

Anti-Money Laundering/ Countering the Financing of Terrorism (AML/CFT) Supervisory Expectations

Regulated dealers must “**AIM**” for effectiveness of their AML/CFT frameworks, systems and controls



Awareness of Risk

Be aware of money laundering/ terrorism financing/ proliferation financing (ML/TF/PF) risks:

- Conduct the necessary ML/TF/PF risk assessments for your business
- Ensure your frontline staff have a clear understanding of what these risks are and take steps in identifying them

Investment in Governance

Invest in anti-money laundering/countering the financing of terrorism/countering proliferation financing (AML/CFT/CPF) measures for your business:

- Develop internal policies, procedures and controls (IPPC) to manage and effectively mitigate ML/TF/PF risks
- Ensure your frontline staff are adequately trained on the IPPC

Management Oversight

Ensure active senior management oversight of AML/CFT/ CPF measures, including having reporting channels for staff to escalate red flags:

- Senior management is accountable for implementing AML/ CFT/ CPF measures in your business based on identified risks
- Review and update your ML/TF/PF risk assessments regularly