

NBFI AML Questionnaire

Customer's Legal Name: ("the Company")	
Registered Address:	

Questionnaire completed by:

First Name:

Last Name:

Job Role at the institution detailed above:

Contact Details:
Postal Address:

.....

Signature:

Date:

Email:

Telephone: Fax:

Anti-Money Laundering Questionnaire		
General AML Policies, Practices and Procedures		
Does the Company:		Yes/No
1.	Conduct due diligence to identify clients, and on a risk basis, to verify their identity?	
2.	Conduct a review of clients' Source of Wealth and Source of Funds?	
3.	Collect information regarding clients' business activities?	
4.	Conduct a risk-based assessment to understand the normal and expected transactions of clients?	
5.	Have AML procedures that support the prevention, detection and reporting of suspicious activity?	
6.	Operate Client Transaction Screening against lists of sanctioned persons, entities or countries issued by applicable government/competent authorities and for PEPs, initially at onboarding and subsequently regularly throughout a continuing relationship?	
7.	Operate a Transaction Monitoring program which identifies unusual and potentially suspicious activity?	
8.	Provide AML training to relevant employees?	

Controls in Respect to the Customer's High Risk Clients		
Does the Company:		Yes/No
9.	Have an AML policy that covers relationships with Politically Exposed Persons (PEPs), their family and close associates?	
10.	Maintain and implement EDD procedures for those categories of clients and transactions which pose a heightened risk of illicit activities at or through the Customer?	
Executive Accountability		
Does the Company:		Yes/No
11.	Ensure that their AML compliance program has been approved by the board or at a senior committee level?	
12.	Have a designated officer who is responsible for the Company's AML programme?	
Client Money and Assets		
Does the Company:		Yes/No
13.	Operate controls governing the receipt and use of client money and assets, where they are held?	
Group Enforcement		
Where the Company is part of a group (containing one or more greater than 50% owned subsidiaries) or where the responses to this questionnaire are informed by a party other than the Company, confirm that:		Yes/No
14.	Anti-money laundering policy, procedures and controls are communicated and enforced effectively in the Company's network of domestic and if applicable, international offices and intermediaries.	
Please provide details in regards to how this is maintained.		

If "No" answer has been provided to any of the questions above, please provide further details.

If you would like to provide any further information that has not been covered above, please do so here: