**RMCP CHECKLIST**

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| **No** | **Description** |  |
| 1 | Organogram |  |
|  | * 1. Is there an Organogram in the RMCP? |  |
|  | * 1. Does the RMCP contain the titles, full names and surnames of all the members of the organisation? |  |
|  | * 1. Does the RMCP contain all members of the organisation? |  |
| 2 | FIC Registration Confirmation |  |
|  | 2.1. Does the RMCP contain proof of registration with the FIC? |  |
|  | 2.2. Is the Org ID visible? |  |
|  | 2.3. Is the date of registration visible? |  |
| 3 | Letter of Acceptance of RMCP signed by Top Management |  |
|  | 3.1. Does the RMCP contain a letter / clause where top management has approved the RMCP? |  |
|  | 3.2. Has all directors and top management signed and accepted the RMCP? |  |
|  | 3.3. Has the Directors signed for the approval of the RMCP? |  |
| 4 | FIC Officer Appointment Letter |  |
|  | 4.1. Does the RMCP contain a FIC Officer appointment letter? |  |
|  | 4.2. Is the FIC Officer a logical choice for a FIC Officer? |  |
| 5 | Order of Decision-making regarding Risk Management |  |
|  | 5.1. Does the RMCP contain the decision-making order for FIC matters? |  |
|  | 5.2. Does the letter contain sufficient details of all members in the order? |  |
| 6 | What is Risk and how do we rate it? |  |
|  | 6.1. Does the RMCP contain a section about how the firm defines risk? |  |
|  | 6.2. Does the RMCP contain a risk assessment on the business level? |  |
|  | 6.3. Does the RMCP contain a risk assessment on all products and services? |  |
|  | 6.4. Does the RMCP contain a risk assessment on the client-level? |  |
| 7 | How we Identify who prospective clients are |  |
|  | 7.1. Does the RMCP contain how the firm defines a Prospective Client? |  |
|  | 7.2. Does the RMCP contain how the firm identifies a Prospective Client? |  |
| 8 | How we handle Section 21A of the FIC Act, above and below the threshold |  |
|  | 8.1. Does the RMCP contain the current transaction thresholds as specified by FIC? |  |
|  | 8.2. Does the RMCP contain the procedure to be followed if a transaction exceeds the thresholds? |  |
| 9 | How we identify and verify clients and how is it intensified / loosened for risk levels |  |
|  | 9.1. Does the RMCP define a natural person? |  |
|  | 9.2. Does the RMCP explain the full FIC procedure for natural persons? |  |
|  | 9.3. Does the RMCP explain how low and high-risk Natural persons are handled? |  |
| 10 | How we identify legal persons, including Trusts and Partnerships, and how beneficial Ownership is determined |  |
|  | 10.1. Does the RMCP define all legal persons? |  |
|  | 10.2. Does the RMCP explain the full FIC procedure for legal persons? |  |
|  | 10.3. Does the RMCP explain how low and high-risk legal persons are handled? |  |
|  | 10.4. Does the RMCP explain how beneficial ownership is determined for all legal persons? |  |
| 11 | Describe the Timing of verification of clients, sequence of attempts of Customer Due Diligence, when it is decided CDD cannot take place, and how the Business Relationship will be terminated |  |
|  | 11.1. Does the RMCP describe WHEN CDD documents are requested? |  |
|  | 11.2. Does the RMCP describe when CDD should be completed for every type of transaction? |  |
|  | 11.3. Does the RMCP describe WHEN it is decided that CDD cannot take place? |  |
|  | 11.4. Does the RMCP describe how the business relationship will be determined when CDD cannot take place? |  |
|  | 11.5. Does the RMCP describe how the firm ensures they do not do business with anonymous for fictitious clients? |  |
| 12 | What to do if you have doubts about the veracity of previously obtained Information |  |
|  | 12.1. Does the RMCP describe the process used by the firm when they have doubts about the veracity of previously obtained information? |  |
|  | 12.2. Does the RMCP outline which steps in the CDD process will be repeated in such cases? |  |
|  | 12.3. Does the RMCP outline additional verification steps in such cases? |  |
| 13 | Describe the manner and type of information gathered in terms of Sec 21a of Fic Act |  |
|  | 13.1. Does the RMCP describe where in the contract documents for a transaction / business relationship the nature of the business relationship concerned is described? |  |
|  | 13.2. Does the RMCP describe where in the contract documents for a transaction / business relationship the intended purpose of the business relationship concerned is described? |  |
|  | 13.3. Does the RMCP describe where in the contract documents for a transaction / business relationship the source of funds for the transaction is described? |  |
| 14 | What we consider as complex or unusually large transactions, and how records of these are kept |  |
|  | 14.1. Does the RMCP define what is considered as a complex or unusually large transaction? |  |
|  | 14.2. Does the RMCP describe the procedure followed when a transaction is complex or unusually large? |  |
|  | 14.3. Does the RMCP describe how records are kept of these types of transactions? |  |
| 15 | What we consider as suspicious or unusual transactions |  |
|  | 15.1. Does the RMCP define suspicious or unusual transactions? |  |
|  | 15.2. Does the RMCP describe the process followed for suspicious or unusual transactions? |  |
|  | 15.3. Does the RMCP describe the STR reporting procedure? |  |
| 16 | Reporting Obligation and Section 28, 29 and 32 Procedure |  |
|  | 16.1. Does the RMCP describe when reporting obligations arise? |  |
|  | 16.2. Does the RMCP describe your office’s reporting procedure? |  |
| 17 | A copy of Section 21 and 21B of the FIC Act |  |
|  | 17.1. Does the RMCP contain a copy of Section 21 and 21B of the FIC Act? |  |
| 18 | How FPEP’s and DPEP’s are handled |  |
|  | 18.1. Does the RMCP define FPEP’s, DPEP’s and DPIP’s? |  |
|  | 18.2. Does the RCMP describe the procedure for identification of these groups? |  |
|  | 18.3. Does the RMCP describe additional CDD procedures for these groups of people? |  |
| 19 | Targeted Financial Sanctions List Procedure |  |
|  | 19.1. Does the RMCP define what the TFS list is? |  |
|  | 19.2. Does the RMCP describe how clients are screened against this list? |  |
|  | 19.3. Does the RMCP describe how reports are made for clients present on this list? |  |
|  | 19.4. Does the RMCP describe the procedure for handling clients who are present on this list? |  |
| 20 | Proliferation Activities and Weapons of Mass Destruction |  |
|  | 20.1. Does the RMCP define PF/WMD financing? |  |
|  | 20.2. Does the RMCP explain the risk rating methodology for PF? |  |
|  | 20.3. Does the RMCP describe the reporting procedure for these types of cases? |  |
| 21 | The Company’s Record Management Process |  |
|  | 21.1. Does the RMCP describe how FIC documents are collected from clients, and the people involved in this process within the organisation? |  |
|  | 21.2. Does the RMCP describe how FIC documents are collected from estate agents in the employ of the company, and the people involved in this process within the organisation? |  |
|  | 21.3. Does the RMCP describe who does quality control on FIC Documents, and verification, and who is responsible for getting the corrected documents from clients? |  |
|  | 21.4. Does the RMCP describe how and where records are kept for all transactions? |  |
|  | 21.5. Does the RMCP describe what type of records are kept for all transactions? |  |
| 22 | Section 42 FIC Act |  |
|  | 22.1. Does the RMCP indicate which clauses of Section 42 is applicable, and which not, and is there explanations on the N/A sections? |  |
| 23 | Employee Screening |  |
|  | 23.1. Does the RMCP describe the Employee screening procedure? |  |
|  | 23.2. Does the RMCP identify persons responsible for employee screening? |  |
|  | 23.3. Does the RMCP include risk assessments for all job descriptions employed by the firm? |  |
| 24 | FICA training Slides / notes |  |
|  | 24.1. Does the RMCP contain evidence of FIC Training on a regular basis? |  |
| 25 | Acknowledgement of FIC training attendance by all staff members and agents |  |
|  | 25.1. Does the RMCP contain evidence that employees of the firm has attended FIC Training regularly? |  |
| 26 | Contract document templates used by Firm |  |
|  | 26.1. Does the RMCP contain all template contract and supporting documents for all types of transactions? |  |