Instructions: 2025 Property Dealers AML/CFT/CPF Survey

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

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

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

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

- Responses must include all products or services offered to customers that fall within the scope of the AML/CFT/CPF regulations in force in Monaco.
- The reporting period is 1st January 2025 to 31th December 2025.
- Questions related to number of clients shall include clients that are active at the end of the reporting period and clients that were at some point active during the reporting period.
- The term 'unique clients' denotes that while a client may be involved in multiple services, engagements, files, mandates or transactions, they should still be counted as a single client.
- For the purposes of the survey, the entity must record the number of parties (purchaser, co-purchaser, seller, co-seller) to transactions carried out during the period requested.
- Questions related to number or value of transactions are relevant for activity performed within the reporting period.
- 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.

Please provide answers ONLY for activities in which you or your entity have acted as a professional within the meaning of amended Law No. 1.362 in relation to the purchase, sale, or rental of real estate (only for rentals with a monthly rent equal to or greater than €10,000 including VAT), UNLESS the question specifies otherwise.

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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.
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 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

Term	Definition
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 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,

Term	Definition
	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.
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.

Term	Definition
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	Over the past five years, have you carried out at least one of the activities subject to Law No. 1.362? Activities concerned: • purchases or resales involving real estate • purchases or resales of business assets • purchases or resales of shares/stocks in civil companies	See link here
Q2	Please specify the reason why no activity was carried out during the last five years.	When no is answered above.
Q3	Within the reporting period, have you carried out at least one of the activities subject to Law No. 1.362? Activities concerned: • purchases or resales involving real estate • purchases or resales of business assets • purchases or resales of shares/stocks in civil companies	See link here
Q4	Please specify the reason why no activity was carried out during the reporting period.	When no is answered above.
1.2 Clients Summary		
Over the past five years		
Q5	Please provide the total number of unique clients that were at some point active over the past five years, 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.
Q6	*Total number of clients - last 5 years*	**Auto-calculated field**
Q7	Please provide the total number of purchases and resales carried out with clients, broken down by	

Q#	Question Text	Instructions
	client's primary nationality, or country of headquarters or incorporation, over the past five years.	
Q8	Please provide the total value of purchases and resales carried out with clients, broken down by client's primary nationality, or country of headquarters or incorporation, over the past five years	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.
During the reporting period		
Q9	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.	
Q10	*Total number of clients - reporting period*	
Q11	Please provide the total number of purchases and resales carried out with clients, broken down by client's primary nationality, or country of headquarters or incorporation, within the reporting period.	
Q12	*Total number of purchases and resales - reporting period*	
Q13	Please provide the total value of purchases and resales carried out with clients, broken down by client's primary nationality, or country of headquarters or incorporation, during the reporting period.	
Q14	*Total value of purchases and resales - reporting period*	
Q15	Have you carried out any purchases or resales directly with clients (without going through an intermediary) during the reporting period?	
Q16	Please provide the total number of unique clients, that were at some point active during the reporting period and with whom you directly concluded purchases and resales without the involvement of a third party (excluding notary).	
Q17	Please provide the total number of purchases and resales carried out directly with clients, without the involvement of a third party (excluding notary) within the reporting period.	
Q18	Please provide the total value of purchases and resales carried out directly with clients, without the involvement of a third party (excluding notary) during the reporting period.	
Q19	Have you carried out any purchases or resales with a third party acting as an intermediary (excluding notary)?	
Q20	Please provide the total number of unique intermediaries (excluding notary), with whom you carried out purchases and resales during the reporting period.	

Q#	Question Text	Instructions
Q21	Please provide the total number of purchases and resales carried out with a third party (excluding notary) within the reporting period.	
Q22	Please provide the total value of purchases and resales carried out with a third party (excluding notary) during the reporting period.	
1.3 Beneficial Owners		
Q23	Does your entity record Beneficial Owner information?	Information relating to beneficial owners: identification details, addresses, etc.
Q24	For what conditions does your entity record Beneficial Owner information?	
Q25	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).
Q26	Can your entity distinguish nationality of clients' Beneficial Owners?	Indicate whether or not your entity is able to make the distinction.
Q27	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.
Q28	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.

Q#	Question Text	Instructions
Q29	Please provide the total number of Beneficial Owners that represent a legal entity, broken down by primary nationality.	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.
Q30	Can your entity distinguish BO's that have 25% or greater ownership?	
Q31	Please provide the total number of Beneficial Owners by BO's primary nationality, for BO's with 25% or greater ownership.	
Q32	For Beneficial Owners of clients with 25% or greater ownership, does your entity record the residency?	Indicate whether or not your entity registers residence.
Q33	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.	
Q34	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:		
Q35	HNWI's?	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.
Q36	UHNWI's?	
Q37	Trusts and Other Legal Arrangements?	
Q38	Virtual Assets Service Providers (VASPs)?	
1.5 Clients - Natural Persons		
Q39	Have you carried out any purchases or resales that are Natural Persons during the reporting period?	
Q40	Please provide the total number of unique clients that are Natural Persons (individuals) broken down by the primary nationality of the individual.	If a Natural Person (individual) acts on behalf of a Legal Person or Arrangement, that person **should not** be counted as a Natural Person client. If you have a total of 2 clients, you must find 2 clients, even if the breakdown is different. Example: • Individuals broken down by nationality: 2 clients → 1 Swiss, 1 Japanese

Q#	Question Text	Instructions
		• Individuals broken down by residence: 2 clients → 2 residents of Monaco The total number remains the same: 2 clients.
Q41	# Natural Person Clients	**Auto-calculated**
Q42	Please provide the total number of unique clients that are Natural Persons that are Nationals.	
Q43	Please provide the total number of unique clients that are Natural Persons that are Foreign Residents.	
Q44	Please provide the total number of unique clients that are Natural Persons that are Non-Residents.	
Q45	Please provide the total number of purchases and resales carried out with clients that are Natural Persons.	
Q46	Please provide the total value of purchases and resales carried out with clients that are Natural Persons	
1.6 Clients - Legal Persons		
Q47	Have you carried out any purchases or resales that are Legal Persons during the reporting period?	
Q48	Please provide the total number of unique clients that are Legal Persons, broken down by country of headquarters or incorporation	
Q49	Please provide the total number of purchases and resales carried out with clients that are Legal Persons.	
Q50	Please provide the total value of purchases and resales carried out with clients that are Legal Persons.	
Q51	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
Q52	Please provide the number of Monegasque Legal Persons as clients, by type.	
1.7 Clients - Associations		
Q53	Have you carried out any purchases or resales that are Associations during the reporting period?	
Q54	Please provide the total number of unique clients that are Associations, broken down by country of Association formation.	

Q#	Question Text	Instructions
Q55	Please provide the total number of purchases and resales carried out with clients that are Associations.	
Q56	Please provide the total value of purchases and resales carried out with clients that are Associations.	
1.8 Clients - Trusts and Other Legal Arrangements		
Q57	Have you carried out any purchases or resales with client that are Trusts or Other Legal Arrangements?	
Q58	Please provide the total number of unique clients that are Trusts and Other Legal Arrangements.	
Q59	Please provide the total number of Monegasque unique clients that are Trusts and Other Legal Arrangements.	
Q60	Please provide the total number of Natural Persons which are trustees in their professional capacity, broken down by primary nationality.	
Q61	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.	
Q62	Does your entity have information related to the number and value of their transactions?	
Q63	Please provide the total number of purchases and resales carried out with clients that are Trusts and Other Legal Arrangements.	
Q64	Please provide the total value of purchases and resales carried out with clients that are Trusts and Other Legal Arrangements.	
Q65	Please specify the type of any Other Legal Arrangements clients not mentioned in the previous questions that your entity has as clients.	
1.9 HNWI's and UHNWI's		
Q66	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.
Q67	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).	
Q68	Please provide the total number of purchases, sales and rentals of real estate with clients that are HNWIs or individuals belonging to a HNW Group.	
Q69	Please provide the total value of purchases, sales and rentals of real estate with clients that are HNWIs or individuals belonging to a HNW Group (both incoming and outgoing).	
Q70	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.	

Q#	Question Text	Instructions
Q71	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.
Q72	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).	
Q73	Please provide the total number of purchases, sales and rentals of real estate with clients that are UHNWIs or individuals belonging to a UHNW Group.	
Q74	Please provide the total value of purchases, sales and rentals of real estate with clients that are UHNWIs or individuals belonging to a UHNW Group (both incoming and outgoing).	
Q75	Please provide the total number of unique Beneficial Owners of Legal Person clients that are UHNWIs, broken down by the primary nationality of the UHNWI.	
1.10 Politically Exposed Persons (PEPs)		
Q76	Do you have any PEPs as clients?	
Q77	Please provide the total number of unique clients that are PEPs, broken down by the residency of the PEP (including domestic clients)	
Q78	Please provide the total number of unique clients that are PEPs, broken down by the primary nationality of the PEP (including domestic clients)	
Q79	Please provide the total number of purchases and resales with clients that are PEPs.	
Q80	Please provide the total value of purchases and resales with clients that are PEPs in EUR.	
Q81	Please provide the total number of unique Beneficial Owners of Legal Person/Trusts and 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.
Q82	Please provide the total number of of purchases and resales carried out by Beneficial Owners of Legal Person/Trusts and Other Legal Arrangement clients that are PEPs.	
1.11 2nd Nationalities		
Q83	For clients with Multiple/dual citizenships, does your entity register all nationalities of a client?	

Q#	Question Text	Instructions
Q84	Please provide the total number of secondary nationalities of Natural Person clients, broken down by secondary nationalities of the client, if applicable (including domestic clients).	
1.12 Virtual Asset Service Providers		
Q85	Does your entity have clients that are VASPs?	
Q86	Does your entity distinguish if VASPs clients are Custodian Wallet Providers?	Custodian Wallet Providers
Q87	Does your entity have clients that are Custodian Wallet Providers?	Custodian Wallet Providers
Q88	Please provide the total number of unique VASP clients that are Custodian Wallet Providers, broken down by country of establishment.	Custodian Wallet Providers
Q89	Please provide the total number of purchases and resales carried out with VASP clients that are Custodian Wallet Providers.	Custodian Wallet Providers
Q90	Please provide the total value of purchases and resales carried out with VASP clients that are Custodian Wallet Providers.	Custodian Wallet Providers
Q91	Does your entity distinguish if VASPs clients are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q92	Does your entity have clients that are Virtual Currency Exchange Providers?	Virtual Currency Exchange Providers
Q93	Please provide the total number of unique VASP clients that are Virtual Currency Exchange Providers, broken down by country of establishment.	Virtual Currency Exchange Providers
Q94	Please provide the total number of purchases and resales carried out with VASP clients that are Virtual Currency Exchange Providers.	Virtual Currency Exchange Providers
Q95	Please provide the total value of purchases and resales carried out with VASP clients that are Virtual Currency Exchange Providers.	Virtual Currency Exchange Providers
Q96	Does your entity distinguish if VASPs clients are ICO related service providers?	ICO
Q97	Does your entity have clients that are Initial Coin Offering Providers?	ICO
Q98	Please provide the total number of unique VASP clients that are ICO related services, broken down by country of establishment.	ICO
Q99	Please provide the total number of purchases and resales carried out with VASP clients that are ICO related service providers.	ICO
Q100	Please provide the total value of purchases and resales carried out with VASP clients that are ICO related service providers.	ICO
Q101	Does your entity distinguish if VASPs clients provide Other Services not mentioned above?	Other Services
Q102	Does your entity have clients that are engaged in Other VASP Services?	Other Services

Q#	Question Text	Instructions
Q103	Please provide the total number of unique VASP clients that provide Other Services, broken down by country of establishment.	Other Services
Q104	Please provide the total number of purchases and resales carried out with VASP clients related to Other Services.	Other Services
Q105	Please provide the total value of purchases and resales carried out with VASP clients that provide Other Services.	Other Services
Q106	Please specify what Other Services VASP clients are providing not mentioned above.	Other Services
1.13 Monegasque Client Types - Purchases and Sales		
Q107	Did you have any Monegasque clients in the reporting period?	
Q108	Please provide the total number of Monegasque unique clients that are Lawyers and Other Legal Professions.	
Q109	Please provide the total number of Monegasque unique clients that are Auditors/Accountants.	
Q110	Please provide the total number of Monegasque unique clients that are Nominee Shareholders / Directors.	
Q111	Please provide the total number of Monegasque unique clients that are Issuers, Users, or Providers of Bearer Shares or Other Bearer Instruments.	
Q112	Please provide the total number of Monegasque unique clients that are Real Estate Agents.	
Q113	Please provide the total number of Monegasque unique clients that are DPMS.	
Q114	Please provide the total number of Monegasque unique clients that are TCSPs.	
Q115	Please provide the total number of Monegasque unique clients that are Multi-Family Offices.	
Q116	Please provide the total number of Monegasque unique clients that are Single-Family Offices.	
Q117	Please provide the total number of Monegasque unique clients with More Complex Ownership Structures.	
Q118	Please provide the total number of Monegasque unique clients that are engaged in Cash Intensive Business.	
Q119	Please provide the total number of Monegasque unique clients that are providers of or accept payments from Anonymous Prepaid Cards / Cards with a high CDD Threshold.	
Q120	Please provide the total number of Monegasque unique clients that are engaged in Art and Antiques.	
Q121	Please provide the total number of Monegasque unique clients that are engaged in Import-Export.	

Q#	Question Text	Instructions
Q122	Please provide the total number of Monegasque unique clients that are engaged in dealing with High-Value Goods.	
Q123	Please provide the total number of Monegasque unique clients that are NPOs.	
Q124	Please provide the total number of Monegasque unique clients that are engaged in Casinos/Gambling.	
Q125	Please provide the total number of Monegasque unique clients that are engaged in Construction/Real Estate Development.	
Q126	Please provide the total number of Monegasque unique clients that are engaged in Extractive Industries.	
Q127	Please provide the total number of Monegasque unique clients that are engaged in Defense/Arms.	
Q128	Please provide the total number of Monegasque unique clients that are engaged in Yachting-related Business.	
Q129	Please provide the total number of Monegasque unique clients that are Sports Agents or Intermediaries.	
Q130	Please provide the total number of Monegasque unique clients that are engaged in Fund Management.	
Q131	Please provide the total number of Monegasque unique clients that are Holding Companies.	
Q132	Please provide the total number of Monegasque unique clients that are Auctioneers.	
Q133	Please provide the total number of Monegasque unique clients that are Motor Vehicle Dealers.	
Q134	Please provide the total number of Monegasque unique clients that are Government and Public Sector.	
Q135	Please provide the total number of Monegasque unique clients that are engaged in Aircraft Sales / Private Jets / Charters.	
Q136	Please provide the total number of Monegasque unique clients that are engaged in Shipping.	
1.14 Comments & Feedback		
Q137	Do you have feedback related to any questions in this section?	
Q138	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.		
Q139	Does your entity accept or make payments by cheque with clients?	
Q140	Did your entity accept or make payments by Cheque with clients within the reporting period?	

Q#	Question Text	Instructions
Q141	Please provide the total number of payment by cheque (both incoming and outgoing) with clients.	Example: A counterparty pays you in three separate instalments spread over two years: • Payment no. 1: €40,000 by cheque → made in 2025 • Payment no. 2: €40,000 by cheque → made in 2025 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
Q142	Please provide the total value of payment (both incoming and outgoing) by cheque with clients.	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		
Q143	Does your entity accept or make payments by Electronic Transfers with clients?	Electronic transfers include payments originating in an electronic form, such as wire transfers, direct debits, payments services providers (PSP) such as PayPal or Carlo, debit cards, credit cards, virtual currency payments, etc.
Q144	Did your entity accept or make payments by Electronic Transfer with clients within the reporting period?	
Q145	Please provide the total number of payment by Electronic Transfer (both incoming and outgoing) with clients.	Example: A counterparty pays you in three separate instalments spread over two years: • Payment no. 1: €40,000 by 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.

Q#	Question Text	Instructions
		2025 reporting period: Total number of transactions by electronic transfer: 2
Q146	Please provide the total value of payments (both incoming and outgoing) by Electronic Transfer with clients.	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
Q147	Does your entity accept Credit Card transactions with clients?	
Q148	Did your entity accept or make transactions by Credit Card with clients within the reporting period?	
Q149	Among the electronic transfers reported, please provide the total number of Credit Card transactions with clients, within the reporting period.	
Q150	Please provide the total value of Credit Card payments with clients, within the reporting period.	
2.3 Direct Payments with Clients – Cash		
Q151	Does your entity accept or make payments in Cash with clients?	
Q152	Did your entity accept or make payments in Cash with clients within the reporting period?	
Q153	Please provide the total number of payments (both incoming and outgoing) in Cash with clients.	Example: A counterparty pays you in three separate instalments spread over two years: • Payment no. 1: €10,000 in cash → made in 2025 • Payment no. 2: €40,000 by cheque → made in 2025 • Payment no. 3: €30,000 by electronic transfer → made in 2026 Only transactions carried out during the reporting period are to be recorded. 2025 reporting period: Total number of cash transactions: 1

Q#	Question Text	Instructions
Q154	Please provide the total value of payments (both incoming and outgoing) in Cash with clients.	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: €50,000 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
Q155	Please provide the total value of payments (both incoming and outgoing) in cash in currencies other than the Euro, with clients.	
Q156	Please provide the total number of payments in cash equal to or greater than 10,000 euros (both incoming and outgoing) with clients.	
2.4 Direct Payments with Clients - Other Payment Types		
Q157	Does your entity use any other payment types with clients?	
Q158	Please provide the total number of transactions by other payment types with clients, within the reporting period.	
Q159	Please provide the total value of Other Payments Types with clients, within the reporting period.	
Q160	Which other payment types?	
2.5 Direct Payments with Clients – Summary		
Q161	*Sum of # number of payments with clients*	**Auto-calculated**
Q162	*Sum of value payments with clients*	**Auto-calculated**
2.6 Virtual Currencies		
Q163	Do you accept or make payments using Virtual Currencies with clients?	
Q164	Did your entity accept or make payments using Virtual Currencies with clients within the reporting period?	
Q165	Please provide the total number of payments in virtual assets (both incoming and outgoing) with clients.	
Q166	Please provide the value of payments using cryptocurrencies (in EUR equivalent), incoming and outgoing, within the reporting period.	
Q167	Does you plan to accept payment, or offer products and services, using Virtual Currencies 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.

Q#	Question Text	Instructions
Q168	Does your entity have business relationships with Virtual Assets Platforms or Intermediaries?	
Q169	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 Purchase and resale of real estate		
Over the past five years		
Q170	Did your entity purchase and resell real estate over the past five years?	
Q171	How many real estate purchases took place over the past five years?	
Q172	Please indicate the purchase value of the real estate (in EUR) over the past five years?	
Q173	How many real estate resales took place over the past five years?	
Q174	Please indicate the resale value of the real estate (in EUR) over the past five years.	
During the reporting period		
Q175	Did your entity purchase and resell real estate during the reporting period?	
Q176	How many real estate purchases took place during the reporting period?	
Q177	Please indicate the purchase value of the real estate (in EUR) within the reporting period.	
For questions concerning the financing method used, if your acquisition was made through a combination of several means (for example: partly with equity and partly through a bank loan), each financing method should be recorded separately.		
Q178	Have you financed real estate acquisitions through equity capital?	
Q179	How many real estate acquisitions were financed through equity capital?	
Q180	Have you financed real estate acquisitions through bank loans?	
Q181	How many real estate acquisitions were financed through bank loans?	
Q182	Have you financed real estate acquisitions through third-party investors?	
Q183	How many real estate acquisitions were financed through third-party investors?	
Q184	Have you financed real estate acquisitions by any other means?	
Q185	How many real estate acquisitions were financed by any other means?	
Q186	How many real estate resales took place during the reporting period?	
Q187	Please indicate the resale value of the real estate (in EUR) within the reporting period.	
Q188	What is the total amount of capital gains generated by the sale of real estate during the reporting period?	

Q#	Question Text	Instructions
Q189	Did your entity carry out any renovations/transformations on real estate during the reporting period?	
Q190	How many properties do you currently own that are undergoing renovation/transformation?	
Q191	Please indicate the value of renovations and transformations to real estate (in EUR) occurred within the reporting period.	
Q192	Have any of the properties currently undergoing renovation been owned for more than three years?	
Q193	How many real estate undergoing renovation have been owned for more than three years?	
Q194	Were any sales made preemptive to the State of Monaco?	
Q195	How many properties were purchased by the State of Monaco preemptive?	
Q196	What was the total value of property purchased by the State of Monaco preemptive?	
2.8 Purchase and resale of business assets		
Over the past five years		
Q197	Did your entity purchase and resell of business assets over the past five year ?	
Q198	How many purchases of business assets took place over the past five years?	
Q199	Please indicate the purchase value of the business assets (in EUR) over the past five years.	
Q200	How many resales of business assets took place over the past five years?	
Q201	Please indicate the resale value of these properties (in EUR) over the past five years.	
During the reporting period		
Q202	Did your entity purchase and resell of business assets during the reporting period?	
Q203	How many purchases of business assets took place during the reporting period?	
Q204	Please indicate the purchase value of the business assets (in EUR) within the reporting period.	
For questions concerning the financing method used, if your acquisition was made through a combination of several means (for example: partly with equity and partly through a bank loan), each financing method should be recorded separately.		
Q205	Have you financed business assets acquisitions through equity capital?	
Q206	How many business assets acquisitions were financed through equity capital?	
Q207	Have you financed business assets acquisitions through bank loans?	
Q208	How many business assets acquisitions were financed through bank loans?	
Q209	Have you financed business assets acquisitions through third-party investors?	

Q#	Question Text	Instructions
Q210	How many business assets acquisitions were financed through third-party investors?	
Q211	Have you financed business assets acquisitions by any other means?	
Q212	How many business assets acquisitions were financed by any other means?	
Q213	How many resales of business assets took place during the reporting period?	
Q214	Please indicate the resale value of these properties (in EUR) within the reporting period.	
Q215	What is the total amount of capital gains generated by the sale of business asset during the reporting period?	
Q216	Did your entity carry out any renovations/transformations on business assets during the reporting period?	
Q217	How many business assets do you currently own that are undergoing renovation/transformation?	
Q218	Please indicate the value of renovations and transformations to business assets (in EUR) occurred within the reporting period.	
Q219	Have any of the business assets currently undergoing renovation been owned for more than three years?	
Q220	How many business assets undergoing renovation have been owned for more than three years?	
Q221	Were any sales made preemptive to the State of Monaco?	
Q222	How many properties were purchased by the State of Monaco preemptive?	
Q223	What was the total value of property purchased by the State of Monaco preemptive?	
2.9 Purchase and resale of shares or stock in civil companies		
Over the past five years		
Q224	Did your entity purchase and resell of shares or stock in civil companies over the past five year ?	
Q225	How many purchases of shares and stock in civil companies took place over the past five years ?	
Q226	Please indicate the purchase value of shares and stock in civil companies (in EUR) over the past five years.	
Q227	How many resales of shares and stock in civil companies took place over the past five years?	
Q228	Please indicate the resale value of shares and stock in civil companies (in EUR) over the past five years.	
During the reporting period		
Q229	Did your entity purchase and resell of shares or stock in civil companies during the reporting period?	
Q230	How many purchases of shares and stock in civil companies took place during the reporting period?	
Q231	Please indicate the purchase value of shares and stock in civil companies (in EUR) within the reporting period.	

Q#	Question Text	Instructions
For questions concerning the financing method used, if your acquisition was made through a combination of several means (for example: partly with equity and partly through a bank loan), each financing method should be recorded separately.		
Q232	Have you financed shares or stock in civil companies acquisitions through equity capital?	
Q233	How many shares or stock in civil companies acquisitions were financed through equity capital?	
Q234	Have you financed shares or stock in civil companies acquisitions through bank loans?	
Q235	How many shares or stock in civil companies acquisitions were financed through bank loans?	
Q236	Have you financed shares or stock in civil companies acquisitions through third-party investors?	
Q237	How many shares or stock in civil companies acquisitions were financed through third-party investors?	
Q238	Have you financed shares or stock in civil companies acquisitions by any other means?	
Q239	How many shares or stock in civil companies acquisitions were financed by any other means?	
Q240	How many resales of shares and stock in civil companies took place during the reporting period?	
Q241	Please indicate the resale value of shares and stock in civil companies (in EUR) within the reporting period.	
Q242	What is the total amount of capital gains generated by the sale of shares and stock in civil companies during the reporting period?	
Q243	Did your entity carry out any renovations/transformations on shares and stock in civil companies during the reporting period?	
Q244	How many shares and stock in civil companies do you currently own that are undergoing renovation/transformation?	
Q245	Please indicate the value of renovations and transformations to business assets (in EUR) occurred within the reporting period.	
Q246	Have any of the shares and stock in civil companies currently undergoing renovation been owned for more than three years?	
Q247	How many shares and stock in civil companies undergoing renovation have been owned for more than three years?	
Q248	Were any sales made preemptive to the State of Monaco?	
Q249	How many properties were purchased by the State of Monaco preemptive?	
Q250	What was the total value of property purchased by the State of Monaco preemptive?	
2.10 Collaboration		

Q#	Question Text	Instructions
Q251	Does your organization work in collaboration with other confreres?	
Q252	Have you collaborated with other colleagues to purchase of real estate in co-ownership?	
Q253	Have you collaborated with other colleagues to finance an acquisition?	
Q254	Have you collaborated with other colleagues for a reason not mentioned above?	
Q255	Please specify the reason for your collaboration.	
2.11 Comments & Feedback		
Q256	Do you have feedback related to any questions in this section?	
Q257	Please provide comments or feedback on this section here.	
3 Distribution Risk		
3.1 Identification		
Q258	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.
Q259	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.	
Q260	Does your entity rely on Foreign Third Parties to undertake some/all CDD measures towards clients?	
Q261	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.
Q262	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		
Q263	Did your entity onboard clients within the reporting period?	
Q264	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.

Q#	Question Text	Instructions
Q265	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.
Q266	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.
Q267	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.
Q268	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.
Q269	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.
Q270	Please provide the number of new unique clients, that are Legal Persons, that have been onboarded Non-face-to-face for CDD purposes.	If the entity accepts new business relationships without a physical meeting, the number of new unique legal person clients should be indicated here.
Q271	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.
Q272	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.
Q273	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.
Q274	Does the entity record information on the nationality of clients approached by the business introducer?	
Q275	Can the entity provide introducers residency information?	
Q276	Please provide the total number of clients onboarded that were Introduced through Third Parties, within the	Reporting Period.

Q#	Question Text	Instructions
	reporting period, broken down by primary nationality of the client (if Natural Person) or by country of establishment (if Legal Person or Legal Arrangement).	
Q277	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.
Q278	*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.**
Q279	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.
Q280	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.
Q281	*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		
Q282	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
Q283	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.
Q284	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)	
Q285	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.	

Q#	Question Text	Instructions
Q286	Does your entity have any Branches, Subsidiaries, or Agencies?	
Q287	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".
Q288	Is your entity a Branch or Subsidiary of another Entity?	
Q289	Is your entity a Branch or Subsidiary of a Foreign Entity?	
Q290	If a Foreign Entity Branch or Subsidiary, in which country is the parent undertaking?	
Q291	Please provide the total number of foreign branches and subsidiaries (i.e. outside Monaco).	
Q292	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?
Q293	Please indicate the development or modification.	
Q294	Is your entity part of an international business network or group?	
Q295	If so, please specify.	
Q296	Is your entity a member of a professional association or society?	
Q297	If so, please specify.	
3.4 Entity Finances		
Q298	Turnover for the reporting period.	
Q299	Turnover for the reporting period realized in the Principality of Monaco.	
Q300	Turnover for the reporting period realized outside the Principality of Monaco.	
Q301	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		
Q302	Did you reject any prospects due to concerns about ML/TF/PF during the reporting period?	
Q303	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.	
Q304	Can your entity distinguish whether a new client business relationship was rejected due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice?	

Q#	Question Text	Instructions
Q305	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, due to client attributes / activities / deficiencies.	
3.6 Terminated Relationships		
Q306	Have you terminated any business relationships with clients due to concerns about ML/TF/PF during the reporting period?	
Q307	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period.	
Q308	Can your entity distinguish whether client relationship was terminated due to a client attribute / activity / deficiency or the entity's discretionary AML/CFT/CPF practice?	
Q309	Please provide the total number of client business relationships that have been terminated due to ML/TF/PF considerations during the reporting period, due to client attributes / activities / deficiencies.	
3.7 Comments & Feedback		
Q310	Do you have feedback related to any questions in this section?	
Q311	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 Q283.** 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	Approximately how many hours were spent on AML/CFT/CPF per month?	
C4	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 • A small business with a single layer of management
C5	Does your entity have a compliance department?	
C6	Is your entity part of a Group?	

C#	Question Text	Instructions
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/or senior management of your entity?	The reporting entity should disclose whether its written AML/CFT/CPF policies and procedures have been formally approved by the senior management (be it the Board of Directors or any other person that executes control over the entity and/or has decision-making power).
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	Does your entity have a group-wide AML/CFT/CPF programme?	
C19	Has your entity conducted an analysis to identify whether the group AML/CFT/CPF programme complies with Monaco's legislation and regulatory framework for each branch/subsidiary?	
C20	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.
C21	Did your entity conduct a Self-Assessment of Adequacy of AML/CFT/CPF Procedures?	

C#	Question Text	Instructions
C22	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 ?	
C23	Has your entity previously submitted AML/CFT/CPF Procedures to AMSF?	
C24	Please provide the last date of transmission of your AML/CFT/CPF procedures manual to AMSF.	
1.3 Governance		
C25	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.
C26	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.
C27	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.
C28	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		
C29	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.
C30	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.
C31	Please identify the number and types of AML/CFT/CPF violations.	
1.5 Training		
C32	Did your entity conduct any AML/CFT/CPF training in the reporting period?	
C33	Did your entity conduct AML/CFT/CPF training for its Directors / Management in the reporting period?	
C34	Did your entity conduct AML/CFT/CPF training for its Office 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 persons trained on AML/CFT/CPF matters during the reporting cycle.	
C37	Are employees required to participate in AML/CFT/CPF training prior to their assignment to customer-facing or other duties of relevance for AML/CFT/CPF?	

C#	Question Text	Instructions
C38	Provide the estimated average number of hours per person spent on Initial Training.	
C39	Are employees required to undergo periodic refresher training to reinforce AML/CFT/CPF knowledge and skills?	
C40	Provide the number of staff that have received Refresher Training within the reporting period.	
C41	Provide the estimated average number of hours per person spent on Refresher Training.	
C42	Does the entity provide specialized training for employees working in high-risk areas, such as compliance and customer due diligence?	
C43	Please provide the total number of training/awareness raising activities on AML/CFT/CPF matters in Reporting Cycle.	
	1.6 CDD	
C44	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 • Level of Risk • Activity • Source of Wealth • Source of Funds	
C45	Specify which items are not collected.	
C46	When the client transaction is by an individual, does your entity record the individual's Identity Card?	
C47	When the client transaction is by an individual, does your entity record the individual's Passport?	
C48	When the client transaction is by an individual, does your entity record the individual's Residence Card?	
C49	When the client transaction is by an individual, does your entity record the individual's Proof of Address?	
C50	When the client transaction is by an individual, does your entity record any other data of the individual?	
C51	Please specify what other information is included in your database.	
C52	Does the entity's database contain all of the following, when applicable: • Name • Country of Incorporation • Foundation Date	

C#	Question Text	Instructions
	• Administrators/Directors • Beneficial Owner • Legal Representatives • Level of Risk • Representative of Company or Client	
C53	Please specify which items are not collected.	
C54	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	
C55	Please specify which items are not collected.	
C56	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's commercial register extract?	
C57	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's statutes?	
C58	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record the client's Meeting Minutes?	
C59	When the transaction is by a Legal Person/Legal Arrangement, does your entity record the client's identity documents of all effective Beneficial Owners (owning 25% or more of the entity)?	
C60	When the client transaction is by a Legal Person/Legal Arrangement, does your entity record any other data?	
C61	Please specify other data of Legal Persons / Legal Arrangements recorded.	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?

C#	Question Text	Instructions
C62	Is past 5 years of client relationship data accessible by AMSF upon request?	
C63	Are all of these documents systematically kept?	
C64	Does your entity keep summary records of all of the above data?	
C65	Does your entity keep these summary records in an electronic database?	
C66	Does your entity use tools to perform CDD?	
C67	Which tools?	
C68	Are the CDD tool's results systematically stored?	
C69	Does your entity apply a risk-based approach to customer due diligence measures (CDD)?	
C70	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.
C71	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.	**Repeat the response from Q10.**
C72	Has your entity performed Simplified Due Diligence on any clients within the reporting period?	
C73	Please provide the total number of unique clients that are subject to Simplified Due Diligence measures.	
C74	Does your entity identify and verify its clients using reliable and independent information in all cases of CDD?	
C75	Does your entity's CDD policies include procedures for client acceptance and procedures for identifying and verifying client and Beneficial Owner identity?	
C76	Does your entity rely on third parties to collect CDD information about clients?	
C77	Has your entity experienced difficulty in receiving CDD information from 3rd parties when needed?	
C78	Please provide the main reason for the difficulties (e.g. legal reason, commercial reason, unavailability of information, other) and the type of third parties (e.g. financial institution, DNFBP).	
C79	Does your entity apply enhanced identification and verification on all high-risk clients before customer take-on?	
C80	Does your entity examine the source of wealth before customer take-on?	
C81	How often is ongoing due diligence done on clients that are classified as High-Risk for ML/FT?	
C82	Does your entity undertake other measures for high-risk clients, before customer take-on?	
C83	Please specify other measures taken for high-risk clients, before customer take-on.	

C#	Question Text	Instructions
C84	Do your clients make transactions using Virtual Currencies?	
C85	How does the company verify the Beneficial Owners of Virtual Assets?	
	1.7 EDD	
C86	Did you apply enhanced due diligence measures to clients during the reporting period ?	
C87	Please provide the total number of unique clients where enhanced due diligence was applied at onboarding.	
C88	Please provide the total number of unique clients where enhanced due diligence was applied in the course of business relationships.	
C89	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.
	1.8 Risk Assessments	
C90	Does your entity apply AML/CFT/CPF risk ratings to its clients?	
C91	How many AML/CFT/CPF risk levels does your entity have for clients?	
C92	Did you have clients presenting a high risk in terms of AML/CFT during the reporting period?	
C93	Please provide the number of unique clients, that are rated as High-Risk for AML/CFT/CPF.	
C94	Do you have clients whose risk level has not yet been determined?	
C95	Please provide the total number of unique clients that are without a risk level determined yet.	
C96	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	
C97	Please specify which items are not considered.	
C98	Does your entity use a list of Sensitive Countries for AML/CFT/CPF risk assessment?	(client assessments)
C99	Does your entity use a list of Sensitive Activities for AML/CFT/CPF risk assessment?	(client assessments)
C100	What client activities does your entity associate with High-Risk clients?	
C101	Does your entity consider ML and TF risks separately?	(entity's own assessment)

C#	Question Text	Instructions
1.9 Audit / Controls		
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?	
C107	Please describe the specific controls and procedures for cash transactions your entity applies.	
1.11 Record Keeping		
C108	Does your entity keep transaction records for at least 5 years?	
C109	Does your entity keep all CDD and business correspondence for at least 5 years after the end of a client relationship?	
C110	Does your entity keep these records and documents in a safe and secure place?	
C111	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.
C112	Does your entity have backups for CDD and business correspondence information with a disaster recovery plan?	
1.12 Targeted Financial Sanctions (TFS)		
C113	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#	Question Text	Instructions
		(c) Handling of alerts, false positives (incl. how should the alerts be resolved where information is unavailable, incomplete or potentially unreliable).
C114	Does your entity check the Monaco National Asset Freezing List when onboarding new clients or when the list is updated?	
C115	Has your entity identified any person/transactions related to Terrorism Financing or Proliferation of Weapons of Mass Destruction within the reporting period.	
C116	Please provide the total number of reports made to Direction du Budget et du Trésor (DBT) related to Terrorism Financing.	
C117	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)		
C118	Does your entity take measures to determine whether clients and beneficial owners are politically exposed persons (PEPs)?	
C119	What measures does your entity apply to determine whether clients and beneficial owners are PEPs?	
C120	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.
C121	Did you enter into any relationships with PEPs during the reporting period?	
C122	Does PEP screening occur as part of the CDD process for new customers?	
C123	Provide the estimated average number of hours dedicated by AML/CFT/CPF compliance personnel to onboard a new PEP client.	
C124	Provide the estimated percentage of self-declared information matching with PEP status determinations.	
C125	Does screening for PEPs occur on an ongoing basis?	
C126	Provide the approximate average number of days for a PEP status reassessment after events (such as political office changes).	
C127	Are PEPs subject to increased monitoring?	
C128	Does your entity consider all PEP relationships as High-Risk for AML/CFT/CPF?	

C#	Question Text	Instructions
C129	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		
C130	Is your entity registered with goAML?	
C131	Please describe why	In case the above question is answered “No”.
C132	Have you identified or reported any suspicious transactions or activities to your compliance officer during the reporting period?	
C133	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.	
C134	Did your entity submit any STRs/SARs to the FIU within the reporting period?	
C135	Please provide the total number of STRs/ SARs transmitted to the CRF during the reporting period.	
C136	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).
C137	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).
C138	Please provide the total number of STRs/ SARs related to targeted financial sanctions that your entity reported to the FIU within the reporting period.	
C139	Please provide the total number of STRs/ SARs related to other reasons not mentioned above that your entity reported to the CRF during the reporting period.	
C140	Did your entity respond internally to the suspicious transactions?	
C141	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		
C142	Do you have feedback related to any questions in this section?	
C143	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.