

AML Regulated Merchants Form

For AML/CTF Regulated Entities

*To be completed by AML Compliance Officer



GENERAL INFORMATION

Institution's name

Institution's license type

Name of regulator

Principle area of business activity

Country(s) of business operation

Number of employees

Existing active client base (please provide approximate number)

Customer domicile

Country 1 % of total customer base

Country 3 % of total customer base

Country 2 % of total customer base

Country 4 % of total customer base

GENERAL AML POLICIES, PRACTICES AND PROCEDURES

Does your institution have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?

Yes No

If yes, please provide the name and contact information of a designated AML officer

Name

Title

Phone

Email address

Does your AML Compliance Program require the approval of the Board of Directors or a senior committee?

Yes No

Does your AML program and written policies and procedures comply with current AML legislation, regulation and guidelines issued by the regulatory bodies in the jurisdiction in which you operate?

Yes No

In addition to inspections by the government supervisors/regulators, does your institution have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

Yes No

Does your institution have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?

Yes No

Does the company have a written AML Program and written policies in place documenting the processes to prevent, detect and report suspicious transactions?

Yes No

Does your institution have record retention procedures that comply with applicable law?

Yes No

Are your institution's AML policies and practices being applied to all branches and subsidiaries of the institution both in the home country and in locations outside of that jurisdiction?

Yes No

RISK ASSESSMENT AND DUE DILIGENCE

Has your institution implemented processes for the identification of customers on whose behalf it maintains or operates accounts or conducts transactions?

Yes No

Does your Institution have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?

Yes No

Does your Institution complete a risk-based assessment to understand the normal and expected transactions of its customers?

Yes No

Does your Institution have a requirement to collect information regarding its customers' business activities?

Yes No

Do you perform a risk-based assessment of your customer base and their transactions?

Yes No

Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that pose a heightened risk of illicit activities?

Yes No

TRANSACTION MONITORING AND REPORTING

Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?

Yes No

Do you have an automated system in place for monitoring unusual/suspicious activity?

If yes, please provide details of the system you use. If no, please provide details as to how transaction monitoring is done.

Yes No

AML FUNCTION AND TRAINING

Number of employees devoted to AML Compliance full time (please provide details):

Does your Institution provide AML training to relevant employees that includes:

- Identification and reporting of transactions that must be reported to government authorities
- Examples of different forms of money laundering involving the Institution's products and services
- Internal policies to prevent money laundering

Yes No

Does your Institution retain records of its training sessions including attendance records and relevant training materials used?

Yes No

Does your Institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?

Yes No

Does your Institution employ third parties to carry out some of the functions of the Institution?

Yes No

If yes, does your Institution provide AML training to relevant third parties that includes:

Identification and reporting of transactions that must be reported to government authorities. Examples of different forms of money laundering involving the Institution's products and services. Internal policies to prevent money laundering

Yes No

RECENT AUDITS, REGULATORY FINDINGS/FINES AND/OR REMEDIAL ACTIONS

Date of last audit and any material findings related to AML Compliance (please provide details):

Date of last regulatory visit and any material findings related to AML Compliance (please provide details):

Any material regulatory findings/fines and remedial actions undertaken in the last 5 years (please provide details):

Name

Title

Signature

Date