



Enhanced Due Diligence Questionnaire

Company Name:
Address:

If you answer “no” to any question, additional information can be supplied at the end of the questionnaire. For policy and procedure details please also attach copies of relevant documents.

I. General AML Policies and Procedures	Yes	No
Is the AML compliance program approved by the firm’s board or a senior committee?		
Please provide details of the AML and prevention of financial crime policy:		
Does the firm have a legal and regulatory compliance program that includes a designated compliance officer (such as an MLRO) that is responsible for coordinating and overseeing the AML framework?		
If yes, name and contact details of designated compliance officer:		
Has the designated compliance officer/MLRO/Senior Manager/other officers done their Fit and Proper test (if applicable)?		
If so, who has done their Fit and Proper test:		
How many individuals are dedicated to compliance and regulatory functions?		
Does the firm have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates?		
Does the firm have record keeping procedures that comply with applicable regulations?		
Are the firm’s AML policies and practices being applied to all branches and subsidiaries of the firm both in the home country and in locations outside of that jurisdiction?		
II. Audits	Yes	No
Does the firm have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
Has the firm or associated company had any external AML audits performed? (please provide latest external audit report)		
Has the firm or associated company been audited by the HMRC or other relevant Tax authority? If so, what were the results?		



III. Risk Assessment		Yes	No
Does the firm have a risk-based assessment of its customer base and their transactions?			
Please provide details and a copy of your AML risk assessment Policy:			
Does the firm determine the appropriate level of enhanced due diligence necessary for categories of customers and transactions that the firm has reason to believe pose a heightened risk of illicit activities or financial crime?			
IV. Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes	No
Has the firm implemented customer identification procedures for the identification of those customers on whose behalf it maintains or operates			
Does the firm collect information regarding its customers' business activities?			
Does the firm have a process to review and, where appropriate, update customer information relating to high risk client information? *Please provide your KYC Policy			
Does the firm have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer'			
Does the firm complete a risk-based assessment to understand the normal and expected transactions of its customers?			
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		Yes	No
Has the firm developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?			
Does the firm screen customers and transactions against watch and sanction lists of persons, entities or countries issued by governments and other authorities?			
If so please provide details of how matches are identified and what follow-up action is taken:			
Has the firm previously experienced cases of fraud and/or financial crime?			
If "Yes" what action was taken?			
Have you ever reported suspicious transactions to the NCA, FNTT or any other national FIU or Crime Agency?			
If "Yes" please indicate numbers and details (types of action)?			
VI. Transaction Monitoring		Yes	No
Does the firm have a monitoring program for unusual and potentially suspicious activity?			
Please provide details of the firm's policy and procedures for monitoring transactional activity undertaken by clients:			



VII. AML Training	Yes	No
Does the firm provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the firm's products and services. 		
Does the firm keep records of its training sessions including attendance records and relevant training materials used?		
Does the firm communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
Does the firm employ third parties to carry out some of the functions of the firm?		
If the answer to the above question is yes, does the firm provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the firm's products and services. 		
VIII. Data Protection	Yes	No
Does the firm hold client data in the European Union?		
<ul style="list-style-type: none"> ▪ please detail how and where this is held ▪ please provide details of your data security procedures ▪ please provide copy of your data 		
Please provide details of your company's data protection policy and privacy policy:		
Please provide details of the Company's registration details at the Information Commissioners or the State Data Protection Inspectorate or other relevant agency if applicable:		

Space for additional information (*Please indicate which question the information is referring to*):

****Please explain here if you are unable to or do not need to provide an AML and KYC Policy**



Form completed on behalf of:
Name:
Title:
Signature:
Date:

Email this completed form to: sales@canpay.ae

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