

# Compliance Checklist

## AML/CFT Policies & Procedures

- Updated AML/CFT Policy and Procedures available and approved by Senior Management
- KYC procedures clearly defined, including UBO identification steps
- Process for identifying and managing PEPs established and documented
- Customer Risk Assessment procedures documented and applied
- Record-keeping process documented, including retention timelines
- Targeted Financial Sanctions (TFS) implementation process documented

## Compliance Officer Documentation

- Compliance Officer formally appointed (internal or outsourced)
- CV and Job Description available and updated
- Latest Compliance Officer Periodic Report available
- Employee AML/CFT training plan documented
- Training attendance records are maintained
- List of all GoAML reports submitted, maintained and accessible

## Risk Assessment

1. Entity-wide Risk Assessment Methodology documented
2. Full client list including:
  - Client risk classification
  - Nationality
  - Client type (individual, corporate, supplier, customer)
  - Geographical risk
  - Product/service risk
  - Delivery channels risk
  - Transaction value and volume
  - PEP status
  - Payment methods

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## Customer Due Diligence (CDD/EDD)

- Client list with risk ratings, nationality, and client type
- Complete CDD/EDD files available for all active clients
- Supplier list available with complete KYC files
- Sample KYC forms filled correctly and available

## Politically Exposed Persons (PEPs)

- PEP Register updated and complete
- Senior Management approvals available for onboarding PEPs
- Supporting documents included (source of wealth, enhanced due diligence steps)

## Cash Transactions & Virtual Assets

1. List of all cash transactions for past two years available
2. Virtual Asset transaction list available (if applicable), including:
  - Wallet numbers
  - Platform names
  - Crypto Asset type
  - Transaction numbers

## Ongoing & Transaction Monitoring

- Documented Ongoing Transaction Monitoring mechanism
- List of red flags used in monitoring available and aligned with
- Evidence of ongoing monitoring activity (logs, alerts, reviews)

## GoAML Reporting

- Two-year list of STR/SAR submissions
- Two-year list of suspicious activities reported (DPMSR/REAR where applicable)
- List of Funds Freezing Reports / Partial Name Match Reports

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## Record Keeping

Files showing correct retention of:

- Financial transactions
- Commercial and business records
- Cash transaction documents
- Supporting materials related to onboarding and monitoring

## Targeted Financial Sanctions (TFS)

- Samples of screening results against TFS lists
- Evidence of daily or event-driven screening
- Evidence of escalation and freezing actions (if applicable)

## Independent Review

- Latest Independent Audit report on AML/CFT effectiveness
- Follow-up action plan for remediation
- Evidence of implementation of corrective actions

## AML/CFT Training Program

- List of all employee and senior management AML/CFT training sessions conducted
- Attendance records for each session
- Training certificates where applicable
- Compliance Officer's own training and certifications list