APLYiD™

AML/CTF Program Setup Checklist

Risk assessment

- ☐ Services reviewed
- ☐ Customers and delivery channels assessed
- ☐ Risk appetite documented
- ☐ Countries risk-rated (if relevant)

Notes

Personnel roles

- ☐ Compliance Officer appointed
- ☐ Senior manager identified
- ☐ Roles recorded
- ☐ Personnel due diligence complete

Client onboarding

- ☐ CDD forms ready
- ☐ Risk-rating process defined
- ☐ Enhanced due diligence triggers set
- ☐ Escalation process documented

AML/CTF Program Setup Checklist

Policies and processes

☐ AML/CTF policy drafted

☐ Procedures written down

☐ Record-keeping plan confirmed

Senior manager approval

☐ Program reviewed

☐ Approval recorded

☐ Implementation authorised

Checklist completed by:

Checklist completed on: