



AML (Anti-Money Laundering) Compliance Checklist

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Client Identification & Verification (CIP)

Ensuring accurate and thorough identification and verification of all clients and beneficial owners.

Client Full Legal Name

Write something...

Date of Birth (YYYY-MM-DD)


Enter a number...



Type of Identification Document

- Passport
- Driver's License
- National ID Card
- Other

Upload Copy of Identification Document

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Identification Document Number

Write something...

Date of Identification Document Expiry (YYYY-MM-DD)

Enter date...

Residential Address Verification (utility bill, bank statement, etc. - describe verification method)

Write something...

Client Type

- Individual
- Company
- Trust
- Other

Transaction Monitoring & Reporting

Establishing procedures to monitor transactions for suspicious activity and reporting them to the relevant authorities.

Transaction Amount Threshold for Review

Enter a number...

Red Flags Observed (Select all that apply)

- Unusual Transaction Patterns
- Inconsistent Information
- Complex Ownership Structure
- Cash-Intensive Transactions
- Geographic Risk
- Lack of Apparent Business Purpose

Description of Suspicious Activity

Write something...

Date of Suspicious Transaction

Transaction Type

- Purchase
- Sale
- Rental
- Refinancing
- Other

Number of Related Transactions within a defined period

Supporting Documentation (e.g., bank statements, contracts)

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Politically Exposed Persons (PEP) Screening

Identifying and verifying Politically Exposed Persons (PEPs) and their connections.

PEP Status Determination

- Clearly Not a PEP
- Potentially a PEP - Further Investigation Required
- Confirmed PEP

Reason for PEP Determination

Write something...

PEP's Name (if applicable)

Write something...

PEP's Position (if applicable)

Write something...

Date PEP Status Determined

Enter date...

Enhanced Due Diligence (EDD) Actions Taken

Write something...

Level of Enhanced Due Diligence Applied

- Standard EDD
- Moderate EDD
- High EDD

Supporting Documentation (e.g., news articles, official publications)

 Upload File

Name of Person Responsible for PEP Determination

Write something...

Record Keeping & Documentation

Maintaining comprehensive and accurate records for all AML-related activities.

Client Onboarding Date

Enter date...

Client Identification Documentation Review Notes

Write something...

Copies of Client Identification Documents (Passport, Driver's License, etc.)

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Summary of Beneficial Ownership Information

Write something...

Supporting Documents for Beneficial Ownership Verification

 Upload File

Transaction Reference Number

Enter a number...

Suspicious Activity Report (SAR) Filing Notes (If Applicable)

Write something...

Date of Last Review of Client File

Enter date...

File Retention Status

- Active
- Archived
- Destroyed (with justification)

Training & Awareness

Providing regular AML training to employees and ensuring ongoing awareness of risks and responsibilities.

AML Training Modules Completed (Select all that apply)

- Client Identification & Verification
- Transaction Monitoring
- PEP Identification
- Sanctions Screening
- Real Estate Specific Risks
- Record Keeping Requirements

Date of Last AML Training

Enter date...

Frequency of Refresher Training (Months)

Enter a number...

Summary of Training Content Delivered

Write something...

Training Delivery Method

- Online Module
- In-Person Workshop
- Combination of Both

Employee Name (Training Record)

Write something...

Assessment Score (Post-Training)

- Excellent
- Satisfactory
- Needs Improvement

Proof of Training Completion (Certificate/Record)

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Risk Assessment & Mitigation

Conducting a comprehensive AML risk assessment and implementing controls to mitigate identified risks.

Describe the methodology used for the AML Risk Assessment.

Write something...

Frequency (in months) of Risk Assessment Review.

Enter a number...

Risk Level Designation (High, Medium, Low)

- High
- Medium
- Low

Identify key AML risks specific to your real estate business (select all that apply).

- Shell Company Usage
- Cash Transactions
- Offshore Transactions
- Property Flipping
- Complex Ownership Structures
- Third-Party Payments

Describe mitigation strategies implemented for each identified risk.

Write something...

Upload a copy of the documented Risk Assessment.

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Date of last Risk Assessment Review

Enter date...

Sanctions Screening

Screening clients and transactions against sanctions lists to ensure compliance with relevant regulations.

Sanctions Screening Method

- Automated Screening Software
- Manual Screening (against a list)

Client Name (for Screening)

Write something...

Client Address (for Screening)

Write something...

Client Identification Number (e.g., TIN, Passport Number)

Enter a number...

Date of Screening

Enter date...

Screening Results & Notes (e.g., matches found, discrepancies, investigation steps)

Write something...

Screening Outcome

- No Match
- Potential Match - Requires Further Investigation
- Confirmed Match - Transaction Blocked
- Confirmed Match - Transaction Permitted (with enhanced due diligence)

Supporting Documentation (e.g., screenshot of screening software results)

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Due Diligence on Third Parties

Implementing procedures for due diligence on agents, brokers, and other third-party intermediaries.

Third Party Type

- Agent
- Broker
- Property Manager
- Legal Counsel
- Other (Specify)


Third Party Name

Write something...

Description of Services Provided

Write something...

Copy of Third Party Identification Documents (e.g., Passport, Driver's License)

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Beneficial Ownership Verification (if applicable)

- Verified - Beneficial Owner(s) Identified
- Not Applicable - No Beneficial Owners
- Verification Pending

Notes on Due Diligence Performed (e.g., background checks, sanctions screening)

Write something...

Due Diligence Completion Date

Enter date...

Sanctions Screening Performed?

- Yes
- No

If Sanctions Screening Performed, Sanctions Screening ID

Write something...

Real Estate Specific Risks

Addressing AML risks unique to real estate transactions, such as layering, shell companies, and property flipping.

Is a Risk Assessment conducted specifically for Real Estate transactions?

Yes

No

N/A

Describe processes for identifying and mitigating risks associated with shell companies utilized in property transactions.

Write something...

Maximum acceptable value of cash transactions (threshold definition and justification)

Enter a number...

Which common layering techniques are addressed in training materials?

- Multiple Property Purchases
- Rapid Property Flipping
- Use of Multiple Legal Entities
- Complex Mortgage Structures
- Offshore Accounts Involved

Describe procedures for verifying the source of funds for large cash deposits used for property purchases.

Write something...

Are valuations independently reviewed before property transactions?

- Yes
- No
- N/A

Date of last review of Real Estate specific risk assessment

Enter date...

Compliance Program Review & Updates

Regularly reviewing and updating the AML compliance program to reflect changes in regulations and emerging risks.

Last Program Review Date

Enter date...

Summary of Review Findings

Write something...

Areas of Program Updated (Select all that apply)

- Client Identification Procedures
- Transaction Monitoring Rules
- Risk Assessment Methodology
- Employee Training Materials
- Internal Policies & Procedures
- Reporting Thresholds
- Sanctions Screening Processes

Frequency of Program Reviews (e.g., Annually, Bi-Annually)

Enter a number...

Rationale for Changes Made (Explain why changes were implemented)

Write something...

Updated Risk Assessment Document

 Upload File

Next Review Trigger (What event will prompt the next review?)

- Anniversary Date
- Regulatory Change
- Significant Change in Business Activity
- Internal Audit Findings

Date of Next Scheduled Review

Enter date...