

1. GOVERNANCE AND SCOPE

- ☐ Current TCSP licence and complete service inventory
- ☐ Organisation chart, senior management, CO and MLRO appointments
- ☐ Approved institutional ML/TF risk assessment and update record
- ☐ Current AML/CFT policy, procedures, version and approval
- ☐ Prior audit, inspection and remediation records
- ☐ Review entity, period, business lines and exclusions confirmed

3. CUSTOMER FILE EVIDENCE

- ☐ Customer and beneficial-owner identification and verification
- ☐ Ownership and control structure supported by evidence
- ☐ Persons acting for the customer and authority verified
- ☐ Purpose and intended nature of the relationship recorded
- ☐ Customer risk assessment, rationale, approval and review history
- ☐ PEP, sanctions and other screening results and dispositions
- ☐ EDD, source-of-wealth/source-of-funds and approvals where required
- ☐ Ongoing CDD, trigger reviews, monitoring and exit records

2. POPULATION AND SAMPLE READINESS

- ☐ Complete active customer population with service and risk fields
- ☐ High-risk, PEP, remote and complex-ownership cases identifiable
- ☐ New, long-standing, overdue and terminated relationships identifiable
- ☐ Trust, nominee, director and cross-border cases identifiable
- ☐ Population totals reconcile to operational records
- ☐ Sample transfer manifest and authorised contact prepared

4. CENTRAL CONTROL EVIDENCE

- ☐ Risk distribution, periodic-review and overdue-review reports
- ☐ PEP, sanctions, EDD and exception registers
- ☐ Internal unusual-activity and MLRO decision records
- ☐ STR governance and post-report controls, with restricted access
- ☐ Training content, attendance and effectiveness evidence
- ☐ Outsourcing, reliance, access and record-retention controls
- ☐ Management reporting, action owners and closure evidence

SECURE TRANSFER AND FINAL READINESS

- Agree scope, authorised contacts, secure transfer, access, retention and deletion before sending customer records.
- Do not send every file at the outset. Use a controlled, risk-based sample and keep a transfer manifest.
- Record missing evidence honestly. A policy or blank form does not prove that a control operates in practice.
- Restrict STR and internal suspicion records appropriately and agree how sensitive evidence will be reviewed.

MANAGEMENT NOTES, MISSING ITEMS AND ACTION OWNERS