



# AML (Anti-Money Laundering) Compliance Checklist

## 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**

 Upload File

### 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

Enter date...


### Transaction Type

- Purchase
- Sale
- Rental
- Refinancing
- Other

### Number of Related Transactions within a defined period

Enter a number...

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

 Upload File

## 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.)**

 Upload File

**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.**

 Upload File

### 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)

 Upload File

## 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)

 Upload File

### 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

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**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...