





SUSPICIOUS MATTER REPORTING: CHECKLIST

Have you noticed something suspicious or a suspicious activity? Have you conducted enhanced customer due diligence checks to determine if you have reasonable grounds for your suspicion? Have you included all the reasons for your suspicion, including potential indicators (or red flags), in a clear and readable format? Have you written your grounds for suspicion in plain English, using subheadings where appropriate? Have you answered the six essential key elements in your grounds for suspicion? The who, what, where, when, why and how? Have you referred to crime types and keywords to help you best describe the suspicious activity? Have you included all the relevant know your customer (KYC) and transactional information about the people connected to the suspicious activity in the appropriate fields and sections? Submit your SMR within the required timeframes i.e. within 24 hours if your suspicion is related to terrorism financing and 3 business days for money laundering and other offences.

