

## Checklist of Working Papers for Supervisory Visit

### Supervisory and Registration

1. Supervisory Overview
2. Overview of a Supervisory Visit

### Templates

1. New Client Checklist
2. Account Opening Form – Individual
3. Account Opening Form – Company
4. Sample Letter of Engagement
5. Record of Relevant Staff Training
6. Reporting Lines of Communications (If Applicable)
7. Job Descriptions of Managers, officers and beneficial owners (If Applicable)
8. MLRO Summary of Reports
9. Internal SAR template
10. MLRO Supervisory visit checklist
11. Risk assessment template

## **Guidance on Building Your Own Policies, Controls and Procedures Manual**

Your written Policies, Controls and Procedures are a record of what you actually do, not a 'might or should' suggested by bought guidance manuals, this is what your supervisor will assess you on. we are reminded of this by the following note in the guidance issued by the Joint Money Laundering Steering Group (JMLSG).

*7.36 - Procedures manuals, whether paper or intranet based, are useful in raising staff awareness and in supplementing more dedicated forms of training, but their main purpose is to provide ongoing reference and they are not generally written as training material*

You may have your own methods for doing things and collating the required information. The following is merely a suggestion, it can be amended to suit your policies. We have broken down the policy documents in to numbered parts, and each part is broken down as to the reasoning for policies and suggestions for changing the template drawn mainly from the JMLSG Guidance for each segment.

<b>Your Firms Name</b>	<b>Policy, Controls and Procedures Document for Money Laundering Regulations and Bribery Act Compliance</b>
Version: Created by: Approved by: Effective Date: Latest Review Date:	1.0 The MLRO Board of Directors/partners/sole owner June 2017 June 2017 update as necessary

<b>1 Overall purpose and background</b>
<p><b>Anti-Money Laundering</b></p> <p>Money Laundering is defined as the process criminals use to conceal, transfer or seek to retain the proceeds of crime. Under UK law it includes the possession of the proceeds of a criminal's own crime, so the term can encompass the simple retention of the proceeds of crime, as well as more complex laundering schemes.</p> <p>Money laundering takes many forms, including:</p> <ul style="list-style-type: none"> <li>• trying to turn money raised through criminal activity into 'clean' money (that is, classic money laundering);</li> <li>• handling the benefit of acquisitive crimes such as theft, fraud and tax evasion;</li> <li>• handling stolen goods;</li> <li>• being directly involved with any criminal or terrorist property, or entering into arrangements to facilitate the laundering of criminal or terrorist property; and</li> <li>• criminals investing the proceeds of their crimes in the whole range of financial products.</li> </ul> <p>There are three broad groups of offences related to money laundering that as a firm we need to avoid committing. These are:</p> <ul style="list-style-type: none"> <li>• knowingly assisting (in a number of specified ways) in concealing, or entering into arrangements for the acquisition, use, and/or possession of, criminal property;</li> <li>• failing to report knowledge, suspicion, or where there are reasonable grounds for knowing or suspecting, that another person is engaged in money laundering; and</li> <li>• tipping off, or prejudicing an investigation.</li> </ul> <p><b>Scope of this document</b></p> <p>This document out what is expected of the <b>firm and our staff</b> in relation to the prevention of money laundering and terrorist financing, as to how we apply the requirements of the UK AML/CTF regime in the circumstances of the firm, and its products, services, transactions and customers. It may be made available to our supervisory body upon request.</p>

This document relates solely to how our firm should fulfil our obligations under the AML/CTF law and regulations. It is also important that our customers understand that production of the required evidence of identity does not automatically qualify them for access to the products or services they may be seeking for our firm to supply; we need to bring to bear other, commercial considerations in deciding whether particular customers should be taken on.