



INTERNATIONAL FINANCIAL SERVICES COMMISSION

2nd Floor, Sir Edney Cain Building, Belmopan, Belize

SUPERVISORY AUTHORITY under the MLTPA

AML/CFT QUESTIONNAIRE FOR REGISTERED AGENTS AND LICENSEES

I. Basic information on entity:

Name & Address of Registered Agent:

Name & Address of Licensee:

Type of Licence:

<i>II. General AML/CFT Policies, Practices and Procedures</i>	<i>YES</i>	<i>NO</i>
1. Is the AML compliance program approved by the entity's Board of Directors or a committee of the Board of Directors? If no, please state who approves the AML compliance program.		
2. Does the entity have a legal and regulatory compliance program that includes a designated compliance officer that is responsible for coordinating and overseeing the AML framework? If yes, please indicate the name of the Compliance Officer.		
3. If the response to question 2 is yes, is the Compliance Officer at the management level in the entity?		

<p>4. If the response to question 3 is yes, please indicate if the Compliance Officer reports directly to, the Board of Directors, a committee of the Board of Directors, or an officer of your entity.</p>		
<p>II. General AML/CFT Policies, Practices and Procedures (Cont'd)</p>	<p>YES</p>	<p>NO</p>
<p>5. Has the entity developed written policies documenting the processes that it has in place to prevent, detect and report suspicious transactions?</p>		
<p>6. In addition to inspections by the IFSC, does the entity have an internal audit function or other independent third party that assesses AML/CFT policies and practices on a regular basis? If yes, please indicate the party that undertakes such a review and the date the last review was conducted.</p>		
<p>7. If the response to question 6 is yes, does the internal audit function systematically verify that the AML/CFT procedures are being applied when it conducts inspections of the representative offices, subsidiaries, branches of your entity?</p>		
<p>8. Does the entity have a policy prohibiting accounts/relationships with shell banks? <i>(A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)</i></p>		
<p>9. Does the entity have policies to reasonably ensure that it will not conduct transactions with or on behalf of shell banks through any of its accounts or products?</p>		
<p>10. Does the entity have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?</p>		
<p>11. Does the entity have records retention procedures that comply with applicable law?</p>		
<p>12. Is the entity's AML/CFT policy, procedures and practices being applied to all representative offices, branches and subsidiaries of the entity both in the home country and in locations outside of that jurisdiction, where applicable?</p>		
<p>13. Does the entity's written rules prohibit employees from disclosing to another person the fact that an investigation has been, is being or is about to be conducted, whereby the investigation is likely to be prejudiced?</p>		

14. If the entity belongs to a group and if your written internal procedures have been drafted on the basis of a model prepared for the group as a whole, have the AML/CFT procedures been adapted to the nature of your entity's business?		
15. Does your entity periodically review its AML/CFT Policies and Procedures to determine its effectiveness?		
II. General AML/CFT Policies, Practices and Procedures (Cont'd)	YES	NO
16. If the response to 15 is yes, please indicate the date of the last review, who conducted the review and how often such a review is conducted.		
17. Does your entity have screening procedures in place to promote the hiring of employees with high ethical standards?		
18. Are you an agent of any other organization e.g. money transfer services, travelers' checks, money orders etc. If yes, please indicate the names of the organization.		
19. Does your entity own any other entities that are subject to the MLTPA? If yes, please indicate the names and addresses of those entities.		
20. Is your entity engaged in any other activities that are subject to the MLTPA? If yes, please specify the nature of these activities.		
III. Risk Assessment	YES	NO
21. Does the entity have a risk-based assessment of its customer base and their transactions to understand the normal and expected transactions of its customers?		
22. Does the entity determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the entity has reason to believe pose a heightened risk of illicit activities at or through the entity?		
IV. Know Your Customer, Due Dillgence and Enhanced Due Dillgence	YES	NO
23. Has the entity implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		

24. Does the entity have a requirement to collect information regarding its customers' business activities?		
25. Does the entity assess its clients' AML/CFT policies or practices?		
26. Does the entity have a process to review and, where appropriate, update customer information relating to high risk client information? If yes, please indicate how often such a review is undertaken.		
<i>IV. Know Your Customer, Due Dillgence and Enhanced Due Dillgence (Cont'd)</i>	<i>YES</i>	<i>NO</i>
27. Does the entity have procedures to establish a record for each new client noting their respective identification documents and 'Know Your Customer' information?		
28. Has your entity adopted procedures for customer profile analysis so it can detect unusual financial flows?		
29. Does your entity have procedures to be followed if a customer does not appear to be acting on its own behalf when it approaches your entity with a request for a service or execute a transaction?		
<i>V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</i>	<i>YES</i>	<i>NO</i>
30. Does the entity have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
31. Does the entity have procedures to identify transactions that are structured to avoid scrutiny?		
32. Does the entity screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		
33. Does the entity have policies to reasonably ensure that it only operates accounts with banks that possess licenses to operate in their countries of origin?		
<i>VI. Transaction Monitoring</i>	<i>YES</i>	<i>NO</i>
34. Does the entity have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers' checks, money orders, etc.?		
35. If the response to question 34 is yes, were the STRs filed within three days of when the suspicion was formed?		

<p>36. Did your entity carry out any internal inspection of your AML/CFT system over the past year? If yes, please indicate the date of the last inspection.</p>		
<p>37. To your knowledge, has your entity conducted financial transactions within the last 12 months that either originated from or were destined for individuals or entities based in any country being sanctioned by an international agency such as FATF (such as Non-Cooperative Countries and Territories list)? If yes, please indicate the countries involved and approximately how many transactions were conducted in each country?</p>		
<p><i>VII. AML/CFT Training</i></p>	<p><i>YES</i></p>	<p><i>NO</i></p>
<p>38. Does the entity provide AML/CFT training to relevant employees that includes:</p> <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the entity's products and services. • Internal policies to prevent money laundering. <p>If yes, please indicate:</p> <ol style="list-style-type: none"> a) Frequency: b) Mode of training: c) Who receives the training: d) Type of material: 		
<p>39. Does the entity retain records of its training sessions including attendance records and relevant training materials used?</p>		
<p>40. Are all new staff members provided with training on the prevention of money laundering and terrorist financing when they are recruited or in the weeks following their recruitment?</p>		

<i>VII. AML/CFT Training (Cont'd)</i>	<i>YES</i>	<i>NO</i>
41. Does the entity communicate new AML/CFT related laws or changes to existing AML/CFT related policies or practices to relevant employees?		
42. Does the entity employ third parties to carry out some of the functions of the entity? If yes, what functions?		
<p>43. If the answer to question 42 is yes, does the entity provide AML/CFT training to relevant third parties that includes:</p> <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the entity's products and services. • Internal policies to prevent money laundering. 		
44. Has the entity arranged for the appropriate training of employees over the last financial year? If yes, please indicate the number of employees that were trained?		

Space for additional information:
(Please indicate which question the information is referring to.)

Name:
Job title of signatory:
Signature:
Date questionnaire was completed: