

Introduction

Pursuant to AML 1.2.1 of the ADGM Anti-Money Laundering and Sanctions Rules and Guidance (“AML Rules”), the ADGM AML Rules apply to Designated Nonfinancial Businesses or Professions (“DNFBPs”). The Proposed DNFBP Firm’s Policies and Procedures for AML/TFS (“**P&Ps**”) must cover all relevant rules under the AML Rules in completing this form.

The information provided in this form serves as supplementary information to the ADGM RA to serve as evidence that the proposed DNFBP firm meets the criteria under AML 15.2.1 that it is: (a) fit and proper to perform AML/TFS functions; and (b) it has adequate resources, systems and controls, including policies and procedures, to comply with all applicable AML/TFS requirements.

Entity Name	
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Notes for completing this form

- All sections must be completed with reference to the relevant section in the **P&Ps** in the blank column provided below. Incomplete form may be returned for re-submission.

	Topic	Reference to AML/TFS Policies and Procedures	Comments (if any)
A.	Money Laundering Reporting Officer ('MLRO')		
A.1	Responsibilities of the MLRO are included, including any other roles the MLRO may hold		
A.2	Procedures are in place to fulfill the role of the MLRO in their absence, if any. Deputy MLRO is appointed in line with AML 12.1.5		
A.3	MLRO reporting obligations are indicated.		
	MLRO obligation to register to the goAML and the EOCN Notification Sanctions Alert		
B.	Business Risk Assessment		
B.1	Framework is in place to identify and assess inherent risks, risk mitigation and residual risk level		
	The framework outlines the frequency of the review of the Business Risk Assessments (e.g., annually, following significant changes), the methodology used, and documentation of the assessment process.		
C.	Customer Risk Assessment		
C.1	Framework is in place which include a risk scoring model or risk assessment tool and describe the degree of CDD to be performed.		

	There are in place defined scoring criteria, procedures on how the risk assessment informs CDD and documented frequency of ongoing CDD review.		
	The framework outlines the frequency of the review of the Customer Risk Assessment (e.g., annually, following significant changes),		
D.	Customer Due Diligence (“CDD”)		
D.1	Procedures are in place in conducting CDD, including standard, simplified and enhanced CDD procedures including the criteria required for each type of CDD. Please provide the templates utilized.		
D.2	Procedures are in place for conducting ongoing CDD and the frequency of the review in accordance with the Customer Risk Assessment		
D.3	There are measures in place to ensure that CDD is undertaken for each client type (individual, body corporate) relative to their risk rating.		
D.4	If all or some of elements of the CDD are outsourced to third parties, the arrangements comply with AML 8		
D.5	Procedures are in place for identifying the beneficial owners, particularly for complex corporate structures, and the process for verifying customer identities.		
E.	Politically Exposed Persons (PEP)		
E.1	There are systems and controls to determine whether a customer or beneficial owner is a PEP and there are measures taken when a PEP is identified		
	There are enhanced CDD measures applied to PEPs and escalation procedures for dealing with potential PEP-related risks.		
F	Sanctions & other international obligations		
F.1	Arrangements are in place in maintaining effective systems and controls to ensure that on an ongoing basis it is properly informed as to, and takes reasonable		

	measures to comply with, relevant government, regulatory and international sanctions, resolutions and findings.		
	Specify the sources used to screen customers against sanctions lists (e.g., UAE, HM Treasury, OFAC, UN, EU) and FATF high-risk jurisdictions, as well as the tool employed for these screenings, including the frequency at which they are conducted.		
G	Training & Awareness		
G.1	Anti Money Laundering training to relevant Employees aligns with AML 13		
	The training curriculum, frequency, and record-keeping are clearly defined		
H	Suspicious Activity/Transaction Report		
H.1	There are policies, procedures, systems, and controls to monitor & detect suspicious activity aligns with AML 14.		
	There are procedures for reporting suspicious transactions / activities, the process for internal review, and the escalation to relevant authorities.		
I	Applicable laws and regulations		
I.1	There is reference to the up-to-date applicable laws and regulations i.e., Federal Laws and the ADGM AML Rulebook		
J	Governing Body & Senior Management		
J.1	The governing body or senior management handles the following: a) review, approval and implementation of policies & procedures. b) review and approval of PEPs, higher-risk clients, transactions or products; c) review and approval of AML compliance reports		
	The manual outlines the responsibilities of the board and senior management in overseeing AML/CFT compliance.		
K	Record Keeping		
K.1	Record keeping obligations align with AML 4.5, 13.3, 14.5		

Declaration

I/We, the undersigned representatives of this present DNFBP under formation, confirm that I/we have the authority to complete this form and declare that to the best of my/our knowledge, the information provided on this form and any supporting documents submitted along with this form are true, accurate and complete.

I/We understand that the information and supporting documents submitted are subject to review and verification and any incomplete or inaccurate submission may result in delay or disqualification. I/We understand that, under Section 984 of the ADGM Companies Regulations 2020 and Section 39(4) of the ADGM Commercial Licensing Regulations 2015, it is an offense to knowingly or recklessly provide to the Registrar any document or statement that is misleading, false or deceptive in a material particular.

I/We, understand that any personal data provided to the ADGM will be used to discharge its regulatory functions under the Abu Dhabi Law No. 4 of 2013, as amended, and other relevant legislation and that such personal data may be disclosed to third parties for those purposes only.

Name:

Title:

Signature: