

Purpose

This worksheet is provided as an aid to reflect upon the processes that your organisation uses and what you can do to make your AML/CTF program more effective.

Directions

Consider the questions below that relate to employee due diligence. Detail any observations or deficiencies that may lead to modifications of your AML/CTF program.

1. What policies and procedures do you have in place to screen or vet new staff when they commence employment with your organisation?

2. Which positions within your organisation have you identified as susceptible to facilitating ML/TF (for example, if an employee occupying the position were to be approached with a bribe)?

3. What procedures do you have to reassess an employee if they move into a position that has a higher ML/TF risk than the one which the employee previously occupied?

4. What measures do you have in place for an employee who does not comply with AML/CTF program procedures?