



SAMPLE: TABLE OF CONTENTS

1.	INTRODUCTION.....	1
1.1	Policy Statement /Purpose of Compliance Programme.....	1
1.2	Overview of Money Laundering	1
1.3	Offences & Penalties.....	2
2.	LEGISLATIVE FRAMEWORK	
3.	RISK BASED APPROACH	
4.	CUSTOMER DUE DILIGENCE	
4.1	Customer Due Diligence Measures	
4.2	Individual Requirements	
4.3	Corporate Entities	
4.3.1	Private Companies	
4.3.2	Trust Requirements	
4.4	Ongoing Monitoring	
4.5	Foreign Transactions	
4.6	Enhanced Due Diligence (EDD) Measures	
4.7	Non face-to-face business relationships	
4.8	Introducers	
5.	INTERNAL CONTROLS	
5.1	Designation of a Compliance Officer	
5.1.1	Appointment of the Compliance Officer	
5.1.2	Profile of Compliance Officer	
5.1.3	Responsibilities of the Compliance Officer	
5.1.4	Suspicious Transaction/ Activity Reporting	
5.1.5	Decision Making Process	
5.2	Suspicious Transactions/ Activities	
5.2.1	Overview of Reporting suspicions/activities to the FIU	
5.2.2	Internal Suspicious Transactions Reporting	
5.2.3	External Suspicious Transactions Report	
6.	RECORD KEEPING REQUIREMENTS	
7.	TRAINING & STAFF RECRUITMENT	
7.1	Staff Training	
7.2	New Employees	
7.3	Annual Training	
8.	REVIEW OF COMPLIANCE PROGRAMME	
8.1	Period of review	
8.2	Independent Internal Audit Review	
8.3	External Auditor Review	
9.	APPENDICES	