



## **KEY REFERENCES IN THE AML/CFT MANUAL**

### **1. KEY DEFINITIONS**

### **2. LAW ON THE PREVENTION AND SUPPRESSION OF ML & TF**

- Offences
- Sanctions
- Monitoring of Recommendations/ Guidelines of International Bodies (FATF, MONEYVAL, EU, UN etc.)

### **3. DUTIES AND RESPONSIBILITIES**

- Responsibilities of the Board of Directors and Senior Management
- Duties and Responsibilities of the Compliance Officer/Assistant(s)
  - a) Annual Report
  - b) Periodic reviews of the Company's policies, procedures, systems and controls

### **4. POLICIES**

- Anti-Money Laundering Policy
- Customer Acceptance Policy

### **5. RISK BASED APPROACH (RBA)**

- Evaluation and Assessment of risks
- Risk criteria
- Customer's categories
- Implementation of measures and procedures based on a RBA
- Monitoring and improvement of measures and procedures



## 6. KYC AND DUE DILIGENCE MEASURES

- Know your customer: When?
- Know Your Client procedures for Natural and Legal Persons
- Economic Profile
- Timing of identification and verification
- Maintaining customer identification documentation accurate and up to date
- Simplified Due Diligence and Enhanced due diligence measures
- On-going due diligence
- Monitoring of transactions and accounts
- 3<sup>rd</sup> party Reliance

## 7. RECORD KEEPING

- Record keeping: documents and duration
- Format
- Certification and language requirements
- 3<sup>rd</sup> party reliance: documentation
- Transaction records

## 8. EDUCATION AND TRAINING

- Training of the Compliance Officer
- Training of employees
- Training of the Board of Directors and Senior Management
- Annual training program
- Training Records



## 9. REPORTING

- Internal reporting procedures
- (Electronic) Reporting to MOKAS