or intermediaries?	
Q138	Please name the virtual asset platforms or intermediaries, that your entity has business relationships with.	
2.7 Products & Services		
Q139	Does your entity provide services related to managing of client money held in banks, savings, or deposit accounts?	
Q140	Does your entity provide services related to managing of client money held in securities or other assets portfolios?	
Q141	Does your entity hold funds on trust, or in another fiduciary capacity for customers through a client account?	
Q142	Does your entity accept or make transactions on behalf of clients?	
Q143	Does your entity engage or advise on mergers and acquisitions of companies?	
Q144	Do you accept payments from unassociated or unknown third parties?	
Q145	Have you been engaged to act on behalf of, or represent, a client during the reporting period, (i.e. power of attorney and / or power of representation)?	
Q146	Are you providing tax advisory services?	
Q147	Do you provide advice for buying or selling of Real Estate?	
Q148	Does your establishment provide services for establishing legal entities?	
Q149	Do you provide advice for the creation or administration or management of any type of trusts and Other Legal Arrangements?	
Q150	Please provide the total number of contracts related to real estate in which you were involved.	
Q151	Please provide the total number of contracts related to real estate with value up to 450,000 Euro in which you were involved.	

Q#	Question Text	Instructions
Q152	Please provide the total number of contracts related to real estate with value between 450,000 Euro and 2m Euro in which you were involved.	
Q153	Please provide the total number of contracts related to real estate with value over 2m Euro in which you were involved.	
Q154	How many purchase and sale contracts have you been involved in where the counterparty was financed through a loan issued through a non-EU / EEA financial / credit institution?	
Q155	How many purchase and sale contracts have you been involved in where the counterparty was financed through loans or other means of finance other than those issued by a regulated financial / credit institution?	
Q156	How many purchase and sale contracts were you involved in where the counterparty was paid through the buyer's own or third party funds (i.e. not financed by a financial/credit institution)?	
Q157	How many purchase and sale contracts were you involved in where the deposit was paid through the buyer's own or third party funds (i.e. not financed by a financial/credit institution)?	
Q158	Please provide the total number of contracts or transactions carried out during the reporting period, which involved properties located outside Monaco and in risky jurisdictions (national list, FATF).	
Q159	Please specify the highest sale value of property sold in which you were involved, during the reporting period.	
Q160	Were there any contracts or deals during the reporting period, subsequent to which it came to your attention that the seller was declared as bankrupt or insolvent?	
Q161	Were there contracts or deals from the reporting period which involved successive transactions relating to the same property which took place within a short period of time?	
Q162	Does your entity provide any other revenue generating products or services?	
Q163	Please provide the total number of customers to whom you provided relevant activity, other than services concerning the buying and selling of real property or business entities.	
2.8 Comments & Feedback		
Q164	Do you have feedback related to any questions in this section?	
Q165	Please provide comments or feedback on this section here.	

Q#	Question Text	Instructions
3 Distribution Risk		
3.1 Identification		
Q166	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.
Q167	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.	
Q168	Does your entity rely on foreign third parties to undertake some/all CDD measures towards clients?	
Q169	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.
Q170	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		
Q171	Did your entity onboard clients within the reporting period?	
Q172	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.
Q173	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.
Q174	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.
Q175	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.

Q#	Question Text	Instructions
Q176	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.
Q177	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.
Q178	Please provide the n umber of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique legal person clients should be indicated here.
Q179	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.
Q180	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.
Q181	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.
Q182	Can the entity provide client nationality information for clients onboarded through introducers?	
Q183	Can the entity provide introducers residency information?	
Q184	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.
Q185	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.
Q186	*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.**
Q187	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.
Q188	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.

Q#	Question Text	Instructions
Q189	*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		
Q190	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
Q191	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.
Q192	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".
Q193	Does your entity have any branches, subsidiaries, or agencies?	
Q194	Please provide the total number of branches, subsidiaries, and agencies of the licensed domestic entity, broken down by country.	
Q195	Is your entity a branch or subsidiary of a Foreign Entity?	
Q196	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q197	In which country is the parent undertaking?	
Q198	Is your entity part of an international business network or group?	
Q199	Please specify which international business network or group.	
Q200	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)	
Q201	Please provide the number of beneficial owners with 25% or greater shareholding, direct or indirect control	

Q#	Question Text	Instructions
	of the company, or is a senior managing official, broken down by primary nationality.	
Q202	Is your entity a member of a professional association?	
Q203	Which association or society?	
Q204	Does your entity work with agents located abroad?	
Q205	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?
Q206	Please indicate the development or modification.	
	3.4 Entity Finances	
Q207	Turnover for the reporting period.	
Q208	Turnover for the reporting period realized in the Principality of Monaco.	
Q209	Turnover for the reporting period realized outside the Principality of Monaco.	
Q210	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	
Q211	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q212	Please provide the total number of new client business relationships (potential clients) that have been rejected due to ML/TF/PF considerations during the reporting period.	
	3.6 Blocked/Rejected Transactions	
Q213	Did you reject block / reject any client transactions (incoming or outgoing) due to concerns about ML/TF/PF during the reporting period?	
Q214	Please provide the total number of blocked/rejected client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period.	
	3.7 Terminated Relationships	
Q215	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q216	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
	3.8 Comments & Feedback	
Q217	Do you have feedback related to any questions in this section?	

Q#	Question Text	Instructions
Q218	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 Q191.** 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	Does your entity have a board and/or senior management?	
C7	Is your entity part of a Group?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance

C#	Question Text	Instructions
		Examples of an entity that does not have a board or senior management: • A sole proprietor • A partnership • A small business with a single layer of management
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 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	Who prepared your entity's Policies and Procedures?	The reporting entity should disclose whether its Policies and Procedures were prepared by the entity themselves or by external advisors? Please select the option that best matches option question: by themselves, by external consultants, by another member of the member group.
C20	Did your entity conduct a self-assessment of adequacy of AML/CFT/CPF procedures?	

C#	Question Text	Instructions
C21	Under art. 33 did you establish internal procedures and did you establish and communicate the report referred to in article 33, L. n° 1.362 ?	
C22	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C23	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C24	Does the board and/or senior management of your entity demonstrate overall responsibility for AML/CFT/CPF?	Actions taken by the Board and/or senior management that could demonstrate board's and senior management's engagement in AML/CFT/CPF matters could include: (1) senior management includes AML/CFT/CPF matters into the daily/ weekly/monthly/quarterly/yearly agenda; (2) senior management receives regular reports on ML/TF risks, trends and vulnerabilities and take immediate decisions to manage and mitigate the risks; (3) senior management requests ad-hoc reporting on AML/CFT/CPF matters whenever issues arise; orders internal or external audit to test AML/CFT/CPF controls; (4) on the basis of internal business wide ML/TF risk assessment results, senior management takes decisions to mitigate higher risks by increasing human resources (hiring more employees for AML/CFT/CPF), buying AML/CFT/CPF monitoring software or sanction screening software, etc.; (5) senior management formally approves written policies, procedures and amendments to them whenever changes to AML/CFT/CPF legislation are introduced; (6) senior management requests regular reports on implementation of risk mitigation measures on the basis of ML/TF risk assessment, internal audit findings, etc.
C25	Does the board and/or senior management of your entity regularly receive AML/CFT/CPF reports?	The reporting entity should disclose whether the board and/or senior management receive regular reports on ML/TF risks and vulnerabilities, trends and overall AML/CFT/CPF compliance. Senior management of the reporting entity, being responsible of overall risk management and control, should also oversee ML/FT risk and trends.
C26	Does the board and/or senior management of your entity ensure that AML/CFT/CPF shortcomings are rectified?	The reporting entity should disclose whether Senior management of the reporting entity, being responsible of overall risk management and control,

C#	Question Text	Instructions
		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.
C27	Does the senior management of your entity review (give approval) for taking on high-risk clients?	In the case of Enhanced Due Diligence, the senior management might be required to approve the business relationships with the higher risk clients (such as PEPs, for example) before entering into the business relationship and/or continuing business relationship. The reporting entity should disclose whether the senior management undertakes these responsibilities.
1.4 Compliance & Violations		
C28	Has your entity had any AML/CFT/CPF related violations in the past 5 years?	The reporting entity should disclose whether it had any AML/CFT/CPF related compliance failures, including minor shortcomings, within the past 5 years.
C29	Please provide the total number of AML/CFT/CPF related violations in the past 5 Years.	Any AML/CFT/CPF related compliance failures, including minor shortcomings, should be counted under this question.
C30	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C31	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C32	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C33	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C34	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C35	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	
C36	Please provide the total number of employees trained on AML/CFT/CPF matters in Reporting Cycle.	

C#	Question Text	Instructions
C37	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
C38	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C39	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C40	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	
C41	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C42	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C43	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C44	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C45	What other AML/CFT/CPF training/awareness raising activities did it include?	
C46	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C47	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C48	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C49	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C50	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C51	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C52	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C53	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C54	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C55	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C56	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	

C#	Question Text	Instructions
C57	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C58	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C59	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C60	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	
	1.6 CDD	
C61	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	
C62	Please specify which items are not collected.	
C63	Does the entity's database contain all of the following, when applicable: • Name • Country of Incorporation • Foundation Date • Administrators/Directors • Beneficial Owner • Legal Representatives • Level of Risk • Representative of Company or Client	
C64	Please specify which items are not collected.	
C65	Does the entity's database contain all of the following, when applicable: • Donors • Founders • Introducers • More Complex Ownership Structures • Person who directly or indirectly exercises control of a Foundation • Protector • Renters of Safe Deposit Boxes • Settlor/Constituent • Shareholders • Trustee	

C#	Question Text	Instructions
C66	Please specify which items are not collected.	
C67	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?
C68	Please specify what other information is included in your database.	
C69	Is past 5 years of client relationship data accessible by AMSF upon request?	
C70	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C71	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C72	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.
C73	Please provide the total number of unique clients that were at some point active during the reporting period.	**Repeat the response from Q4.**
C74	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C75	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C76	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C77	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C78	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C79	Does your entity examine the source of wealth before customer take-on?	
C80	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C81	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
	1.7 EDD	
C82	Did you apply enhanced due diligence measures to clients during the reporting period?	
C83	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C84	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C85	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.
C86	Please provide the total number of Beneficial Owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C87	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	
C88	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C89	How many AML/CFT/CPF risk levels does your entity have for clients?	
C90	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C91	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C92	Do you have clients whose risk level has not yet been determined?	
C93	Please provide the total number of unique clients that are without a risk level determined yet.	
C94	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	
C95	Please specify which items are not considered.	
C96	Does your entity have a tool or process for making clients AML/CFT/CPF risk assessments?	(client assessments)
C97	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)

C#	Question Text	Instructions
C98	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C99	What client activities does your entity associate with High-Risk clients?	
C100	Does your entity consider ML and TF risks separately?	(entity's own assessment)
C101	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
1.9 AMSF Audit		
C102	When did your entity last have a SICCFIN/AMSF audit?	
C103	Has your entity had an on-site AMSF audit?	
C104	Date of last AMSF on-site audit.	
1.10 Cash Transactions		
C105	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C106	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions with clients?	
C107	Please describe the specific controls and procedures for cash transactions with clients your entity applies.	
C108	Does your entity conduct cash transactions by or on behalf of with clients?	
C109	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions made on behalf of clients?	
C110	Please describe the specific controls applied by your entity in case of cash transactions made on behalf of clients.	
1.11 Record Keeping		
C111	Does your entity keep transaction records for at least 5 years?	
C112	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C113	Does your entity keep these records and documents in a safe and secure place?	
C114	Are these records and documents available promptly to the relevant authorities upon request?	When providing its response, the reporting entity should consider the following factors: (1) is the above data collected in electronic format and easily retrievable from the IT systems? (2) does the IT system have the functionality to filter and sort records so that they can be retrieved promptly? (3) is there manual effort required to find clients' data, e.g., if files are stored only in paper format; or, when they are stored in electronic format, IT systems are not configured to enable easy access to the required data.

C#	Question Text	Instructions
C115	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.12 Targeted Financial Sanctions (TFS)		
C116	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).
C117	Are the board and senior management of your entity engaged in overseeing risks and compliance matters related to TFS for terrorist financing and proliferation financing?	The response should capture information on the board's or senior management's involvement in overseeing risks and compliance matters related to Targeted Financial Sanctions implementation. Relevant engagement might include: (1) approval of TFS-related policies, procedures and instructions by the board or senior management; (2) approval (allocation) of financial, technical (IT) or human resources aimed at increasing level of compliance with TFS obligations, such as building employees' knowledge and qualifications in TFS area (trainings, seminars, certificates) and/or hiring additional employees; granting necessary resources to implement automated screening solutions, etc.; (3) periodic reporting on TFS compliance, including sanctions evasion risks, trends and vulnerabilities, (4) arranging internal audits in TFS area and taking timely actions to remedy deficiencies, etc.
C118	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for terrorist financing and proliferation financing?	
C119	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C120	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	

C#	Question Text	Instructions
C121	Does your entity have a system (manual or automated) to check its customer database in accordance with the Sovereign Ordinance no. 8.664 of 26 May 2021?	
C122	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	
C123	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C124	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C125	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
C126	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C127	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
C128	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C129	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C130	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C131	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	
C132	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C133	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary.	
C134	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C135	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	

C#	Question Text	Instructions
C136	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.	
C137	Please provide the total value of assets frozen related to Terrorism Financing within the reporting period.	
C138	Please provide the total value of assets frozen related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
C139	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C140	Please provide the total number of reports made to DBT related to financing of Proliferation of Weapons of Mass Destruction.	
1.13 Politically Exposed Persons (PEPs)		
C141	Does your entity take measures to determine whether clients and beneficial owners are Politically Exposed Persons (PEPs)?	
C142	What measures does your entity apply to determine whether clients and beneficial owners are PEPs?	
C143	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.
C144	Did you enter into any relationships with PEPs during the reporting period?	
C145	Does PEP screening occur as part of the CDD process for new customers?	
C146	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C147	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C148	Does screening for PEPs occur on an ongoing basis?	
C149	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C150	Are PEPs subject to increased monitoring?	
C151	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	

C#	Question Text	Instructions
C152	Does your entity always require senior management approval to onboard a Client or Beneficial Owner 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?	
C153	Among your clientele, are there any individuals who became PEPs during the course of the business relationship during the reporting period?	
1.14 Suspicious Transaction Reporting		
C154	Is your entity registered with goAML?	
C155	Please describe why.	In case the above question is answered “No”.
C156	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C157	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)
C158	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C159	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C160	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).
C161	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).
C162	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C163	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.	
C164	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.
C165	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C166	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C167	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.	

C#	Question Text	Instructions
C168	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C169	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.	
C170	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.v	
C171	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.
C172	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to improve suspicious transaction reporting within the reporting period?	
1.15 Comments & Feedback		
C173	Do you have feedback related to any questions in this section?	
C174	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.