



BY E-MAIL

3 March 2016

To the Senior Executive Officers and Money Laundering Reporting Officers of Relevant Persons

RE: Guidance to complete DFSA's Annual AML Return

Dear SEO and MLRO,

As you are well aware, the DFSA introduced the Annual AML Return in 2013. We view this reporting requirement as an integral part of our effort to combat money laundering and terrorist finance. As this report allows the DFSA to identify relevant AML issues and trends that might be emerging in the DIFC.

Following our review of the Annual AML Returns submitted over the past two years, we wish to provide guidance, as set out in **Appendix A**, to assist you in completing the return for the next reporting date. This guidance letter complements the notes within the Annual AML Return, [Dear SEO Letter – Annual Anti-Money Laundering \(AML\) Return](#) published on 31 March 2015 and the DFSA Report ([Anti-Money Laundering Return – Analysis and Guidance](#)) published in April 2015, which are also available on the DFSA's website.

We remind you of the following in completing the next Annual AML Return:

- The Annual AML Return is due within four months of your financial year end. A failure to submit on time is considered a breach of AML Rule 14.5.1. The the DFSA will consider that in the assessment of your compliance with AML obligations.
- You should submit the completed Annual AML Return to the DFSA electronically, via email, to AMLReturns@dfsa.ae in the following subject format: YYYYMMDD_Name of Firm. Where you are required to make the submission over a number of emails, please use the same format as indicated earlier with the following describer 1 out of total number (eg: YYYYMMDD_Name of Firm_1 out of 6).
- You are required to answer all applicable questions in full. You may supplement answers by referring to appropriate policies and procedures and referencing page numbers as supporting evidence.

Please note that the DFSA might reject any Annual AML Return that it deems to be materially incomplete or deficient. As a result, you will be required to re-submit the return addressing all the deficiencies identified.

This letter and its attachments should be shared with members of your senior management, Compliance Officer and Money Laundering Reporting Officer.

You should contact your DFSA relationship manager, if one has been assigned, or via the [DFSA contact portal](#) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bryan Stirewalt', is written over a light blue horizontal line.

Bryan Stirewalt
Managing Director, Supervision

Cc: Compliance Officers and Money Laundering Reporting Officers

Appendix A – Guidance for completing the Annual AML Return

AML Return Ref.	AML Rulebook Reference	AML Return	Guidance ¹
<p><i>The Annual AML Return requires the a Relevant Person to respond to the following sections:</i></p>			
Section A. Governing Body/Senior Management Declaration			
Section A	AML Glossary	<i>The contents of this AML return are required to be acknowledged and signed by every member of the Relevant Person's Governing Body and/or senior management prior to submission to the DFSA.</i>	<p>Please note the definitions of Governing Body and senior management in the AML Glossary.</p> <p>The DFSA requires the Annual AML Return to be acknowledged and signed by the Governing Body/senior management. Where the Relevant Person wishes to do this via board resolution or other mechanism, please attach such mechanism to your submission.</p>
C1	AML1.2.1	<i>Name/s of all individuals forming the senior management of the firm. Refer to definition in AML Glossary.</i>	
Section C. Compliance with AML Obligations			
Money Laundering Reporting Officer (MLRO) Details			
C2	AML11.2.1	<i>Name of appointed MLRO.</i>	Please name the current appointed MLRO.
C3	AML11.2.5	<i>Is the MLRO role outsourced?</i>	<p>If the MLRO role is outsourced, please provide the following:</p> <ul style="list-style-type: none"> • Name of outsource provider • Confirmation that an outsourcing agreement is in place. • Date of effect of the outsourcing agreement.
C4	AML11.4.1	<i>Describe the MLRO's role within, or association with, the Relevant Person, including any other roles within the Relevant person.</i>	<p>Element 1: Please confirm that the MLRO is at sufficient seniority.</p> <p>Element 2: Who does the MLRO report to both on a day to day level and on AML/CTF matters?</p> <p>Element 3: Please confirm that the MLRO has direct access to senior management and the Governing Body.</p> <p>Element 4: Please confirm that the MLRO role covers all these responsibilities as set out in AML11.4 and are reflected in the MLRO's job description.</p> <p>Element 5: Does the MLRO hold other titles or undertake other functions or duties for the Relevant Person or for other Group entities?</p> <p>If yes, Please list all other roles that the MLRO is involved in.</p>
C5	AML11.2.3	<i>Name of appointed deputy MLRO, where applicable.</i>	<p><i>Only applicable to Authorised Firms, excluding Representative Offices.</i></p> <p>AML11.2.3 requires an Authorised Firm to appoint an</p>

¹ Where a relevant section of the AML Return is not applicable by the Relevant Person, please state why.

			<p>individual to act as a deputy MLRO to fulfil that role in the MLRO's absence.</p> <p>Element 1: Please provide the name of the Deputy MLRO.</p> <p>Element 2: Please explain how the identity of the Deputy MLRO has been documented and disseminated to senior management and all staff.</p> <p>Element 3: What other functions does the Deputy MLRO undertake?</p>
C6	AML11.2.3	<i>Describe the arrangements if any within the Relevant Person to deal with absences of the MLRO.</i>	<p><i>Applicable to Relevant Persons other than Authorised Firms.</i></p> <p>What arrangements are in place to deal with absences of the MLRO?</p>
AML Responsibilities			
C7	AML1.2.1(2)	<i>Explain how the Relevant Person's senior management comply with the requirements of AML Rule 1.2.1(2) providing examples from the relevant period.</i>	The Relevant Person should provide examples from the relevant period that demonstrate the exercise of due skill, care and diligence by senior management in carrying out their responsibilities under the DFSA's AML Module.
Section D. Applying a Risk Based Approach			
Assessment of Business Risk			
D1	AML5.1.1(a) AML5.1.1(b) AML5.1.1(c)	<i>Please provide the latest version of the Relevant Person's business AML risk assessment.</i>	<p>The Relevant Person is required to provide a copy of its AML Business Risk Assessment.</p> <p>Element 1: How often does the Relevant Person perform its AML Business Risk Assessment?</p> <p>Please extract the following information from your AML Business Risk Assessment:</p> <p>Element 2: Date of approval by senior management of the Business AML Risk Assessment in the following format [mm-yyyy].</p> <p>Element 3: Please list the vulnerabilities considered in your AML Business Risk Assessment.</p> <p>Element 4: What did your AML Business Risk Assessment identify as the AML/CTF threats pertaining to your business?</p> <p>Element 5: Has the Relevant Person developed a risk mitigation program on the identified AML/CTF threats pertaining to its business?</p>
AML Systems and Controls			
D2	AML5.2.1(a)	<i>Attach the Relevant Person's AML Policies and Procedures.</i>	<p>The Relevant Person is required to provide copies of its AML/CTF Policies and Procedures.</p> <p><i>Please note that you are not required to attach supporting documentation where it has been provided to the DFSA in your previous AML Return, unless such documents have</i></p>

			<p><i>been updated or amended.</i></p> <p>Element 1: Please identify each manual or resource, aside from the AML Manual, relevant to the Relevant Person's AML/CTF Framework.</p> <p>Please explain whether your AML/CTF policies and procedures are part of a group-wide policy and/or they are bespoke to the DIFC.</p> <p>Please extract the following information from your AML/CTF Policies and Procedures:</p> <p>Element 2a: How often are the AML/CTF policies and procedures updated?</p> <p>Element 2b: Please state the date of the last update in the following format [mm-yyyy].</p> <p>Element 2c: Following your most recent review, please summarise any material revisions or updates made during the last review cycle.</p> <p>Element 2d: Please confirm that the revisions/updates were approved by the Governing Body/senior management.</p> <p>Element 3: Does the Relevant Person have in place procedures to assess money laundering or terrorist financing risk posed by new products and changes in services or delivery channels prior to commencement?</p> <p>Element 4: Does the Relevant Person's AML/CTF procedures define a Politically Exposed Person (PEP) in accordance with DFSA requirements</p> <p>Element 5: Does the Relevant Person have in place procedures for record retention including the form that the records are maintained and for how long?</p> <p>Element 6: Where a Relevant Person maintains records outside the DIFC, does it have in place procedures to access and obtain them readily?</p> <p>Element 7: Does the Relevant Person have a documented Fraud Prevention Policy?</p> <p>Element 8: Does the Authorised Firm have documented procedures for entering into correspondent banking customer relationships?</p>
D3	AML5.2.1(c)	<i>Please state the date or dates when the risk assessment was last</i>	<p>Element 1: Did the Relevant Person carry out an assessment on the adequacy of its AML/CTF systems and controls during the</p>

		<p>carried out by the Relevant Person on the adequacy of its AML systems and controls?</p> <p>Provide or attach a summary of the findings of this assessment.</p>	<p>relevant period? If yes, please attach a copy of the findings or results of this assessment.</p> <p>Element 2: If yes, please state the date in the following format [mm-yyyy].</p> <p>Element 3: Please list the material findings from this assessment.</p> <p>Element 4: What action was taken by the Relevant Person to address these findings?</p>				
Assessment of Customer Risk							
D4	AML6.1.1	<p>Explain how the risk assessment of the Relevant Person's customers has been undertaken.</p>	<p>Element 1: Please explain the Relevant Person's approach to the Customer Risk Assessment process.</p> <p>Where there are different approaches because of different business lines please highlight these differences.</p> <p>Element 2a: Please explain the risk rating methodology adopted in your Customer Risk Assessment.</p> <p>Element 2b: How do your risk rating categories differ from one another?</p> <p>Element 3: Who carries out the Customer Risk Assessment?</p> <p>Element 4: How is your Customer Risk Assessment recorded for each customer? (e.g. risk matrix, narrative, etc)</p>				
D5	AML4.1.1(b)(iii)	<p>Explain how the Relevant Person has documented the risk assessment of its customers.</p> <p>It is sufficient to provide any blank templates used by the Relevant Person when documenting the risk assessment of its customers.</p>	<p>The Relevant Person is required to provide a blank copy of any templates used to assess or document the AML/CTF risk of its customers.</p> <p><i>Please note that you are not required to attach supporting documentation where it has been provided to the DFSA in your previous AML Return, unless such documents have been updated or amended.</i></p>				
Section E. Customer & Customer Due Diligence							
E1	AML Glossary	<p>How many customers does the Relevant Person have as at the date of this Return?</p> <p>Refer to definition in AML Glossary.</p>	<p>Please note the definition of a Customer in the AML Glossary.</p> <p>Element 1: The reported figure should reflect the total number of customers as at the endpoint of the relevant period.</p> <p>Element 2: Please provide a breakdown of the Relevant Person's Customers and the assigned risk rating in the following format:</p> <table border="1" data-bbox="906 1822 1328 1885"> <thead> <tr> <th>Risk Rating</th> <th># of Customers</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table> <p><i>Where the Relevant Person relies on the definition of Prescribed Low Risk Customer, please indicate this as a</i></p>	Risk Rating	# of Customers		
Risk Rating	# of Customers						

			<i>separate risk rating category.</i>
E2	AML6.1.1(1)(b)	<i>Please summarise how the Relevant Person determines the money laundering risk of a customer and assigns the customer an appropriate risk rating.</i>	Please skip this question pending revision to format.
E3		<i>Explain the Relevant Person's risk categories and provide the number of customers assigned to each risk category.</i>	Please skip this question pending revision to format.
Politically Exposed Persons (PEP)			
E4	AML5.2.1(b)(ii)	<i>Explain the systems and controls used by the Relevant Person to determine whether a customer or beneficial owner is a PEP.</i>	<p>Element 1: What methods do you use in order to identify PEPs?</p> <p>Element 2: Are you required to seek senior management approval to take-on a Customer or has a Beneficial Owners identified as a PEP?</p>
E5		<i>How many customers or beneficial owners have been identified as a PEP as at the date of this Return.</i>	<p>Please note that the definition of Beneficial Owner and PEP in the AML Glossary.</p> <p>The reported figure should be the number of relationships that have a PEP exposure. E.g. a Corporate customer with multiple PEPs as shareholders would constitute one relationship.</p> <p>Please ensure that the reported figure is for the relevant period.</p>
Customer Due Diligence (CDD)			
E6	AML7.3.1 AML7.4 AML7.5	<i>Explain the steps undertaken by the firm in conducting CDD including Simplified and Enhanced CDD.</i>	<p>Element 1: Does the Relevant Person take into consideration the AML/CTF risk rating assigned to the Customer when performing due diligence process on that Customer?</p> <p>Element 2: Explain how your due diligence processes differs to address the AML/CTF risk rating assigned to each Customer?</p> <p>Element 3: Please elaborate on the due diligence undertaken on a correspondent banking customer.</p>
Ongoing CDD			
E7	AML7.6.1	<i>Explain how the Relevant Person undertakes ongoing monitoring of its customers and their transactions?</i>	<p>Element 1: What is the frequency and scope of your ongoing monitoring program?</p> <p>Element 2: Does the Relevant Person take into consideration a customer's profile and expected activity in its ongoing due diligence process?</p> <p>Element 3: How does the Relevant Person undertake ongoing monitoring of its customers?</p> <p>Element 4: How does the Relevant Person undertake ongoing</p>

			<p>monitoring of transactions?</p> <p>Element 5: Who is responsible for transaction monitoring within the Relevant Person?</p> <p>Element 6: Who is responsible for reviewing flagged transactions and/or activity for further examination?</p> <p>Element 7: Does the Relevant Person apply enhanced monitoring for higher risk customers, products or services?</p> <p>If yes, please elaborate on what this entails.</p> <p>Element 8: What ongoing monitoring is undertaken on a correspondent banking customer?</p>
E8	AML7.6.1(d)	<p><i>When was the last time that the Relevant Person reviewed the adequacy of the CDD information it holds on customers and beneficial owners?</i></p> <p><i>What were the material outcomes or findings of this review, if any?</i></p>	<p>Element 1: In connection with its ongoing CDD, has the Relevant Person reviewed the adequacy of the information it holds on Customer & Beneficial Owner during the relevant period?</p> <p>Element 2a: What was the nature and scope of this review?</p> <p>Element 2b: Was this done on a customer by customer basis (i.e. anniversary date) or as part of a broader initiative based on risk category or other criteria?</p> <p>Element 2c: When did this review occur?</p> <p>Element 3: Were there any material outcomes of this review? If a written report was prepared to address the outcomes or findings of this review, please attach a copy of that report to this Return. If no written report was prepared, please summarise the nature of these findings.</p> <p>Element 4: Describe any action(s) taken by the Relevant Person in response to this review.</p>
Failure to conduct or complete CDD			
E9	AML7.2.1(3)(d) AML7.2.1(4)	<p><i>Has the Relevant Person been unable to conduct or complete CDD within the 30 day period specified in AML Rule 7.2.1(3)(d) for any customer?</i></p> <p><i>If yes, please provide details of the event and what steps were taken or are being taken by the Relevant Person to conduct or complete CDD or to dispose of the matter. Please list in a separate</i></p>	<p>Element 1: Was the Relevant Person unable to complete CDD within 30 days after the establishment of a business relationship?</p> <p>Element 2: If answering yes to the above, how many customers were impacted during the relevant period?</p> <p>Please provide the following details for each customer impacted.</p> <p>Element 2a: Explain the cause(s) for the delay in completing CDD.</p> <p>Element 2b:</p>

		<p><i>appendix if there is insufficient space?</i></p>	<p>Please confirm whether CDD has been completed complete for each customer impacted.</p> <p>Element 2c: How long did it take the firm to complete process for each customer impacted?</p> <p><i>Please state your response in number of days.</i></p>
E10	AML7.7.1(1)	<p><i>Has the Relevant Person been unable to conduct or complete CDD for any customer during the relevant period? If yes, explain the resulting action taken by the Relevant Person.</i></p>	<p>Element 1: Was the Relevant Person unable to complete or conduct CDD for any customer during the relevant period?</p> <p>Element 2: How many customers were impacted during the relevant period?</p> <p>Element 3: Please state whether or not the customer relationship has been terminated or describe the steps taken by the Relevant Person to complete CDD or to resolve any outstanding items?</p>
Section F. Reliance & Outsourcing			
F1	AML8.1.1	<p><i>Does the Relevant Person rely on any third parties to conduct one or more elements of CDD on its behalf?</i></p> <p><i>If yes, please describe the circumstances in which such reliance is placed.</i></p>	<p>In order to assist you in your response to Section F. Reliance & Outsourcing, please note the DFSA's comments in the AML Return – Analysis and Guidance (link: Here) published in April 2015, which is available on the DFSA's website.</p> <p>Element 1: Does the Relevant Person rely on a third party to conduct one or more elements of CDD on its behalf? (Reliance on an outsourced CO or MLRO alone does not require a 'yes' answer to this question. However, where an outsourced provider relies on other parties to support CDD processes may require an affirmative response to this question.)</p> <p>Element 2: Please identify the third party.</p> <p>Element 3: Please confirm that the Relevant Person undertook appropriate due diligence on the third party and that this assessment has been documented by the Relevant Person.</p> <p><i>Please refer to AML Rule 8.1.1 which sets out the requirements regarding to reliance on a third party.</i></p> <p>Element 4: If the third party that the Relevant Person relies on falls under AML8.1.1(1)(b) or AML8.1.1(1)(c) or AML8.1.1(1)(d), please provide the following details:</p> <ul style="list-style-type: none"> Name of the Financial Services Regulator or other competent authority responsible for supervision of compliance with AML regulations in the respective jurisdiction. Confirm that the AML Regulations are equivalent to the standards set out in the FATF Recommendations. <p>Element 5</p>

			<p>What are the elements of CDD that the Firm relies on a third party to complete?</p> <p>Element 6: <i>Applicable to Group entities</i> Where reliance was placed on a Group entity, how does the Relevant Person satisfy itself that elements of CDD and ongoing CDD were adequately performed?</p>
F2	AML8.2.1	<p><i>Does the Relevant Person outsource any one or more elements of its Customer Due Diligence obligations?</i></p> <p><i>If yes, please describe the arrangements.</i></p>	<p>In this section please explain each aspect of CDD that the Relevant Person has formally outsourced to a third party, excluding the outsourcing of the MLRO function itself.</p> <p>Please identify each provider and confirm appropriate due diligence was conducted.</p>
Section G. Audit (this section is only applicable to Authorised Persons)			
<p>Please note that the DFSA requires an Authorised Person's audit function to conduct regular reviews and assessments of the effectiveness of the Authorised Person's anti-money laundering policies, procedures, systems and controls <u>and</u> its compliance with the obligations set out in the AML Module.</p> <p>If the Authorised Person has <u>not</u> carried out a review during the relevant period, please state the reason in section G1. The responses to G2 and G3 would then be marked as "Not Applicable."</p>			
G1	AML9.4	<p><i>When was the last time the Authorised Person's audit function conducted a review of its money laundering policies, procedures, systems and controls and its compliance with the obligations under the AML module?</i></p>	<p><i>Please note guidance under AML9.4.1 as to what the DFSA expects this review to cover.</i></p> <p>Element 1: Has the Authorised Person conducted a review of its money laundering policies, procedures, systems and controls during the relevant period?</p> <p>Element 2: Who undertook this review?</p> <p>Element 3: Is the reviewer independent from the AML Function?</p> <p>Element 4: Please provide the date of this review in the following format [mm-yyyy]</p> <p>Element 5: Please list the scope of this review.</p>
G2		<p><i>Please attach the relevant findings of the last audit.</i></p>	<p>The Authorised Person is required to provide a copy of the audit findings.</p> <p>Please explain how the findings of this review are reported to senior management.</p>
G3		<p><i>What action was taken by the Authorised Person in response to these findings and by whom?</i></p>	<p>Element 1a Were there any material findings from this review?</p> <p>Element 1b: What were the material findings?</p> <p>Element 1c: What action(s) were taken in response to these findings, and who is responsible for each of these, and have they all been resolved?</p>
Section H. Sanctions and Other International Obligations			
<p>Please note that your response to Section H. Sanctions and Other International Obligations should include consideration of Relevant United Nations Resolutions and sanctions, as well as Government, regulatory and international findings.</p>			
H1	AML10.2.1	<p><i>Describe the Relevant</i></p>	Element 1a:

		<p><i>Person's systems and controls to obtain and make use of relevant resolutions or sanctions issued by the United Nations Security Council.</i></p> <p><i>Your response should address the frequency of checks? Who is checked? What sorts of payments are checked?</i></p>	<p>How does the Relevant Person locate information on relevant resolutions or sanctions issued by the UNSC which may relate to its business and customers?</p> <p>Element 1b: What does the Relevant Person do with this information?</p> <p>Element 1c: How do you document this assessment?</p> <p>Element 2: How often does the Relevant Person check the relevant resolutions or sanctions issued by the UNSC?</p> <p>Element 3: Does the Relevant Person use sanction screening software?</p> <ul style="list-style-type: none"> • If yes, please list the name(s) of the screening software. • Where the Relevant Person uses a proprietary system, please indicate so in your response. <p>Element 4: Please explain which persons (i.e., customer, BO, directors, affiliated entities, etc.) that the Relevant Person screens as part of its due diligence process?</p> <p>Element 5: Does the Relevant Person have a procedure to monitor its customers against official lists, be it the UNSC or others, on an ongoing basis?</p> <p>Element 6: Does the Relevant Person screen the beneficiary and originator of wire transfers?</p>
H2	AML10.3.1	<p><i>Describe the Relevant Person's systems and controls for making appropriate use of findings, recommendations, guidance, directives, resolutions, sanctions, notices or other conclusions of government, regulatory and international standard setting bodies.</i></p>	<p>Element 1 With respect to any findings, recommendations, guidance, directives, resolutions, notices or other conclusions issued by the government of the UAE, or any government department of the UAE, the CBUAE, AMLSCU, UAE enforcement agencies and the DFSA in relation to the matters set out in AML10.3.1(2)(a) and AML10.3.1(2)(b);</p> <ul style="list-style-type: none"> • How does the Relevant Person locate this information which may relate to your customers? • What does the Relevant Person do with this information? • How do you document this assessment? <p>Element 2: With respect to any findings, recommendations, guidance, directives, resolutions, notices or other conclusions issued by FATF in relation to the matters set out in AML10.3.1(2)(a) and AML10.3.1(2)(b);</p> <ul style="list-style-type: none"> • How does the Relevant Person locate this information which may relate to your customers? • What does the Relevant Person do with this information? • How do you document this assessment?

			<p>Element 3: Excluding any lists referred to in Element 1 and 2 above, what other lists were used by the Relevant Person in connection to its sanctions screening policy during the relevant period?</p>																		
Section I. AML Training and Awareness																					
11	AML12.1.1	<i>Explain how the Relevant Person complies with the requirement to provide AML training to all relevant Employees.</i>	<p>Element 1: Has the Relevant Person provided AML/CTF training to all relevant employees?</p> <p>Element 2: Explain the topics covered and in doing so, please describe how they were tailored to your business activities?</p> <p>Element 3: How often does the Relevant Person provide AML/CTF Training to all relevant employees?</p>																		
12		<i>Summarise the methods of training used, whom it is provided by; the frequency of training and the means in which the Relevant Person ensures the effectiveness of the training.</i>	<p>Element 1: What media does the Relevant Person use to provide AML/CTF Training (i.e. classroom training, presentations, online resources, vendor programs, internal emails, etc)?</p> <p>Element 2: Please provide the date(s) of each training session during the relevant period. If multiple sessions, please list the date along with the name of the session and indicate if this is tailored to specific employees or attach the training log/register.</p> <p>Element 2: Who provided or conducted the AML/CTF Training?</p> <p>Element 3: How does the Relevant Person measure the effectiveness of the training provided?</p>																		
13		<i>Indicate the number of Employees that have received anti money laundering training for the year in question, broken down by positions held in the Relevant Person e.g. management, staff, etc.</i>	<p>Please provide your response in the following format:</p> <table border="1"> <thead> <tr> <th>Position</th> <th>Number of employees who have completed AML training</th> <th>Number of employees who have NOT completed AML training</th> </tr> </thead> <tbody> <tr> <td>Senior Management (e.g. CEO/SEO, Directors/senior management)</td> <td></td> <td></td> </tr> <tr> <td>Front Office (e.g. client relationship managers, front office personnel, etc)</td> <td></td> <td></td> </tr> <tr> <td>Compliance, AML, risk management (e.g. CO/MLRO, risk manager, etc)</td> <td></td> <td></td> </tr> <tr> <td>Other (e.g. Finance, HR, IT and back office activities such as admin/support)</td> <td></td> <td></td> </tr> <tr> <td>Total Number of Employees</td> <td></td> <td></td> </tr> </tbody> </table>	Position	Number of employees who have completed AML training	Number of employees who have NOT completed AML training	Senior Management (e.g. CEO/SEO, Directors/senior management)			Front Office (e.g. client relationship managers, front office personnel, etc)			Compliance, AML, risk management (e.g. CO/MLRO, risk manager, etc)			Other (e.g. Finance, HR, IT and back office activities such as admin/support)			Total Number of Employees		
Position	Number of employees who have completed AML training	Number of employees who have NOT completed AML training																			
Senior Management (e.g. CEO/SEO, Directors/senior management)																					
Front Office (e.g. client relationship managers, front office personnel, etc)																					
Compliance, AML, risk management (e.g. CO/MLRO, risk manager, etc)																					
Other (e.g. Finance, HR, IT and back office activities such as admin/support)																					
Total Number of Employees																					
14		<i>Indicate the number of relevant Employees that have not received training and provide an explanation for this.</i>	For each employee who has not received training during the relevant period, please explain why?																		

Section J. Suspicious Activity Reports			
J1	AML13.2.1	<i>Describe the Relevant Person's policies, procedures, systems and controls to monitor and detect suspicious activity.</i>	<p>Element 1: Please summarise the Relevant Person's process to monitor and detect suspicious activity or transactions?</p> <p>Your response should include:</p> <ul style="list-style-type: none"> • Method of reporting, • Timeframes, • Approvals; and • Method for documenting the MLRO review including the decision not to report it to the AMLSCU, etc. <p>Element 2a: Please describe the Relevant Person's external SAR process in terms of method of reporting to the AMLSCU, approvals, notifications to the DFSA, etc.</p> <p>Element 2b: Has the Relevant Person obtained access to the AMLSCU's SAR online reporting platform?</p>
J2	AML13.2.2	<i>How many internal Suspicious Activity Reports have been reported within the Relevant Person in the relevant period?</i>	Please provide a specific number only.
J3	AML13.3.4	<i>How many Suspicious Activity Reports have been reported to the AMLSCU by the Relevant Person in the relevant period?</i>	Please provide a specific number only.