

# Conducting AML checks

A checklist for compliance professionals

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## Develop and maintain a robust AML programme

- Establish a clear and comprehensive AML check policy
- Designate a dedicated compliance officer responsible for AML efforts
- Implement internal controls and procedures to detect and prevent money laundering activities
- Conduct periodic risk assessments to identify and manage AML risks

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## Conduct CDD and KYB/C procedures

- Conduct thorough customer due diligence before establishing a business relationship
- Verify the identity of customers using reliable and independent sources
- Monitor and update customer information regularly
- Implement enhanced due diligence (EDD) measures for high-risk customers or transactions

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## Suspicious activity monitoring and reporting

- Implement robust systems for monitoring and detecting suspicious activity
- Establish clear guidelines for identifying and reporting any suspicious activities
- Train employees to recognise red flags and on reporting obligations
- Maintain proper documentation of suspicious activity reports (SARs) submitted to the relevant authorities

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## Ensure staff training and awareness

- Provide regular AML training to employees to ensure they understand their obligations
- Keep employees informed about the latest AML developments and regulatory updates
- Foster a culture of compliance and encourage employees to report any concerns or suspicions

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## Comply with legal and regulatory requirements

- Stay up to date with the Money Laundering Regulations and other legislation relevant to your industry
- Comply with customer screening requirements, including politically exposed persons (PEPs) and sanctions lists
- Retain records for at least five years after the end of a business relationship or a transaction (such as a house sale) has completed

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## Conduct periodic independent audits

- Enlist an independent auditor to assess the effectiveness of your AML check process at regular intervals
- Review audit findings and implement any necessary improvements

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## Collaborate with regulatory authorities

- Cooperate with regulatory bodies and provide information promptly when requested
- Stay informed about the guidance issued by the Financial Conduct Authority (FCA) and other relevant authorities