**Anti-Money Laundering & Combatting the Financing of Terrorism (AML/CFT)**

**Policies and Procedures for <Business Name>**

*[This is a template document developed by the PSRA outlining the relevant AML/CFT policies and procedures which should be implemented by businesses providing property services. It should be reviewed and, where necessary, adapted to suit the individual needs of your business.]*

This document outlines the policies and procedures in place to prevent and protect <Business Name> against the commission of Money Laundering and/or Terrorist Financing.

**Version Control:**

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| --- | --- | --- | --- | --- |
| **Version** | **Date** | **Change** | **Name of Reviewer/Approver** | **Signature of Reviewer/Approver** |
| 1 | *01/01/2019* | *N/A* | *Name of Reviewer/Approver* | *Signature of Reviewer/Approver* |
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1. **Business Risk Assessment:**

<Business Name> has completed a full business risk assessment **(Appendix A)** in respect of the money laundering and/or terrorist financing risks posed to the business. This assessment identifies and evaluates the relevant risk factors and the associated control measure(s) in place. The risk assessment will be reviewed and updated by senior management as risks emerge/develop, or otherwise every two years (at a minimum).

1. **Completing a Client Risk Assessment:**

<Business Name> carries out an individual risk assessment on all clients. Based on the Irish National Risk Assessment for Money Laundering/Terrorist Financing, along with the business risk assessment completed by <Business Name>; it is expected that the majority of clients of the business will be relatively low risk in this regard. The following conditions would influence the business to increase the client’s risk rating from low to medium or high;

1. The client is a large company, trust or legal entity with a complex system of beneficiaries
2. The client is located abroad
3. It is unlikely that any business engagement with the client will be conducted on a face to face basis
4. The property service requested by the client is on a large scale e.g. sale of a large multi-unit development as opposed to a single residential home
5. The final sale/purchase of the property will not involve any other regulated professional (e.g. there will be no solicitor involvement)
6. The client is a Politically Exposed Person (as defined in section 4 of this document)
7. Transactions taking place involve the use of e-money instruments such as pre-paid cards
8. Any other factor which could increase the risk of the business being exposed to Money Laundering/Terrorist Financing

Where up to four of any of these conditions apply, the client risk rating will be increased to medium. Where more than 5 of any of these conditions apply, the risk will be increased to high.

Where the client is resident in any of the European Commission list of high risk third countries[[1]](#footnote-1), they will automatically be treated as “High” risk. Notwithstanding the conditions ratings set out above, where the business has any other reason to consider the client as “High” risk, they will be identified and treated as such.

Where a client has been identified as “high” risk, the business relationship will be monitored on an ongoing basis.

Due to the regulated nature of trading livestock, all clients and customers involved in transactions of this nature are considered low-medium risk. <Business Name> follows the appropriate guidance from the Property Services Regulatory Authority when providing such services.

1. **Carrying out Customer Due Diligence:**

<Business Name> carries out customer due diligence ahead of the signing of a Property Services Agreement (letter of engagement) in respect of;

1. Clients who are availing of a service in the sale, purchase or auction of property
2. Clients who are availing of a property management service
3. Clients who are availing of a letting service where the monthly rents involved are greater than or equal to €10,000

<Business Name> also carries out customer due diligence in respect of customers with whom they do not have a service agreement (e.g. a purchaser of a property paying a holding deposit to an agent), in the event that the value of a transaction or a series of linked transactions carried out by the customer is Equal to or Greater than €15,000.

**Auction of Art**

In relation to the auction of art, due diligence in respect of customers with whom Businesses do not have a service agreement should be carried out in respect of transactions of a total value of at least €10,000 (whether in one transaction or as a series of transactions that are or appear to be linked to each other).

Where there is any suspicion that a transaction may be linked to money laundering or terrorist financing activities, customer due diligence is carried out regardless of the type of service or the amounts involved.

Where a client/customer does not cooperate with the customer due diligence process and refuses/is unable to provide any of the information requested, <Business Name> will not proceed with the business relationship and/or occasional transaction(s).

The customer due diligence process involves requesting and recording the following information/documentation from the client or customer;

|  |  |
| --- | --- |
| **Client/Customer Type** | **Information/Documentation required** |
| Individual Clients**(Appendix B)** | * At least one form of official Photo ID (e.g. Passport, Full Drivers Licence). Where the individual is not present for identification, two forms of official photo ID are required.
* Non-Photo Verification/Proof of address (e.g. Revenue Commissioners Letter with PPSN, Dept. of Social Protection letter with PPSN, Utility Bill, Medical Card)
 |
| Corporate Clients**(Appendix C)** | * Memorandum and Articles of Association
* List of Directors names
* Official ID of one director and one signatory of the company
* Verification of all beneficial owners of the company
 |
| Partnerships **(Appendix D)** | * Copy of Partnership agreement
* ID for one Partner and one signatory of the Partnership
 |
| Trusts**(Appendix E)** | * Copy of Trust Deed
* Full name of Trust
* Nature and purpose of Trust
* Country of Establishment
* Names of all Trustees and name and address of any protector/settler
* ID for one Trustee and one signatory of the Trust
 |
| Customer carrying out an Occasional Transaction or a series of linked transactions with a value = or >€15,000**(Appendix F)** | * At least one form of official Photo ID. Where the customer is not present for identification, two forms of official photo ID are required.
* Non-Photo Verification/Proof of address
 |
| Customer carrying out an Occasional Transaction or a series of linked transactions with a value = or >€10,000 for Auction of Art**(Appendix G)** | * At least one form of official Photo ID. Where the customer is not present for identification, two forms of official photo ID are required.
* Non-Photo Verification/Proof of address
 |
| Clients/Customers buying or selling livestock | * The herd or flock number issued to the client/customer by the Regional Veterinary Office (this should be recorded clearly on the client/customer file)
 |

Where a client is identified as “high risk”, <Business Name> will carry out enhanced due diligence which would include any or all of the following;

* Completing a basic internet search of the individual, company, partnership etc.
* Verifying the occupation of a client (in the case of an individual)
* Where the client operates a business, verifying the nature of their business through the business website, advertising etc.
* Completing a company search using the CRO website, solocheck.ie, vision-net.ie etc.

Beneficial Owners

In order to verify the beneficial owners of a company, <Business Name> will request the company’s corporate structure/organisation chart and specify that this should include all beneficial owners i.e. all individuals who own or control the company through direct or indirect ownership of a sufficient percentage of shares/voting rights/ownership interest in that company. The Central Registers of Beneficial Ownership[[2]](#footnote-2) will be used, where necessary to supplement and/or verify the information provided by the client.

Politically Exposed Persons (PEP)

<Business Name> takes all measures necessary to determine if a client is a PEP, a family member or a close associate of a PEP (as defined below). Where a client is a PEP, <Business Name> carries out enhanced customer due diligence before signing the Property Services Agreement (letter of engagement) with the client. At a minimum; approval to establish the business relationship is obtained from senior management and the source of wealth and/or funds involved in the provision of the property service is determined.

*\*Definition of a Politically Exposed Person (PEP)*

A person who holds, or has held at any time in the last year:

1. A prominent public function including:-
* A head of state, head of Government, Government minister, deputy or assistant Government minister;
* A member of parliament or of a similar legislative body, or a member of the governing body of a political party;
* A member of the supreme court, constitutional court or other high level judicial body whose decisions, other than in exceptional circumstances, are not subject to further appeal;
* A member of a court of auditors or the board of a central bank;
* An ambassador, chargé affairs or high-ranking officer in the armed forces.
* A director, deputy director or member of the board of, or person performing

the equivalent function in relation to, an international organisation.

1. Or is a member of the administrative, management or supervisory body of a state-owned enterprise.
2. Or any individual performing a prescribed function (Guidelines due to be issued by the Minister).

A “Close Associate” is defined as;

1. Any individual who has joint beneficial ownership of a legal entity, or a legal arrangement, or close business relationship, with a PEP;
2. Any individual who has sole beneficial ownership of a legal entity, or legal arrangement set up for the actual benefit of a PEP.

An “immediate family member” of a PEP includes; a spouse/cohabitant, a parent, sibling or child of a PEP, and a spouse/cohabitant of a child of a PEP.

High Risk Third Countries

When dealing with a customer established or residing in a high risk third country, <Business Name> will apply the following additional measures;

(a) Obtain additional information on the customer and on the beneficial owner;

(b) Obtain additional information on the intended nature of the business relationship;

(c) Obtain information on the source of funds and source of wealth of the customer and of the beneficial owner;

(d) Obtain information on the reasons for the intended or performed transactions;

(e) Obtain the approval of senior management for establishing or continuing the business relationship;

(f) Conduct enhanced monitoring of the business relationship by increasing the number and timing of controls applied and selecting patterns of transaction that need further examination..

1. **Suspicious Transaction Reports (STR’s)**

During the customer due diligence process and in the conduct of business with all clients and customers, <Business Name> will be vigilant to any activity which could be related to money laundering or terrorist financing. <Business Name> examines the background and purpose of all transactions that are; complex, unusually large, conducted in unusual patterns, or do not have an apparent economic or lawful purpose. Where an unusual or suspicious transaction has occurred, <Business Name> submits an STR through both the goAML (An Garda Síochána) and Revenue Online Services - ROS (Revenue) systems. <Business Name> follows guidance from the PSRA on when to complete an STR[[3]](#footnote-3).

1. **Training**

<Business Name> ensures that all staff have received adequate and up to date AML/CFT training, and a record is kept of same **(Appendix H)**.

1. **Retention of Records**

<Business Name> retains all AML records for seven years in line with PSRA records held by the business. Personal information contained within these records will be deleted after seven years, unless the business has been instructed otherwise.

1. **Policies and Procedures**

This document will be reviewed as often as required but at a minimum every 2 years, and distributed to all staff following each review.

**Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT)**

**Business Risk Assessment**

*[This is a template Business Risk Assessment developed by the PSRA for Property Service Providers and should be adapted to suit the individual needs of your business. The text in black is standard text relevant to all businesses. Text in blue is sample text which may or may not apply to your business specifically. It should be adapted and developed appropriately.]*

**Business Name:** <Insert Business Name here>

**Version Control:**

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| --- | --- | --- | --- |
| **Date** | **Change** | **Name of Reviewer/Approver** | **Signature of Reviewer/Approver** |
| 01/01/2019 | Version 1 | *Name of Senior Manager who reviewed and approved the assessment/any changes made to it.* | *Signature of Senior Manager who reviewed and approved the assessment/any changes made to it.* |
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**Risk Assessment of the Sector (under the National Risk Assessment):**

This business operates within the property services sector. While investment in property is viewed as an attractive means to launder the proceeds of crime, this risk is mitigated as Property Service Providers do not usually handle significant sums of money and property purchase transactions (of substantial value) are generally not possible without the involvement of other professionals.

The overall ML/TF risk within the property sector is judged to be **Medium-Low** under the National Risk Assessment.

**Assessment:**

|  |  |  |
| --- | --- | --- |
| **Risk Factor** | **Overview of Risk Factor as Applied to the Business** | **Evaluation of Risk & Control Measures in Place** |
| Types of Service(s) provided by the business. | E.g.* The auction of private property other than land (Licence Type A)
* The purchase or sale, by whatever means, of any estate or interest in land (including buildings) wherever situated (Licence type B)
* The letting of any estate or interest in land wherever situated (Licence Type C)
* The provision of property management services (Licence Type D)
 | E.g.Evaluation:As a provider of services, this business must operate within the regulations of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010.Control(s):The Business will implement the appropriate policies and procedures in order to comply with Money Laundering/Terrorist Financing regulations. |
| Means by which client engagement occurs. | E.g.* Client engagement *always/most often/sometimes* involves face to face interaction (i.e. at a minimum the client presents in person for identification purposes)
* Client engagement *always/sometimes* occurs online
 | E.g.Evaluation:The business acknowledges the increased risk associated with client engagement which does not involve any face to face interaction and particularly where all engagement occurs online.Control(s):The business will consider this risk in the carrying out of customer due diligence on such clients and take extra measures where necessary. |
| Types of Client/Customer the business deals with. | E.g.The business deals with the following types of clients;* Individuals
* Companies
* Partnerships
* Trusts

These clients can be further categorised into those requiring a once off property service and those requiring ongoing services.Additionally, the business engages with purchasers/potential purchasers or tenants of property. The purchasers or tenants are not typically considered clients of the business (though certain due diligence measures may still be appropriate). Engagement with purchasers/potential purchasers is limited (for the most part) to accepting holding deposits and/or payments for property on behalf of a contracted client. The business may receive once off holding deposits from tenants in relation to a letting or they may receive rents from tenants on an ongoing basis. | E.g.Evaluation:The type of client and the nature of the business relationship with the client will be factors in determining their associated risk. The location of residence of the client may also be a factor.Control(s):Assessing the risk associated with a corporate client, partnership or trust may require enhanced effort or investigation, depending on1. The size and nature of the company
2. The business’ prior familiarity with the company/partnership/trust.

All reasonable efforts will be made to assess the risk in these instances.Where there is an ongoing, long-term business relationship with the client (as opposed to a once off service); the relationship would be monitored and the risk assessment process would be ongoing.The Business also acknowledges the money laundering/terrorist financing risks associated with purchasers/potential purchaser and tenants particularly where high value monetary transactions and cash transactions are involved.Where any client/customer is resident in a high-risk jurisdiction, they will be assessed as high risk and customer due diligence will be carried out accordingly.  |
| Countries in which the business operates | E.g.* Republic of Ireland Only
* Republic of Ireland and Northern Ireland
* Republic of Ireland and Internationally
 | E.g.Evaluation:The business recognised the increased risk of Money Laundering/Terrorist Financing, where cross border/international services are provided.Control(s):In respect of any cross border or international provision of services, increased measures will be taken to carry out client risk assessments and customer due diligence as appropriate. |
| Types of monetary transactions carried out in relation to the business | E.g.* Receipt of holding deposits/payments for property
* Transfers of holding deposits/proceeds of sale to the client
* Receipt of rents from tenants
* Receipt of fees from client
* Retention of fees from holding deposits/the proceeds of sale of property
 | E.g.Evaluation:Cash based transactions pose the highest risk in relation to money laundering and terrorist financing. Control(s):Ongoing monitoring will be carried out on monetary transactions with particular attention given to high value and cash transactions. The business has registered with GoAML and ROS, and where the business becomes aware of a transaction that is of an unusual or suspicious nature, a suspicious transaction report (STR) will be made to the Revenue and An Garda Síochána. |
| Any other Risk Factor(s) deemed relevant to the business |  |  |

**Overall Conclusion:**

Considering the risk factors identified in this assessment and the controls in place to mitigate such risks where possible, the overall risk of Money Laundering/Terrorist Financing to this business is considered **Low/Low-Medium/Medium/Medium-High/High.**

**CLIENT/CUSTOMER DUE DILIGENCE REPORT**

**In respect of a Client who is an Individual**

**Part 1: Name and details of Client**

Full name:

Home Address:

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this client is; Low Medium High

**Part 3: Details of CDD carried out in respect of the Client**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has photo ID been provided? **(Mandatory Requirement)** |  |  |
| Has official proof of address been provided? |  |  |
| Was the individual present for the identification process? |  | N/A |
| Where the individual was not present, were additional measures taken to identify the individual? (e.g. 2nd form of ID, confirmation of custom with an acceptable institution) |  |  |
| Is the individual a Politically Exposed Person (PEP)[[4]](#footnote-4), a Close Associate of a PEP or an Immediate Family member of a PEP? |  |  |
| Where the individual is a PEP, close associate or immediate family member of a PEP;* Has approval been obtained by senior management to establish a business relationship with the individual?
* Has the source of wealth or funds been determined?
 |  |  |
|  | Name & Signature of Approver: |
|  |  |
| Where the client has been given a risk rating of High, has enhanced due diligence[[5]](#footnote-5) been completed? |  |  |

**Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient customer due diligence has been carried out in respect of this individual and with regard to their associated risk.

Signed: Date:

**CLIENT/CUSTOMER DUE DILIGENCE REPORT**

**In respect of a Corporate Client (Including Receivers) & (Corporate Investment Schemes)**

**Part 1: Details of Client**

Company/Body Corporate name:

Business/Company address:

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this client is; Low Medium High

**Part 3: Details of CDD carried out in respect of the Client**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has the company’s Memorandum and Articles of Association been provided? \*In the case of a Receiver, has the Deed of Appointment been provided? \*In the case of an Investment Scheme, has verification through the CRO registerbeen obtained? **(Mandatory Requirement)** |  |  |
| Has the list of company directors been provided? **(Mandatory Requirement)** |  |  |
| Has proof of identity for one company directory been provided? **(Mandatory Requirement)** |  |  |
| Has proof of identity for one signatory on the company’s bank account been provided? **(Mandatory Requirement)** |  |  |
| Have all beneficial owners of the company been identified? **(Mandatory Requirement)** |  |  |
| Are any of the company directors Politically Exposed Persons (PEP), Close Associates of any PEP or an Immediate Family members of any PEP? |  |  |
| Where a company director is a PEP, close associate or immediate family member of a PEP;* Has approval been obtained by senior management to establish a business relationship with the individual?
* Has the source of wealth or funds been determined?
 |  |  |
|  | Name & Signature of Approver: |
|  |  |
| Where the client has been given a risk rating of High, has enhanced due diligence been completed? |  |  |

**Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient customer due diligence has been carried out in respect of this Corporate Client.

Signed: Date:

**CLIENT/CUSTOMER DUE DILIGENCE REPORT**

**In respect of a Partnership**

**Part 1: Details of Client**

Name and Address of Partner 1:

Name and Address of Partner 2:

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this client is; Low Medium High

**Part3: Details of CDD carried out in respect of the Client**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has a copy of the partnership agreement been provided? **(Mandatory Requirement)** |  |  |
| Has proof of identity for (at least) one partner been provided? **(Mandatory Requirement)** \*In the case of a Limited Partnership, ID from one general and one limited partner should be obtained. |  |  |
| Has proof of identity for (at least) one signatory of the partnership been provided? **(Mandatory Requirement)** |  |  |
| Have all beneficial owners of the partnership been identified? **(Mandatory Requirement)** |  |  |
| Are either of the partners Politically Exposed Persons (PEP), Close Associates of any PEP or an Immediate Family members of any PEP? |  |  |
| Where a company director is a PEP, close associate or immediate family member of a PEP;* Has approval been obtained by senior management to establish a business relationship with the individual?
* Has the source of wealth or funds been determined?
 |  |  |
|  | Name & Signature of Approver: |
|  |  |
| Where the client has been given a risk rating of High, has enhanced due diligence been completed? |  |  |

**Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient customer due diligence has been carried out in respect of this Partnership.

Signed: Date:

**CLIENT/CUSTOMER DUE DILIGENCE REPORT**

**In respect of a Trust**

**Part 1: Details of Client/Trust**

Full name of Trust:

Nature and Purpose of Trust:

Country of Establishment

Name and address of

Protector/Settler (if applicable);

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this client is; Low Medium High

**Part 3: Details of CDD carried out in respect of the Trust**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has a copy of the Trust Deed been provided? **(Mandatory Requirement)** |  |  |
| Have the names of all Trustees been provided? **(Mandatory Requirement)** |  |  |
| Has proof of identity of (at least) one Trustee been provided? **(Mandatory Requirement)** |  |  |
| Have all beneficial owners in respect of the Trust been identified? **(Mandatory Requirement)** |  |  |
| Where the client has been given a risk rating of High, has enhanced due diligence been completed? |  |  |

**Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient customer due diligence has been carried out in respect of this Trust and with regard to their associated risk.

Signed: Date:

**CUSTOMER DUE DILIGENCE**

**for an OCCASIONAL TRANSACTION**

**(or series of transactions) Equal to/Greater than €15,000**

**Part 1: Name and details of person carrying out the transaction**

Full name:

Home address:

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this customer is; Low Medium High

**Part 3: Customer Due Diligence (CDD)**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has photo ID been provided?  |  |  |
| Has official proof of address been provided? |  |  |
| Was the customer present when identified? |  | N/A |
| Where the customer was not present, were additional measures taken to identify the individual? (e.g. 2nd form of ID, confirmation of custom with an acceptable institution) |  |  |
| Is the customer a Politically Exposed Person (PEP), a Close Associate of a PEP or an Immediate Family member of a PEP? |  |  |
| Where the individual is a PEP, close associate or immediate family member of a PEP; * Has approval been obtained by senior management to establish a business relationship with the individual?
* Has the source of wealth or funds been determined?
 |  |  |
|  | Name and Signature of Approver: |
|  |  |
| Where the customer has been given a risk rating of High, has enhanced due diligence been completed? |  |  |

 **Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient due diligence has been carried out in respect of this customer.

Signed: Date:

**CUSTOMER DUE DILIGENCE**

**for an OCCASIONAL TRANSACTION**

**(or a series of transactions) for ART AUCTIONS Equal to/Greater than €10,000**

**Part 1: Name and details of person carrying out the transaction**

Full name:

Home address:

**Part 2: Risk Assessment**

Following a risk assessment, carried out in accordance with the business’s Anti-Money Laundering (AML) Policies and Procedures, and taking into account all risk factors identified therein;

The risk rating associated with this customer is; Low Medium High

**Part 3: Customer Due Diligence (CDD)**

|  |  |  |
| --- | --- | --- |
|  | YES/NO | Details (i.e. description of documents/info provided) |
| Has photo ID been provided?  |  |  |
| Has official proof of address been provided? |  |  |
| Was the customer present when identified? |  | N/A |
| Where the customer was not present, were additional measures taken to identify the individual? (e.g. 2nd form of ID, confirmation of custom with an acceptable institution) |  |  |
| Is the customer a Politically Exposed Person (PEP)[[6]](#footnote-6), a Close Associate of a PEP or an Immediate Family member of a PEP? |  |  |
| Where the individual is a PEP, close associate or immediate family member of a PEP; * Has approval been obtained by senior management to establish a business relationship with the individual?
* Has the source of wealth or funds been determined?
 |  |  |
|  | Name and Signature of Approver: |
|  |  |
| Where the client has been given a risk rating of High, has enhanced due diligence[[7]](#footnote-7) been completed? |  |  |

 **Part 4: Declaration of CDD by Property Service Provider**

I am satisfied that sufficient due diligence has been carried out in respect of this customer.

Signed: Da

**Anti-Money Laundering/Combatting the Financing of Terrorism (AML/CFT)**

**Staff Training Record for <Business Name>**

<Business Name> staff have received a copy of the AML/CFT Compliance Policy and Procedures Statement.

<Business Name> staff have been made aware of the obligations of the practise under the Criminal Justice Money Laundering and Terrorist Financing Act 2010 regarding:

* Customer Due Diligence & ongoing monitoring
* Identifying a PEP & seeking Senior Management Approval
* Making a Suspicious Transaction Report
* Internal Policies, Procedures & Risk Assessment
* Retention of Records

<Business Name> staff have received training[[8]](#footnote-8) as to how to recognise and handle transactions, which might relate to Money Laundering/Terrorist Financing.

Staff Declaration of Receipt of AML/CFT Training

|  |  |
| --- | --- |
| **Name of Staff Member** | **Signature and Date** |
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1. European Commission of High Risk Third Countries <https://ec.europa.eu/info/business-economy-euro/banking-and-finance/financial-supervision-and-risk-management/anti-money-laundering-and-counter-terrorist-financing/eu-policy-high-risk-third-countries_en> [↑](#footnote-ref-1)
2. The Central Register of Beneficial Ownership of Companies and Industrial and Provident societies - <https://rbo.gov.ie/>

The Beneficial Ownership Register for Certain Financial Vehicles - <https://www.centralbank.ie/regulation/anti-money-laundering-and-countering-the-financing-of-terrorism/beneficial-ownership-register> [↑](#footnote-ref-2)
3. Guidance on completing an STR <http://psr.ie/en/PSRA/27-01-2021%20Suspicious%20Transaction%20Reporting%20Flyer.pdf/Files/27-01-2021%20Suspicious%20Transaction%20Reporting%20Flyer.pdf> [↑](#footnote-ref-3)
4. The definition of a Politically Exposed Person (PEP) can be found in Section 4 of this Policies & Procedures document [↑](#footnote-ref-4)
5. Guidelines on carrying out enhanced due diligence are in Section 4 of this Policies & Procedures document [↑](#footnote-ref-5)
6. The definition of a Politically Exposed Person (PEP) can be found in the Anti-Money Laundering (AML) Policies and Procedures for Property Services Providers, associated with this form and available at [www.psr.ie](http://www.psr.ie) [↑](#footnote-ref-6)
7. Guidelines on completing enhanced due diligence can be found in the Anti-Money Laundering (AML) Policies and Procedures for Property Services Providers, associated with this form and available at [www.psr.ie](http://www.psr.ie) [↑](#footnote-ref-7)
8. The PSRA recognises in-house training as sufficient/appropriate for non-licenced staff. Licenced staff are expected to complete an AML/CFT module as part of their annual CPD requirements. [↑](#footnote-ref-8)