| | | |
|---|---|---|
| **2. AML, CTF & SANCTIONS PROGRAMME** | | |
| **9** | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components: | |
| **9 a** | Appointed Officer with sufficient experience / expertise | |
| **9 b** | Cash Reporting | |
| **9 c** | CDD | |
| **9 d** | EDD | |
| **9 e** | Beneficial Ownership | |
| **9 f** | Independent Testing | |
| **9 g** | Periodic Review | |
| **9 h** | Policies and Procedures | |
| **9 i** | Risk Assessment | |
| **9 j** | Sanctions | |
| **9 k** | PEP Screening | |
| **9 l** | Adverse Information Screening | |
| **9 m** | Suspicious Activity Reporting | |
| **9 n** | Training and Education | |
| **9 o** | Transaction Monitoring | |
| **10** | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | |
| **11** | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | |
| **11a** | If Y, provide further details | |
| **3. ANTI BRIBERY & CORRUPTION** | | |
| **12** | Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption? | |
| **13** | Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures? | |
| **14** | Does the Entity provide mandatory ABC training to: | |
| **14 a** | Board and Senior Committee Management | |
| **14 b** | 1st Line of Defence | |
| **14 c** | 2nd Line of Defence | |
| **14 d** | 3rd Line of Defence | |
| **14 e** | 3rd parties to which specific compliance activities subject to ABC risk have been outsourced | |
| **14 f** | Non-employed workers as appropriate (contractors / consultants) | |

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