Instructions: 2025 Bailiffs 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 Clients - NPOs 14
1.12 Politically Exposed Persons (PEPs) 14
1.13 Comments & Feedback 15
2 Products & Services Risk 15
2.1 Direct Payments with Clients – Cheques 15
2.2 Direct Payments with Clients - Electronic Transfers 15
2.3 Direct Payments with Clients – Cash 17
2.4 Direct Payments with Clients - Other Payments Forms 18
2.5 Direct Payments with Clients – Summary 18
2.6 Virtual Currencies 18
2.7 Products & Services 18
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 22
3.6 Blocked/Rejected Transactions 22
3.7 Terminated Relationships 22
3.8 Comments & Feedback 23
Instructions, Controls **24**
Controls 24

1.1 Structure 24
1.2 Policies & Procedures 25
1.3 Governance 25
1.4 Compliance & Violations 27
1.5 Training 27
1.6 CDD 29
1.7 EDD 30
1.8 Risk Assessments 31
1.9 AMSF Audit 31
1.10 Cash Transactions 32
1.11 Record Keeping 32
1.12 Targeted Financial Sanctions (TFS) 32
1.13 Politically Exposed Persons (PEPs) 35
1.14 Suspicious Transaction Reporting 35
1.15 Comments & Feedback 37
Instructions, Signatories 38
Signatories 38

Glossary

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

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

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

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

Instructions, Inherent Risk

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

Q#	Question Text	Instructions
Q6	Please provide the total value of 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.
Q7	Please provide the number of clients who are operating in high-risk sectors (as designated by your policies and procedures).	
Q8	Please list the sectors you classify as high-risk sectors.	
1.3 Beneficial Owners		
Q9	Does your entity record Beneficial Owner information?	Information relating to beneficial owners: identification details, addresses, etc.
Q10	For what 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

Q#	Question Text	Instructions
		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. If the nationality is unknown, please select 'Unknown' from the drop-down list.
Q15	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	
Q16	Can your entity distinguish BO's that have 25% or greater ownership?	
Q17	Please provide the total number of Beneficial Owners with 25% or greater ownership, by BO's primary nationality	
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.	

Q#	Question Text	Instructions
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 Organizations (NPOs)?	
1.5 Clients - Natural Persons		
Q26	Does your entity have clients that are Natural Persons?	
Q27	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.
Q28	*# Natural Person Clients*	**Auto-calculated**
Q29	Does your entity record the clients' residency?	
Q30	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the residency of the individual (including domestic clients).	
Q31	*# Natural Person Clients*	**Auto-calculated**
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 value of payments (both incoming and outgoing) with clients that are Natural Persons, in EUR.	
1.6 Clients - Legal Persons		
Q35	Does your entity have clients that are Legal Persons?	
Q36	Please provide the total number of unique clients that are Legal Persons, by client's country of headquarters or incorporation.	
Q37	Please provide the total number of transactions (both incoming and outgoing) with clients that are Legal Persons.	

Q#	Question Text	Instructions
Q38	Please provide the total value of payments (both incoming and outgoing) with clients that are Legal Persons.	
Q39	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
Q40	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.7 Clients - Trusts		
Q41	Does your entity have clients that are Trusts?	
Q42	Please provide the total number of unique clients that are Trusts, broken down by country of Trust formation.	
Q43	Please provide the total number of transactions (both incoming and outgoing) with clients that are Trusts.	
Q44	Please provide the total value of payments (both incoming and outgoing) with clients that are Trusts.	
Q45	Please provide the total number of Monegasque unique clients that are Trusts.	
Q46	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q47	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		
Q48	Does your entity have clients that are Associations?	
Q49	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	
Q50	Does your entity have information related to the number and value of their transactions?	
Q51	Please provide the total number of transactions (both incoming and outgoing) with clients that are Associations.	

Q#	Question Text	Instructions
Q52	Please provide the total value of payments (both incoming and outgoing) with clients that are Associations.	
1.9 Clients - Other Legal Arrangements		
Q53	Does your entity have clients that are Other Legal Arrangements?	
Q54	Please provide the total number of unique clients that are Other Legal Arrangements, broken down by country of establishment / formation.	
Q55	Does your entity have information related to the number and value of their transactions?	
Q56	Please provide the total number of transactions (both incoming and outgoing) with clients that are Other Legal Arrangements.	
Q57	Please provide the total value of payments with clients that are Other Legal Arrangements, both incoming and outgoing.	
Q58	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		
Q59	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.
Q60	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).	
Q61	Please provide the total number of transactions with clients that are HNWIs or individuals belonging to a HNW Group, both incoming and outgoing.	
Q62	Please provide the total value of funds transferred with clients that are HNWIs or individuals belonging to a HNW Group, both incoming and outgoing.	
Q63	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.	
Q64	Please provide the total number of unique beneficial owners of Legal Arrangements clients (that are not Trusts) that are HNWIs, broken down by the primary nationality of the HNWI.	
Q65	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.
Q66	Please provide the total number of unique clients that are UHNWIs or individuals belonging to a UHNW	

Q#	Question Text	Instructions
	Group, broken down by the primary nationality of the client (including domestic clients).	
Q67	Please provide the total number of transactions with clients that are UHNWIs or individuals belonging to a UHNW Group, both incoming and outgoing.	
Q68	Please provide the total value of funds transferred with clients that are UHNWIs or individuals belonging to a UHNW Group, both incoming and outgoing.	
Q69	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.	
Q70	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		
Q71	Does your entity have clients that are Non-Profit Organizations?	
Q72	Please provide the total number of unique clients that are NPOs.	
Q73	Please provide the total number of Monegasque unique clients that are NPOs.	
1.12 Politically Exposed Persons (PEPs)		
Q74	Does your entity have any Politically Exposed Persons (PEPs) as clients?	
Q75	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients).	
Q76	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients).	
Q77	Please provide the total number of transactions with clients that are PEPs, both incoming and outgoing.	
Q78	Please provide the total value of payments (both incoming and outgoing) with clients that are PEPs.	
Q79	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.
Q80	Please provide the total number of transactions (both incoming and outgoing) with Beneficial Owners of Legal Person/Trust/Legal Arrangement clients that are PEPs.	

Q#	Question Text	Instructions
Q81	Please provide the total value of payments (both incoming and outgoing) with Beneficial Owners of Legal Person/Legal Arrangement clients that are PEPs.	
1.13 Comments & Feedback		
Q82	Do you have feedback related to any questions in this section?	
Q83	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.		
Q84	Does your entity accept or make Cheque transactions with clients?	
Q85	Did your entity accept or make Cheque transactions with clients within the reporting period?	
Q86	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**
Q87	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		
Q88	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

Q#	Question Text	Instructions
		debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q89	Did your entity accept or make transactions by Electronic Transfer with clients within the reporting period?	
Q90	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**
Q91	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**
Q92	Does your entity accept Credit Card transactions with clients?	
Q93	Did your entity accept or make transactions by Credit Card with clients within the reporting period?	
Q94	Among the electronic transfers reported, please provide the total number of Credit Card transactions with clients, within the reporting period.	
Q95	*Total number of transactions by Electronic Transfer*	**Auto-calculated**
Q96	Please provide the total value of Credit Card payments with clients, within the reporting period.	
Q97	*Total value of payments by Electronic Transfer*	**Auto-calculated**

Q#	Question Text	Instructions
2.3 Direct Payments with Clients – Cash		
Q98	Does your entity accept or make Cash transactions with clients?	
Q99	Did your entity accept or make Cash transactions with clients within the reporting period?	
Q100	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**
Q101	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**
Q102	Does your entity accept or make Foreign Currency Cash transactions with clients?	
Q103	Please provide the total value of payments in Cash with clients, in currency other than EUR, during the reporting period, both incoming and outgoing.	
Q104	Please provide the total number of single cash transactions equal or exceeding 10,000 EUR within the reporting period, both incoming and outgoing.	
Q105	Can your entity distinguish cash transactions in excess of EUR 100,000 in your record keeping?	

Q#	Question Text	Instructions
Q106	Number of transactions in cash by Natural Persons in excess of EUR 100,000 during the reporting period, both incoming and outgoing.	
Q107	Number of transactions in cash by Monegasque Legal Persons in excess of EUR 100,000 during the reporting period, both incoming and outgoing.	
Q108	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		
Q109	Does your entity use any other payment types with clients?	
Q110	Which other payment types?	
Q111	Please provide the total number of other transactions with clients, both incoming and outgoing.	
Q112	Please provide the total value of other payments with clients, within the reporting period.	
2.5 Direct Payments with Clients – Summary		
Q113	*Sum of # transactions with clients*	**Auto-calculated**
Q114	*# Transactions with clients (Repeat of Q5)*	**Repeat field, used for data validation. Auto-calculated**
Q115	*Sum of value payments with clients*	**Auto-calculated**
Q116	*Value payments with clients (Repeat of Q6)*	**Repeat field, used for data validation. Auto-calculated**
2.6 Virtual Currencies		
Q117	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.
Q118	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q119	Please name the Virtual Asset Platforms or Intermediaries, that your entity has business relationships with.	This should include not only virtual assets related payments received or investments directly, but also payments involving third parties (agents, intermediaries, VASPs, etc.).
2.7 Products & Services		
Q120	Does your entity provide services related to managing of client money, securities or other assets or management of banks, savings, or securities accounts?	
Q121	Does your entity hold funds on trust, or in another fiduciary capacity for customers through a client account?	
Q122	Does your entity accept or make transactions by or on behalf of clients?	
Q123	Does your entity engage or advise on mergers and acquisitions of companies?	
Q124	Do you accept payments from unassociated or unknown third parties?	

Q#	Question Text	Instructions
Q125	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)?	
2.8 Comments & Feedback		
Q126	Do you have feedback related to any questions in this section?	
Q127	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q128	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.
Q129	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.	
Q130	Does your entity rely on foreign third parties to undertake some/all CDD measures towards clients?	
Q131	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.
Q132	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		
Q133	Did your entity onboard clients within the reporting period?	
Q134	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.
Q135	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.
Q136	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.

Q#	Question Text	Instructions
		New clients are those who were not clients during the previous reporting period.
Q137	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.
Q138	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.
Q139	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.
Q140	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.
Q141	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.
Q142	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.
Q143	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.
Q144	Can the entity provide client nationality information for clients onboarded through introducers?	
Q145	Can the entity provide introducers residency information?	
Q146	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.
Q147	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.
Q148	*Difference between number of clients onboarded by nationality by vs. by 3rd Parties, Reporting Period.*	**Validate your inputs**, when correctly entered, the total between these should be '0'. **If this is not the case, please modify your answers.**

Q#	Question Text	Instructions
Q149	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.
Q150	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.
Q151	*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		
Q152	What is the legal form of your entity?	• Commercial Partnership SNC • Economic Interest Group GIE • Joint Stock Company SAM • Limited Liability Companies SARL • Limited Partnership SCS • Limited Partnership with Shares SCA • Monegasque Foundation • Monegasque Associations • Other Civil Companies SC-Autre • Other Commercial Companies • Other Legal Arrangements • Private Domain of the Monegasque State • Property Investment Partnership SCI • Sole Person • Special Civil-law Partnership SCP • Trusts
Q153	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.
Q154	Does your entity have any branches, subsidiaries, or agencies?	
Q155	Please provide the total number of branches, subsidiaries, and agencies of the licensed domestic entity, broken down by country.	For the purpose of this question, branch should be understood as a secondary establishment of the parent company. Please do not include offices/client service locations which are sometimes informally referred to as "branches".
Q156	Is your entity a branch or subsidiary of another entity?	
Q157	Is your entity a branch or subsidiary of a foreign entity?	
Q158	In which country is the parent undertaking?	
Q159	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q160	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)	

Q#	Question Text	Instructions
Q161	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.	
Q162	Is your entity part of an international business network or group?	
Q163	Please specify which international business network or group.	
Q164	Is your entity a member of a professional association?	
Q165	Please specify.	
Q166	Does your entity work with agents located abroad?	
Q167	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?
Q168	Please indicate the development or modification.	
3.4 Entity Finances		
Q169	Turnover for the reporting period.	
Q170	Turnover for the reporting period realized in the Principality of Monaco.	
Q171	Turnover for the reporting period realized outside the Principality of Monaco.	
Q172	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		
Q173	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q174	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		
Q175	Did you block/reject client transactions (both incoming and outgoing) due to ML/TF/PF considerations during the reporting period?	
Q176	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		
Q177	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	

Q#	Question Text	Instructions
Q178	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		
Q179	Do you have feedback related to any questions in this section?	
Q180	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 Q147.** The reporting entity should disclose the number of employees, partners, and owners irrespective of their function. The number at the end of the reporting period should be used.
C2	Please provide the total number of full-time equivalent persons working at your entity, at the end of the reporting period.	The reporting entity should disclose the number of full-time equivalent persons, including salaried and non-salaried persons including, where applicable, managers, partners or owner-operators irrespective of their function. Provide the estimate as a decimal of FTE time. For example if there is one full time person and two ¼ time persons, then the total would be 1.5 FTE. 1 full-time person = 1 FTE. One half-time person = 0,5 FTE. One ¼ time person = 0,25 FTE.
C3	Please provide the number of full-time equivalent persons in AML/CFT/CPF Compliance at your entity, at the end of the reporting period.	
C4	Approximately how many hours were spent on AML/CFT/CPF per month?	
C5	Is your entity part of a Group?	
C6	Does your entity have a board and/or senior management?	This question distinguishes if the entity is of a sufficient size to have separated either governance or functions of responsibility. Examples of a board or senior management, would be an entity having: • Chief Officers (CEO, CFO, CTO…) • Distribution of decision-making authority, such as given by a Director or when more than one layer of management exists • Policies or procedures which require approval by a specified role or individual • A legal requirement for a board or specific role needed to achieve compliance Examples of an entity that does not have a board or senior management: • A sole proprietor • A partnership

C#	Question Text	Instructions
		• A small business with a single layer of management
C7	Do you use external service providers for AML/CFT/CPF?	
C8	What is the purpose of your contract with these external service providers?	
C9	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.	
C10	Approximately how many hours do external service providers spend each month on AML/CFT/CPF compliance?	
1.2 Policies & Procedures		
C11	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.
C12	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).
C13	Did your entity circulate these policies and procedures to all its employees?	This includes employees at your entity plus non-employee partners and owners.
C14	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.
C15	Did your entity update their written AML/CFT/CPF policies and procedures in the last year?	
C16	Please provide the date of the last update to your entity's written AML/CFT/CPF policies and procedures.	
C17	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.
C18	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.
C19	Did your entity conduct a self-assessment of adequacy of AML/CFT/CPF procedures?	
1.3 Governance		
C20	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

C#	Question Text	Instructions
		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.
C21	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.
C22	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

C#	Question Text	Instructions
		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.
C23	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		
C24	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.
C25	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.
C26	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C27	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C28	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C29	Did your entity conduct AML/CFT/CPF training for its client-facing employees in the reporting period?	
C30	Did your entity conduct AML/CFT/CPF training for its non-client-facing employees in the reporting period?	
C31	Did your entity conduct AML/CFT/CPF training for its Compliance Employees in the reporting period?	
C32	Please provide the total number of persons trained on AML/CFT/CPF matters during the reporting cycle.	
C33	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
C34	Did any of the AML/CFT/CPF training/awareness raising activities include Dissemination of supporting documents (legal texts, procedures, guidance…)?	
C35	Did any of the AML/CFT/CPF training/awareness raising activities include Internal Meetings?	
C36	Did any of the AML/CFT/CPF training/awareness raising activities include Consultation of AMSF's Website?	

C#	Question Text	Instructions
C37	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider in Monaco?	
C38	Did any of the AML/CFT/CPF training/awareness raising activities include Training with External Service Provider outside Monaco?	
C39	Did any of the AML/CFT/CPF training/awareness raising activities include Training by Another Group Member?	
C40	Did any of the AML/CFT/CPF training/awareness raising activities include any Other Activities?	
C41	What other AML/CFT/CPF training/awareness raising activities did it include?	
C42	Did any of the training/awareness raising activities cover topics related to Internal AML Procedures?	
C43	Did any of the training/awareness raising activities cover topics related to Internal CFT Procedures?	
C44	Did any of the training/awareness raising activities cover topics related to Group AML Procedures?	
C45	Did any of the training/awareness raising activities cover topics related to Group CFT Procedures?	
C46	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Typologies?	
C47	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Practical Cases?	
C48	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to News?	
C49	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Corruption?	
C50	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing of Terrorism?	
C51	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Cryptocurrency?	
C52	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Financing the Proliferation of Weapons of Mass Destruction?	
C53	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Tax Evasion?	
C54	Did any of the AML/CFT/CPF training/awareness raising activities cover topics related to Fraud?	
C55	Did any of the AML/CFT/CPF training/awareness raising activities cover other topics not mentioned above?	
C56	What other topics did the AML/CFT/CPF training/awareness raising activities cover?	

C#	Question Text	Instructions
	1.6 CDD	
C57	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	
C58	Please specify which items are not collected.	
C59	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	
C60	Please specify which items are not collected.	
C61	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	
C62	Please specify which items are not collected.	
C63	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,

C#	Question Text	Instructions
		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?
C64	Please specify what other information is included in your database.	
C65	Is past 5 years of client relationship data accessible by AMSF upon request?	
C66	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C67	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C68	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.
C69	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.**
C70	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C71	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C72	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C73	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C74	How often is ongoing due diligence done on clients classified as High-Risk for ML/FT?	
C75	Does your entity examine the source of wealth before customer take-on?	
C76	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C77	Please specify other measures taken for high-risk clients, before customer take-on.	
1.7 EDD		
C78	Did you apply enhanced due diligence measures to clients during the reporting period?	
C79	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C80	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	

C#	Question Text	Instructions
C81	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.
C82	Please provide the total number of beneficial owners of Legal Persons and Legal Arrangements where enhanced due diligence was applied.	
C83	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		
C84	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C85	How many AML/CFT/CPF risk levels does your entity have for clients?	
C86	Did you have clients presenting a high risk in terms of AML/CFT/CPF during the reporting period?	
C87	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C88	Do you have clients whose risk level has not yet been determined?	
C89	Please provide the total number of unique clients that are without a risk level determined yet.	
C90	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	
C91	Please specify which items are not considered.	
C92	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(client assessments)
C93	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C94	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C95	What client activities does your entity associate with High-Risk clients?	
C96	Does your entity have a tool or process for making AML/CFT/CPF risk assessments?	(entity's own assessment)
C97	Does your entity consider ML and TF risks separately?	(entity's own assessment)
1.9 AMSF Audit		
C98	When did your entity last have a SICCFIN/AMSF audit?	

C#	Question Text	Instructions
C99	Has your entity had an on-site AMSF audit?	
C100	Date of last AMSF on-site audit.	
1.10 Cash Transactions		
C101	Does your entity conduct cash transactions with clients?	Both incoming and outgoing payments.
C102	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions with clients?	
C103	Please describe the specific controls and procedures for cash transactions with clients your entity applies.	
C104	Does your entity conduct cash transactions by or on behalf of with clients?	
C105	Does your entity apply any specific AML/CFT/CPF controls and procedures for cash transactions made on behalf of clients?	
C106	Please describe the specific controls applied by your entity in case of cash transactions made on behalf of clients.	
1.11 Record Keeping		
C107	Does your entity keep transaction records for at least 5 years?	
C108	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C109	Does your entity keep these records and documents in a safe and secure place?	
C110	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.
C111	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.12 Targeted Financial Sanctions (TFS)		
C112	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.

C#	Question Text	Instructions
		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).
C113	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.
C114	Does your entity have policies and procedures regarding direct and indirect control of assets of TFS designated persons for terrorist financing and proliferation financing?	
C115	Does your entity have policies and procedures regarding freezing the assets (without delay) of TFS designated persons and reporting it to competent authority(ies)?	
C116	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C117	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?	
C118	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for representative of company or client (mandataires)?	

C#	Question Text	Instructions
C119	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for beneficial owners (and beneficiaries)?	
C120	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for administrators/directors?	
C121	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for shareholders?	
C122	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for legal representatives?	
C123	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for settlor/constituent?	
C124	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for trustees?	
C125	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for protectors?	
C126	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for introducers?	
C127	How frequently does your entity undertake regular screenings (terrorism, proliferation, financial sanctions) for clients with More Complex Ownership Structures?	
C128	Do you have clients which have chains of payments to or from Ultimate Beneficiaries?	
C129	Does your entity undertake screenings (terrorism, proliferation, financial sanctions) on subjects relevant to the full chain of payments to the ultimate beneficiary.	
C130	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C131	Please provide the total number of persons identified by your entity related to Terrorism Financing within the reporting period.	
C132	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.	
C133	Please provide the total value of assets frozen (in EUR) related to Terrorism Financing within the reporting period.	

C#	Question Text	Instructions
C134	Please provide the total value of assets frozen (in EUR) related to financing of Proliferation of Weapons of Mass Destruction within the reporting period.	
C135	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C136	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)		
C137	Does your entity take measures to determine whether clients and Beneficial Owners are Politically Exposed Persons (PEPs)?	
C138	What measures does your entity apply to determine whether clients and Beneficial Owners are PEPs?	
C139	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.
C140	Did you enter into any relationships with PEPs during the reporting period?	
C141	Does PEP screening occur as part of the CDD process for new customers?	
C142	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C143	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C144	Does screening for PEPs occur on an ongoing basis?	
C145	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C146	Are PEPs subject to increased monitoring?	
C147	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	
C148	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		
C149	Is your entity registered with goAML?	
C150	Please describe why.	In case the above question is answered “No”.
C151	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	

C#	Question Text	Instructions
C152	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)
C153	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C154	Please provide the total number of STRs/ SARs submitted to the FIU within the reporting period.	
C155	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).
C156	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).
C157	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C158	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.	
C159	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.
C160	Please provide the total number of STRs/SARs related to a Foreign Legal Person provided to the FIU within the reporting period.	
C161	Please provide the total number of STRs/SARs related to a Foreign Trust provided to the FIU within the reporting period.	
C162	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.	
C163	Please provide the total number of STRs/SARs related to Organized Crime provided to the FIU within the reporting period.	
C164	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.	
C165	Please provide the total number of unsuccessful transactions attempts reported to the FIU, within the reporting period.	
C166	Did your entity respond internally to the suspicious transactions?	e.g. modification of the client relationship as a result, reevaluated client risk classification, taking steps to avoid tipping-off, etc.
C167	Did your entity take any steps to strengthen internal controls for AML/CFT/CPF, amend policies and procedures, or undertake other procedures to	

C#	Question Text	Instructions
	improve suspicious transaction reporting within the reporting period?	
1.15 Comments & Feedback		
C168	Do you have feedback related to any questions in this section?	
C169	Please provide comments or feedback on this section here.	

Instructions, Signatories

S#	Question Text	Instructions
Signatories		
S1	The person or persons name(s) added here attests that she/he/they have provided accurate responses to questions, to the best of their ability.	
S2	The person's name added here attests that she/he is duly authorized to represent the reporting entity and has ensured the submitted data has been adequately reviewed and is an accurate representation, to the best of their ability.	
S3	Do you need to submit your survey in an Incomplete state?	If no, please write 'Complete'. If yes, provide the reason for submitting incomplete. An incomplete submission may result in enhanced oversight or other action.