



## Annual AML Return

This AML Return is only required to be completed by an **Authorised Person, Recognized Body, or Auditor** (referred to in this Form as “**Firm**”). The ADGM’s Financial Services Regulatory Authority (“FSRA”) expects Firms to complete the AML Return within 3 months of their Financial Year end, and retain it for inspection by the FSRA upon request.

- The purpose of the AML Return is to assist the FSRA in assessing a Firm’s compliance with its AML obligations.
- Any reference to “AML” or “money laundering” in this form is to be taken to include terrorist financing unless the context provides otherwise.
- The term “AML Rule” in this form refers to the FSRA’s [Anti-Money Laundering and Sanctions Rules and Guidance](#) (available on the ADGM website).
- Where appropriate, questions in the AML Return make reference to the AML Rules to assist in framing the context of your answer and determining if the question is applicable to your Firm.
- All answers in the AML Return must be typed. If there is insufficient space to answer a question, please attach the answer in an appendix.
- Do not leave any questions blank – if a question is not applicable this should be indicated as “N/A” in the response section.
- As described in AML Rule 15.5.1, while a Firm is not required to submit this AML Return to the FSRA, a Firm must complete the AML Return form on an annual basis and retain it for inspection by the FSRA upon request.

<b>Name of Firm</b>	
<b>Financial Services Permission Number</b> (for Authorised Persons only)	
<b>Return for the Financial Year Ending</b>	
<b>Date AML Annual Return Completed</b>	



## A Responsibility for Compliance with the AML Rulebook

**A1** Describe how the senior management of the Firm manages the responsibility of complying with the AML Rulebook in the event that a senior officer is not acting as the Money Laundering Reporting Officer (“MLRO”). [\[AML Rule 1.3.3\]](#)

[Insert text here]

## B General Compliance Requirements

**B1** How often does the Firm review the effectiveness of its AML policies, procedures, systems and controls? State when the firm last conducted such a review, who conducted it, and describe the scope of the review. [\[AML Rule 4.1.1 \(4\), 4.1.1 \(5\) and 4.1.1 \(6\)\]](#)

[Insert text here]

**B2** Does the Firm have any branches or subsidiaries operating outside of ADGM? [\[AML Rule 4.1.2\]](#)

If yes, please indicate:

- (i) the names of these entities;
- (ii) their relationship to the Firm;
- (iii) the jurisdictions they are domiciled in; and
- (iv) whether the firm’s AML policies, procedures, systems and controls are applied to them.

[Insert text here]

## C Applying a Risk-Based Approach to AML

**C1** Briefly describe how the Firm applies the Risk-Based Approach to assessing and addressing its AML risk. [\[AML Rule 5.1.1\]](#)

[Insert text here]



## D Business Risk Assessment

D

The Business Risk Assessment refers to a Firm's assessment of the AML risks facing its business and operations. The assessment involves assessing its AML vulnerabilities across, but not limited to, the various factors described in AML Rule 6.1.1(b). A business risk assessment is also commonly known as an "enterprise-wide AML risk assessment".

**D1** Describe the Firm's Business Risk Assessment methodology. State when the Firm last conducted such an assessment, and attach any relevant documentation for this. [\[AML Rule 6.1.1\]](#)

[Insert text here]

**D2** Did the results of the Firm's latest Business Risk Assessment require the Firm to undertake any remedial actions? If so, please provide details of these actions.

[Insert text here]

E

## AML Systems and Controls

**E1** Attach the Firm's AML Policies and Procedures. [\[AML Rule 6.2.1\]](#)

F

## Customer Risk Assessment/Customer Due Diligence

**F1** How many customers does the Firm have as at the date of this AML Return? Provide a breakdown of "active" versus "dormant" customers (and provide the Firm's definition of "dormant customers").

[Insert text here]

**F2** With regard to the Firm's customers, provide a breakdown in terms of:

a) Retail Clients, Professional Clients, and Market Counterparties

[Insert text here]

b) For Clients that are individuals: their nationalities and country of domicile

[Insert text here]



c) For Clients that are non-individuals: their country of incorporation / establishment

[Insert text here]

**F3** Firms are required to assign each Customer an AML risk rating proportionate to the Customer's AML risks. *[AML Rule 7.2.1 (1)]*

a) Describe the methodology that the Firm uses to assess the AML risk of a Customer and assign an AML risk rating.

[Insert text here]

b) Provide a breakdown of the number of Customers the Firm has assigned for each customer risk rating level.

[Insert text here]

**F4** Describe the steps undertaken by the Firm in conducting Customer Due Diligence ("CDD") including Simplified and Enhanced CDD, and the types of information collected on Customers to identify them and verify their identities.

*[AML Rule 8.3.1]*

[Insert text here]

**F5** Describe the systems and controls used by the Firm to determine whether a Customer or beneficial owner is a PEP. *[AML Rule 8.3.1(3)]*

[Insert text here]

**F6** How many of the Firm's customers or beneficial owners have been identified as a PEP as at the date of this Return?

[Insert text here]

**F7** How many of the Firm's customers are Restricted Scope Companies?

[Insert text here]

**F8** If the Firm has customers that are Restricted Scope Companies, what CDD information does it obtain to assess the AML risks of such customers?

[Insert text here]

**F9** Does the company allow non-face-to-face account opening? If yes, describe the circumstances where this is allowed, and the controls the Firm has to mitigate AML risks in such cases.

[Insert text here]



**F10** Has the Firm been unable, or not obliged, to complete CDD within 30 days of establishing a business relationship for any customer? If yes, please provide details of the event and what steps were taken or are being taken by the Firm to conduct or complete CDD or to dispose of the matter.

[AML Rule 8.2.1(3) and 8.2.1(4)]

[Insert text here]

## G On-going Customer Due Diligence

**G1** Explain how the Firm undertakes ongoing monitoring of its customers and their transactions.

[AML Rule 8.6.1]

[Insert text here]

**G2** How often does the Firm review the CDD information it holds on customers to ensure that it is kept up to date? [AML Rule 8.6.1(d)]

[Insert text here]

**G3** How often does the Firm review each Customer to ensure that the risk rating assigned to the Customer remains appropriate? [AML Rule 8.6.1(e)]

[Insert text here]

**G4** Were there any customers whose risk ratings changed during the year in question? If so, state the number of such clients and how their ratings changed.

[Insert text here]

## H Reliance and Outsourcing of AML Compliance

**H1** Does the Firm rely on any third parties to conduct one or more elements of CDD on its behalf? If yes, please list these third parties, describe the circumstances in which the Firm relies on them to conduct CDD on its behalf, and state whether these third parties are subject to any AML regulation.

[AML Rule 9.1.1]

[Insert text here]



**H2** If the Firm relies on any third parties to conduct CDD, describe the due diligence procedures the Firm carried out on these third parties and any concerns identified. [\[AML Rule 9.1.1\]](#)

[Insert text here]

## I Correspondent Banking

**I1** If the Firm has a Correspondent Account for a Correspondent Banking Client, describe the steps taken by the Firm to conduct due diligence on such clients at both account opening (including identifying any third parties that will use the Correspondent Account) and on-going monitoring of transactions processed through the Correspondent Account. [\[AML Rule 10.2.1\]](#)

[Insert text here]

## J

### Audit

Section H on Audit only applies to Authorised Persons and Recognized Bodies.

**J1** When was the last time the Firm's audit function conducted a review of its AML policies, procedures, systems and controls and its compliance with the obligations under the AML Rules? [\[AML Rule 10.4.1\]<sup>1</sup>](#)

[Insert text here]

**J2** If an AML audit of the Firm was conducted, please attach a copy of the latest AML audit report.

<sup>1</sup> The review undertaken for the purposes of AML Rule 10.4.1 may be undertaken by the Firm's internal audit function or by competent external professional audit or compliance professionals. The review should cover at least the following:

- (a) sample testing of compliance with the Authorised Person or Recognised Body's CDD arrangements;
- (b) an analysis of all notifications made to the MLRO to highlight any area where procedures or training may need to be enhanced; and
- (c) a review of the nature and frequency of the dialogue between the Senior Management and the MLRO.





**J3** Describe any actions that were undertaken by the Firm in response to any findings arising from the last AML audit (and indicate the person(s) in the Firm who were responsible for carrying out these actions).

[Insert text here]

## K

### Sanctions and Other International Obligations

**K1** Describe the Firm's systems and controls to obtain and make use of resolutions or Sanctions which it is required to comply with under the laws of ADGM or any other jurisdiction. [\[AML Rule 11.1.1\]](#)

[Insert text here]

**K2** Which reference lists does the Firm use to screen its customers against for money laundering and terrorism financing risks? [\[AML Rule 8.6.3\]](#)

[Insert text here]

**K3** Describe the Firm's systems and controls to obtain and make use of any relevant findings, recommendations, guidance, directives, resolutions, Sanctions, notices or other conclusions issued by the various bodies listed in AML Rule 11.2.1(1). [\[AML Rule 11.2.1\]](#)

[Insert text here]

## L

### Money Laundering Reporting Officer (MLRO)

**L1** Provide the name, designation and experience/qualifications of the MLRO. [\[AML Rule 12.1.1\]](#)

[Insert text here]

**L2** Is the MLRO role outsourced?

[Insert text here]

**L3** Aside from carrying out the AML responsibilities, describe any other roles the MLRO carries out for the Firm.

[Insert text here]



**L4** Provide the names, designations and departments of any individuals in the firm who were appointed as Deputy MLRO during the year in question. *AML Rule 12.1.3*

[Insert text here]

## M AML Training and Awareness

**M1** Summarize the topics covered, frequency and delivery method<sup>2</sup> of AML training that the Firm provided to its relevant Employees for the year in question. *AML Rule 13.1.1*

[Insert text here]

**M2** Indicate the number of relevant Employees that have received AML training for the year in question, broken down by positions held in the Firm (e.g. Board of Directors, management, non-management staff).

[Insert text here]

**M3** Indicate the number of relevant Employees that have not received AML training for the year in question, broken down by positions held in the Firm (e.g. Board of Directors, management, non-management staff), and provide an explanation for this.

[Insert text here]

## N Suspicious Activity Reports

**N1** Describe the Firm's policies, procedures, systems and controls to monitor and detect suspicious activity or transactions in relation to potential money laundering or terrorist financing. *AML Rule 14.2.1*

[Insert text here]

<sup>2</sup> Delivery methods to provide AML training may include classroom sessions, online training, tests, etc.





**N2** How many **Internal** Suspicious Activity Reports did the Firm have during the year in question? Of these, how many were then submitted as **External** Suspicious Activity Reports to the AMLSCU?

[AML Rule 14.2.2]

[Insert text here]

## O Declaration

1. I declare that, to the best of my knowledge and belief, having made due enquiry, the information given in this form, as well as any applicable supporting documents, is complete and correct. I understand that it is an offence under ADGM's Financial Services and Markets Regulations, Article 219 – *Misleading the Regulator* to knowingly or recklessly provide to the ADGM FSRA any information which is false, misleading, or deceptive or to conceal information where the concealment of such information is likely to mislead or deceive the ADGM FSRA.
2. I confirm that I have the authority to complete this form, to declare as specified above and sign this form for, or on behalf of, the Firm.
3. I understand that any personal data provided to the ADGM FSRA will be used to discharge its regulatory functions under the Abu Dhabi Law No. 4 of 2013 and other relevant legislation and may be disclosed to third parties for those purposes.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date:

Name of the above signed individual:

[Insert text here]

Position or title:

[Insert text here]