

**MONEY LAUNDERING AND TERRORIST FINANCING (ML/TF) FIRM-WIDE RISK ASSESSMENT**

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**ABOUT ICPAU**

The Institute of Certified Public Accountants of Uganda (ICPAU) is the National Professional Accountancy body in Uganda. The functions of the Institute, as prescribed by the Accountants Act, 2013 are to regulate and maintain the standard of accountancy in Uganda; and to prescribe and regulate the conduct of accountants and practicing accountants in Uganda. ICPAU has over 3,000 registered members and over 8,000 active students going through the Institute’s examinations scheme at various levels of completion.

**Vision**

To be a world class professional accountancy institute.

**Mission**

To develop, promote and regulate the accountancy profession in Uganda and beyond, in public interest.

**Core Values**

* Professional excellence
* Accountability
* Integrity
* Innovation

**TARGET AUDIENCE**

Institute of Certified Public Accountants of Uganda (ICPAU) provides guidance and services to help its members keep up to date with regulatory issues and developments. ICPAU represents professional accountants in Uganda and contributes to public affairs and other matters that impact on the accountancy profession.

The primary audience for these guidelines is practising accountants. This document is intended to provide guidance on the Money Laundering/Terrorist Financing (ML/TF) firm-wide risk assessment by accounting firms.

**DISCLAIMER**

Practising accountants should utilise this guidance in light of their professional judgment and the facts and circumstances in their firms and each particular engagement. The guidance does not deal with every single situation and exceptions may arise.

ICPAU disclaims any responsibility or liability that may occur, directly or indirectly, as a consequence of the use and application of this Guide.

1. **INTRODUCTION**

This guidance paper provides detailed guidance on Money Laundering/Terrorist Financing (ML/TF) firm-wide risk assessment by accounting firms. Information in this guidance paper does not replace the legislative measures outlined in the AML/CFT Law and its related Regulations.

1. **MANDATE**

The Institute of Certified Public Accountants of Uganda (ICPAU) is the designated supervisory authority for practising accountants in Uganda[[1]](#footnote-1), As such, ICPAU under the AML/CFT law[[2]](#footnote-2) is responsible for the supervision and enforcement of compliance by members of the accounting profession with the requirements imposed by this AML/CFT law, related regulations and such guidelines as may be issued by the Financial Intelligence Authority (FIA) or ICPAU.

ICPAU exercises powers under Section 21A of the Anti-Money Laundering Act 2013 (as amended) and Regulation 53 of the Anti-Money Laundering Regulations 2015.

These powers include:

* The power to issue codes and guidelines (Regulation 53(2)(d))
* The power to require information and documents (Regulation 53(2)(b))
* The authority to conduct site visits (Regulation 53(2)(a))
* The authority to enter premises[[3]](#footnote-3) (Regulation 53(2)(a))
* The power to impose civil penalties (Regulation 53(3) and (4))
* The power to publish decisions to impose penalties ((Regulation 53(4))
* The authority to take action to address non-compliance (Regulation 53(3)) and Section 21A of the Act)

ICPAU may exercise these powers only if the information sought to be obtained is reasonably required in connection with the exercise of its functions under AML/CFT law.

1. **RISK ASSESSMENT**

Pursuant to Section 6A of Anti-Money Laundering Act 2013 (as amended), every practicing accountant shall identify, assess and monitor that person’s money laundering and terrorism financing risks.

For more information on risk assessment obligations consult Section 6 and 6A of Anti-Money Laundering Act 2013 (as amended).

1. **REGULATORY FRAMEWORK**

Regulation 8(1) and (3) of the AML Regulations 2015 require the following:

***“8. Regular risk assessment***

*(1) An accountable person shall, on a regular basis, conduct anti-money*

*laundering and terrorism financing risk assessment to enable the accountable person to identify, assess, monitor, manage and mitigate the risks associated with money laundering and terrorism financing, taking into account all relevant risk factors.*

*(2) An accountable person shall document the results of the risk assessment carried out under subregulation (1), and, upon request, the accountable person may make the results of the risk assessment available to any competent authority.*

*(3) An accountable person shall, within forty-eight hours after conducting a risk assessment, give a copy of the risk assessment results to the Authority.*

*(4) In undertaking the risk assessment required under this regulation, an accountable person shall develop and implement mechanisms and systems that enable the accountable person to identify and assess money laundering and terrorism financing risks consistent with the nature of business and size of the accountable person.*

*(5) On the basis of the results of the risk assessment, an accountable person shall develop and implement policies, controls and procedures to enable the accountable person to effectively detect, manage and mitigate the identified risks in the future.*

*(6) An accountable person shall put in place policies, controls and procedures for monitoring the implementation of policies, controls and procedures to address the risks relating to money laundering and terrorism financing, and where necessary, enhance them on a regular basis.*

*(7) An accountable person shall update its risk assessment policies, controls and procedures whenever necessary, taking into account changes in its business such as entry into new markets or the introduction of new products, services and technologies.”*

1. **NATIONAL RISK ASSESSMENT**

The FIA conducts the National Risk Assessment (NRA) of Money Laundering and Terrorist Financing to take stock of ML/TF risk in Uganda. A shared understanding of ML/TF risks is crucial to effective risk mitigation. Practising accountants must consider results of the National Risk Assessment (NRA) in conducting their own risk assessments.

The Financial Action Task Force (FATF) recommendations emphasise that accountants availing the following services are vulnerable to ML/TF:

1. Buying and selling of real estate;
2. Managing of client money, securities, or other assets;
3. Management of bank, savings, or securities accounts;
4. Organisation of contributions for the creation, operation, or management of companies; and
5. Creation, operation or management of legal persons or arrangements, and buying and selling of business entities.
6. **MONEY LAUNDERING/TERRORIST FINANCING (ML/TF) RISKS**

ML/TF risks can be organised into three categories: (a) country/geographic risk, (b) client risk and (c) transaction/service and associated delivery channel risk, including products, transactions or delivery channels.

Practising accountants shall take appropriate steps to identify and assess the firm-wide risks, given their particular client base, that they could be used for ML/TF.

When assessing risks, practising accountants shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level of mitigation to be applied. Such risk assessment should be informed by findings of the NRA, the sectoral risk assessments conducted by ICPAU, and any other information which may be relevant to assess the risk level particular to their practice.

1. **FIRM-WIDE RISK ASSESSMENT STEPS**

A practical starting point for accounting firms (especially smaller firms) would be to take the following approach:

1. **Client acceptance and know your client policies**

Identify the client (and its beneficial owners where appropriate) and the true “beneficiaries” of the transaction. Obtain an understanding of the source of funds and source of wealth of the client, where required, its owners and the purpose of the transaction.

1. **Engagement acceptance policies**

Practising accountants should know the exact nature of the service that they are providing and have an understanding of how that work could facilitate the movement or obscuring of the proceeds of crime. Where a practising accountant does not have the requisite expertise, the practising accountant should not undertake the work.

1. **Understand the commercial or personal rationale for the work**

Practising accountants need to be reasonably satisfied that there is a commercial or personal rationale for the work undertaken. Practising accountants however are not obliged to objectively assess the commercial or personal rationale if it appears

reasonable and genuine.

1. **Be attentive to red flag indicators**

Practising accountants must exercise vigilance in identifying and then carefully reviewing aspects of the transaction if there are reasonable grounds to suspect that funds are the proceeds of a criminal activity, or related to terrorist financing. These cases would trigger reporting obligations.

1. **Developing an action plan**

Documenting an action plan is a viable way to interprete or assess red flags or indicators of suspicion. Once the action plan is developed, the practising accountant shall then consider what action, if any, needs to be taken.

1. **Documentation**

The outcomes of the above action will determine the level and nature of the evidence or documentation collated under a firm’s CDD/EDD procedures (including evidence of source of wealth or funds). Practising accountants should adequately document and record steps taken under (a) to (e).

1. **RISK FACTORS TO CONSIDER**
   1. **Services**

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| *Trust and company services* | Trust and company services are considered high risk when coupled with high-risk services or other higher risk factors. |
| *Forming a company by a corporate service provider in another jurisdiction* | Firms that offer registered office or nominee directorships are at risk as these can be used to conceal beneficial ownership or be used to facilitate the movement of money to offshore jurisdictions. |
| *Mainstream accounting* | There is a risk that accountants may legitimise false books, record or transactions. |
| *Payroll* | The National Risk Assessment (NRA) considers payroll services a risk as this can provide criminals with legitimate looking record of money movement |
| *Provision of tax advice and acting as a tax agent* | Under declaration of tax due to URA |
| *Company liquidation and associated services* | Can be used to mask the audit trail of money laundered through a company. |

* 1. **Geography/Country Risk**

A client may be higher risk when features of their business are connected to a

higher risk country as regards:

1. the origin, or current location of the source of wealth or funds;
2. where the services are provided;
3. the client's country of incorporation or domicile;
4. the location of the client's major operations;
5. the beneficial owner's country of domicile; or
6. target company's country of incorporation and location of major operations (for potential acquisitions).

There is no universally agreed definition of a higher risk country or geographic area but accountants should pay attention to those countries that are:

1. Countries/areas identified by credible sources as providing funding or  
   support for terrorist activities or that have designated terrorist organisations  
   operating within them.
2. Countries identified by credible sources as having significant levels of  
   organized crime, corruption, or other criminal activity, including source or  
   transit countries for illegal drugs, human trafficking and smuggling and illegal  
   gambling.
3. Countries subject to sanctions, embargoes or similar measures issued by  
   international organisations such as the United Nations.
4. Countries identified by credible sources as having weak governance, law  
   enforcement, and regulatory regimes, including countries identified by FATF  
   statements as having weak AML/CFT regimes, in relation to which financial  
   institutions (as well as DNFBPs) should give special attention to business  
   relationships and transactions.
5. Countries identified by credible sources to be uncooperative in providing  
   beneficial ownership information to competent authorities, a determination  
   of which may be established from reviewing FATF mutual evaluation reports  
   or reports by organisations that also consider various co-operation levels such  
   as the OECD Global Forum reports on compliance with international tax  
   transparency standards.
   1. **Customer/Client Risk**

The key risk factors that accountants should consider are:

1. The firm’s client base includes industries or sectors where opportunities for ML/TF are particularly prevalent.
2. The firm’s clients include PEPs or persons closely associated with or related to PEPs, who are considered as higher risk clients.
3. Clients conducting their business relationship or requesting services in unusual or unconventional circumstances.
4. Clients where the structure or nature of the entity or relationship makes it difficult to identify in a timely manner the true beneficial owner or controlling interests or clients attempting to obscure understanding of their business, ownership or the nature of their transactions, such as:
5. Unexplained use of shell and/or shelf companies, front company, legal  
   entities with ownership through nominee shares or bearer shares,  
   control through nominee and corporate directors, legal persons or  
   legal arrangements, splitting company incorporation and asset  
   administration over different countries, all without any apparent legal  
   or legitimate tax, business, economic or other reason.
6. Unexplained use of informal arrangements such as family or close  
   associates acting as nominee shareholders or directors.
7. Unusual complexity in control or ownership structures without a clear  
   explanation, where certain circumstances, structures, geographical  
   locations, international activities or other factors are not consistent  
   with the accountants’ understanding of the client’s business and  
   economic purpose.
8. Client companies that operate a considerable part of their business in or have major subsidiaries in countries that may pose higher geographic risk.
9. Clients that are cash (and/or cash equivalent) intensive businesses. These may include, for example:
10. Money or Value Transfer Services (MVTS) businesses (e.g. remittance houses, forex bureaux, money transfer agents and other businesses offering money transfer facilities);
11. Operators, brokers and others providing services in virtual assets;
12. Casinos, betting houses and other gambling related institutions and activities;
13. Dealers in precious metals and stones; and
14. Real estate agents and developers
15. Businesses that while not normally cash intensive appear to have substantial amounts of cash.
16. Non-profit or charitable organizations engaging in transactions for which there appears to be no logical economic purpose.
17. Clients who appear to actively and inexplicably avoid face-to-face meetings or who provide instructions intermittently without legitimate reasons and are otherwise evasive or very difficult to reach, when this would not normally be expected.
18. Clients who request that transactions be completed in unusually tight or accelerated timeframes without a reasonable explanation for accelerating the transaction.
19. Clients who have no address, or multiple addresses without legitimate reasons.
20. Clients who have funds that are obviously and inexplicably disproportionate to their circumstances (e.g. their age, income, occupation or wealth).
21. Unusually high levels of assets or unusually large transactions compared to what might reasonably be expected of clients with a similar profile.
22. Clients who are suspected to be engaged in falsifying activities through the use of false loans, false invoices, and misleading naming conventions.
23. Indicators that client does not wish to obtain necessary governmental approvals/filings, etc.
24. Reason for client choosing the accountant is unclear, given the firm’s size, location or specialisation.
25. Frequent or unexplained change of client’s professional adviser(s) or members of management.
26. Client is reluctant to provide all the relevant information or accountants have reasonable grounds to suspect that the information provided is incorrect or insufficient.
    1. **Transaction and associated delivery channel risk**

Accountants should not allow their client account to be used as a banking facility and should understand the rationale for why the client is using the firm’s clients’ money bank account before the transaction is initiated.

Services which may be provided by accountants and which (in some  
circumstances) risk being used to assist money launderers may include:

1. Use of pooled client accounts or safe custody of client money or assets without justification.
2. Situations where advice on the setting up of legal arrangements may be  
   misused to obscure ownership or real economic purpose (including setting up of trusts, companies or change of name/corporate seat or establishing  
   complex group structures)
3. In case of an express trust, an unexplained (where explanation is warranted) nature of classes of beneficiaries and acting as trustees of such a trust.
4. Services where accountants may in practice represent or assure the client’s standing, reputation and credibility to third parties, without a commensurate knowledge of the client’s affairs.
5. Services that are capable of concealing beneficial ownership from competent authorities
6. Services requested by the client for which the accountant does not have expertise except where the accountant is referring the request to an appropriately trained professional for advice.
7. Non-cash wire transfers through the use of many inter -company transfers within the group to disguise the audit trail.
8. Services that rely heavily on new technologies.
9. Transfer of real estate or other high value goods or assets between parties in a time period that is unusually short for similar transactions with no apparent legal, tax, business, economic or other legitimate reason.
10. Transactions where the client does not provide legitimate reasons for the transaction.
11. Services that have deliberately provided, or depend upon, more anonymity in relation to the client’s identity or regarding other participants, than is normal under the circumstances and in the experience of the accountant.
12. Use of virtual assets and other anonymous means of payment and wealth transfer within the transaction without apparent legal, tax, business, economic or other legitimate reason.
13. Transactions using unusual means of payment (e.g. precious metals or stones).
14. Acquisitions of businesses in liquidation with no apparent legal, tax, business, economic or other legitimate reason.
15. Payments received from un-associated or unknown third parties and payments for fees in cash where this would not be a typical method of payment.
16. Commercial, private, or real property transactions or services to be carried out by the client with no apparent legitimate business, economic, tax, family governance, or legal reasons.
17. Existence of suspicions regarding fraudulent transactions, or transactions that are improperly accounted for.
    1. **Delivery Channel Risk**

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| *Clients you have not met* | If the firm has not met its client face-to-face, it has increased the risk that the client is not who they say they are. The client may wish to hide their identity, or favour anonymity, if they are involved in criminal activity. The coronavirus pandemic meant that not meeting clients may be the norm. Firms should consider how this change impacts the risk within their take-on procedures and how they can mitigate those risks. |
| *Combining services* | Some services might not be inherently high risk, but when combined with other services or transactions become risky. For example, there might be legitimate reasons for setting up a company, but if that company is used to purchase property and disguise its beneficial owner, this increases the risk of money laundering. |

1. **ASSESSMENT OF RISK**
2. To assess the money laundering risk, you must consider the likelihood of the risk occurring, and the impact if the risk did occur.
3. Most risk management tools will identify a range of likelihood and impact that you can apply to your identified risks. You can determine your own ranges, or use risk management tools that are widely available over the internet.
4. if your firm has no experience of clients operating in a particular country, you could conclude that the risk is normal or high risk even if other firms may conclude it to be low risk.
5. **DOCUMENTING FIRM-WIDE RISK ASSESSMENT**

Practising accountants must always understand their ML/TF risks (for clients, countries or geographic areas, services, transactions or delivery channels). They should document those assessments in order to be able to demonstrate their basis and exercise due professional care and use compelling good judgement.

Practising accountants fail to satisfy their AML/CFT obligations by relying completely on a checklist risk assessment, where there are other clear indicators of potential illicit activity. Completing risk assessments in a time efficient yet comprehensive manner has become more important.

Each of these risks could be assessed using indicators such as low risk, medium risk and/or high risk. A short explanation of the reasons for each attribution should be included and an overall assessment of risk determined.

An action plan (if required) should then be outlined to accompany the assessment, and dated. In assessing the risk profile of the client at this stage, reference must be made to the relevant targeted financial sanctions lists to confirm neither the client nor the beneficial owner is designated and included in any of them.

A risk assessment of this kind should not only be carried out for each specific client and service on an individual basis, but also to assess and document the risks on a firm-wide basis, and to keep risk assessment up-to-date through monitoring of the client relationship. The written risk assessment should be made accessible to all

professionals that perform AML/CFT duties.

1. **RISK MITIGATION**

Practising accountants must have policies, controls and procedures that enable them to effectively manage and mitigate the risks that they have identified (or that have been identified by the country). They should monitor the implementation of those controls and enhance or improve them if they find the controls to be weak or ineffective. The policies, controls and procedures should be approved by senior management, and the measures taken to manage and mitigate the risks (whether higher or lower) should be consistent with national requirements and with guidance from competent authorities and supervisors.

Measures and controls may include:

* 1. General training on ML/TF methods and risks relevant to practising accountants.
  2. Targeted training for increased awareness by the practising accountants providing specified activities to higher risk clients or to practising accountants undertaking higher risk work.
  3. Increased or more appropriately targeted CDD or enhanced CDD for higher risk clients/situations that concentrate on providing a better understanding about the potential source of risk and obtaining the necessary information to make informed decisions about how to proceed (if the transaction/ business relationship can be proceeded with). This could include training on when and how to ascertain, evidence and record source of wealth and beneficial ownership information if required.
  4. Periodic review of the services offered by the practising accountant, and the periodic evaluation of the AML/CFT framework applicable to the practising accountant and the practising accountant’s own AML/CFT procedures, to determine whether the ML/TF risk has increased.
  5. Reviewing client relationships from time to time to determine whether the ML/TF risk has increased.

1. **CONCLUSION**

The firm should perform a firm-wide risk assessment that takes into account the size and nature of the practice; the existence of high-risk clients (if any); and the provision of high-risk services (if any). Once completed, the firm-wide risk assessment will assist the firm in designing its policies and procedures.

**APPENDIX: SAMPLE FIRM-WIDE RISK ASSESSMENT**

**ABC & CO ANTI-MONEY LAUNDERING (AML) FIRM-WIDE RISK ASSESSMENT**

*[It is a requirement for every accounting firm to have a documented firm-wide risk assessment. Before beginning this exercise, you should review the AML/CFT Law and its related Regulations. You should also read the FIA national risk assessment and FATF Guidance on the Risk-Based Approach for Accountants. Trends and risks within money laundering are constantly changing.*

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| Assessment of risk  *[Every accounting firm will have ML/TF risks. Therefore, it’s important to identify it. In this column, detail the risk your firm may have]* | Mitigating actions  *[In this column, you should state how you will alleviate the risk posed]* |
| Client risk  *[This section is the most significant. The range of clients and the associated risks are diverse and vast. You must consider whether your clients and their stakeholders have characteristics associated with money laundering and terrorist financing]* | |
| * *We have two clients operating in high-risk jurisdictions.* * *Many of our clients operate cash-intensive businesses such as restaurants, hairdressers and bars.* * *We do not have any high-net-worth individuals or PEPs.* * *We have several high-value businesses; high-end property rental/sales, wholesalers…* * *We have one charity.* | * *A client risk assessment is completed on each client during the onboarding stage and annually during our ongoing monitoring process. Every client is given a risk rating of either: low, medium or high.* * *CDD is performed on all clients deemed to be low or medium risk to verify client identity and business activities.* * *EDD is performed on all clients deemed to be high risk, such as the ones stated in the assessment of risk column.* * *We review the CDD and EDD files every year. The firm’s policies and procedures list the additional checks required, such as independently verifying documentation provided by the client.* * *Staff are provided with training to identify risks. This is conducted by the MLCO annually and external bi-annually. Training covers: red flags, case studies, relevant AML regulations, tipping-off, CDD, suspicious activity reports (SARs), how to deal with suspicious transactions. An assessment is conducted to ensure staff understanding.* * *All new clients are approved by the MLCO and at least one partner.* |
| Geography risk  *[You should consider whether your clients are established or linked to jurisdictions that are regarded as at high risk of money laundering or terrorist financing. You should either compile your own list of high-risk jurisdictions or make use of high-risk lists provided by reputable sources]* | |
| *We have clients who are based locally, nationally and overseas.*  *We have reviewed the FATF and UN sanction list, and although we have overseas clients, none operate in high-risk countries.* | *Although we have no clients operating in high-risk countries, we have systems and controls in place to address this risk. This includes…*  *Any client based nationally or overseas would be subject to additional checks – as it’s rare for our firm to offer services to clients outside of the immediate area. These checks would include…* |
| Products and services risk  *[In this section, you should consider whether any of your products or services have attributes known to be used by money launderers or terrorist financiers.]* | |
| *The FIA national risk assessment identified the following areas of business as posing the highest AML risk within the accountancy sector:*   * *Company and trust formation services: to mask the ownership of assets or transfer assets between persons.* * *False accounting: to provide a veneer of legitimacy to falsified accounts or documents used to conceal the source of funds.* * *Misuse of client accounts: performing high-value financial transactions for clients with no clear business rationale.* * *Exploitation of tax services: facilitation of tax evasion and VAT fraud.* | *Although the list is not exhaustive, you should consider whether you offer the services outlined and address how you will manage each risk: for example, staff training to identify red flags, EDD etc.*  *You should consider putting into context the scale of risk. For example, if less than 1% of your revenue is generated through company formation services, then it would be reasonable to consider this to be low risk for your firm.* |
| Transactions risk  *[Misuse of client accounts is currently considered to be a risk within the accountancy sector. If you hold a client account, put into context the risk. You should also consider the risk associated with your office account.]* | |
| *The firm holds one client account. It is only used to receive tax refunds from URA. Usually less than five transactions per year. The amounts are always less than UGX 10,000,000 and in line with what we would expect for the clients involved.* | *We only provide these services to two longstanding clients. Funds are always from a known and reputable source. The client account is operated by the MLCO and one partner only.* |
| Delivery channels risk  *[Do you meet your clients face to face? If not, you may face greater ML/TF risks because it can be more difficult to determine the identity and credibility of a client, both at the start of a relationship and throughout its course. You should also consider how and why the client has come to you.]* | |
| *All our local and national clients are met face to face at onboarding.*  *We do offer remote services to one overseas client.* | *We do offer online services – but all clients are met face to face at onboarding and typically at least once a year.*  *Although we did not meet the client when onboarding, he was referred to me via a longstanding customer. I conducted a video chat with him and conducted EDD. I have since met the client as well.* |
| Overall assessment of risk  *[You should summarise all the above; highlighting the key areas of risk. You should consider listing any other risks you identified that have not already been mentioned. It’s also beneficial to provide an overall profile of the firm.]* | |
| *Overall, 10% of our client base are considered higher than normal risk, 80% medium/normal risk and 10% low risk. Those considered low risk, are entities that operate in an already regulated market.*  *The majority of our clients work in the not-for-profits sector – so we are familiar with the type of activity and services they typically offer.*  *Our clients tend to be local and longstanding.*  *We believe the biggest risk to the firm is XXXX. However, we believe we are mitigating this risk by enforcing the following controls. They are XXXX* | |

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| Actions  *[Finally, list what actions you will take to address the risk identified. Below is an example]* |

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| **Action** | **Delivery date** | **Owner** |
| Perform annual compliance review | 01/01/2023 | [MLCO NAME] |
| Conduct AML Training | 01/03/2023 | [MLCO NAME] |
| Review AML Policies & Procedures | 01/06/2023 | [MLCO NAME] |

**Firm-wide risk assessment conducted by:** [MLCO NAME]

**Shared with:** [Partners and Directors of firm]

**Completed on:**

**Next review date:**

1. Section 1(l) of the Anti-Money Laundering (Amendment) Act 2017; Regulation 53 (1) of the Anti-Money Laundering Regulations 2015; and Section 138(b) of the Anti-Money Laundering Act 2013 [↑](#footnote-ref-1)
2. Anti-Money Laundering Act 2013 (as amended) and Anti-Terrorism Act 2002 (as amended) [↑](#footnote-ref-2)
3. Regulation 6(3) of the accountants’ (Practice) Regulations 2019 [↑](#footnote-ref-3)