



FINANCIAL INTELLIGENCE AUTHORITY

ANNUAL COMPLIANCE REPORTING TEMPLATE FOR ACCOUNTABLE PERSONS

Pursuant to Regulation 45 Anti-Money Laundering Regulations, 2015.

Name of Accountable person: _____

FIA Registration Code: _____

Reporting Year: _____

Instructions:

1. Please complete the form below by entering one of **C**, **D**, or **NA** in column 5 for each of the rows. Where a regulation has not been complied with, enter reason for non-compliance in column 6 of the respective row. You may use additional sheets if the explanation is lengthy.
2. Print, sign, stamp and send the document in a **PDF** file to the FIA offices.
3. Email the **word Document** as attachment to **compliance@fia.go.ug** with email subject being similar to the file names for example **ACR/2019/ Name of Accountable person**

Signature and Stamp (Accountable person) _____

No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
1.	4. Registration with the FIA	4. (1)	The accountable person registered with the FIA within one year of the Regulations or such other period as the Authority may specify.			
2.	Money Laundering control Officer	6. (1)	The accountable person has appointed a money laundering control officer.			
3.		6.(2)	The Accountable person notified the Authority of the appointment or designation of a money laundering control officer using Form 3 in the Schedule.			
4.		6. (3)	The money laundering control officer is of senior management level and has relevant and necessary competence, authority and independence.			
5.		6. (4)	The Money Laundering control Officer is not an Internal Auditor or the Chief Executive except in the circumstances where the Chief Executive is a sole proprietor.			

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6.		7. (2)	All staff in the institution monitored and reported to the money laundering control officer any suspicious activity on money laundering.			
7.			The money laundering control officer reported forthwith to the FIA any transaction or activity that he had reason to believe was suspicious in the form prescribed in the Schedule.			
8.			The money laundering control officer ensured that officers and employees of the institution were made aware of the Act as well as the audit systems adopted by the institution.			
9.			The money laundering control officer in liaison with the institution's human resource department ensured that persons were screened before being hired as employees.			

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10.	6. Risk Assessment	8. (1)	The institution has undertaken a Money Laundering Risk Assessment to enable it identify, assess, monitor, manage and mitigate the risks associated with money laundering and terrorism financing, taking into account all relevant risk factors.			
11.		8. (2)	The Accountable person has documented the results of the risk assessment carried out and made the results of the risk assessment available to any competent authority upon request.			
12.		8.(3)	The accountable person within forty eight hours after conducting a risk assessment, has given a copy of the risk assessment results to the Authority.			
13.		8.(4)	In undertaking the risk assessment, the accountable person has developed and implemented systems that enable it identify and assess money laundering risks consistent with the nature and size of the institution and the outcome of such assessment is documented.			

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14.		8.(5)	On the basis of the results of the assessment, the accountable person has developed and implemented Board approved policies, controls and procedures that enable it to effectively manage and mitigate the identified risks.			
15.		8.(6)	The accountable person has put in place procedures and mechanisms for monitoring the implementation of policies, controls and procedures to address the risks relating to money laundering and terrorism financing, and where necessary, enhance them on a regular basis.			
16.		8.(7)	The institution has put in place mechanisms to update its risk assessment policies or programs regularly taking into account changes such as the entry of the institution into new markets and the introduction of new products and services.			
17.	New Technologies	9. (1)	The accountable person has taken reasonable measures to prevent the use of new technologies for money laundering purposes.			

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18.		9. (2)	The accountable person has put in place measures to ensure carrying out of money laundering risk assessment prior to the introduction of a new product, new business practice or new technology for both new and pre-existing products			
19.		9. (3)	The accountable person has put in place measures to ensure outcome of money laundering risk assessment is documented and the documentation available to the authority within forty eight hours after conducting the risk assessment.			
20.	Internal Control Obligations	11. (1)	The accountable person has formulated, adopted and implemented internal control measures and other procedures to combat money laundering and terrorist financing. The measures shall include—			
21.		11. (2) a	<ul style="list-style-type: none"> monitoring systems for complex, unusual or large transactions or suspicious activities 			

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22.		11. (2) b	<ul style="list-style-type: none"> enhanced due diligence procedures with respect to persons and business relations and transactions carrying high risk 			
23.		11. (2)c	<ul style="list-style-type: none"> monitoring systems for persons in jurisdictions that do not have adequate systems to combat money laundering or terrorism financing 			
24.		11. (2)d	<ul style="list-style-type: none"> training programs for the purposes of continuous training of employees, managers and directors of the accountable person 			
25.		11. (2)e	<ul style="list-style-type: none"> awareness programs for the purposes of ensuring that employees, managers and directors of the accountable person are sufficiently knowledgeable 			

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26.		11. (2)f	<ul style="list-style-type: none"> • maintenance of a manual to facilitate compliance with procedures, processes and working methods relating to anti money laundering 			
27.		11. (2)g	<ul style="list-style-type: none"> • Systems relating to carrying out of independent audits to review and verify compliance with and effectiveness of the measures. 			
28.		11. (2)h	<ul style="list-style-type: none"> • Mechanisms for the sharing of information obtained by an accountable person with other accountable persons including systems that ensure the confidentiality of the shared information. 			
29.	Anonymous or Fictitious Accounts	12. (1)a	The accountable person did not open or maintain an anonymous or fictitious account.			

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30.		12. (1)b	The accountable person did not knowingly establish or maintain a business relationship or conduct any transaction with a customer who was entering into a business relationship or conducting any transaction under a false name.			
31.		12. (2)	The accountable person, at the time of establishing a business relationship, took reasonable measures to determine whether the applicant for business was acting on his own behalf or on behalf of a third party.			
32.		12. (3)a,b	In determining what constitutes reasonable measures for the purpose of regulation 12 (2), all the circumstances of the case were taken into account and in particular, regard was given to any guideline or policies applicable to the accountable person and, in the absence of any guideline or policies, to best practice which, for the time, was followed in the relevant field of business and which was applicable to those circumstances.			

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33.	Due Diligence	14. (1)	For the purposes of section 6 of the Act, the accountable person carried out due diligence in the circumstances listed in Reg.14(1)			
34.		14. (2)	The accountable person, on the commencement of these Regulations, carried out due diligence on all accounts and customers' existing immediately before the commencement of the Regulations.			
35.	Due diligence to be carried out on risk based approach	15.(1)	The accountable person carried out due diligence in respect of all persons and customers on a risk sensitive basis, taking into account the outcome of the risk assessment undertaken by the accountable person under these Regulations			
36.		15.(2)	Where an identified risk was high, the accountable person conducted enhanced due diligence measures consistent with the risk identified.			
37.		15.(3)	The Enhanced due diligence measures listed in Reg.15.(3) were applied			

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38.		15.(4)	The enhanced due diligence measures referred to in Reg.15. (2), were applied at each stage of the customer due diligence process and continue to be applied on an on-going basis			
39.		15.(5)	Where the risk identified by the accountable person was low, the accountable person had the discretion to conduct simplified due diligence measures but this did not apply to cases involving suspicions of money laundering or terrorism financing.			
40.	Performance of due diligence by third party.	16.(2)	The accountable person who wished to rely on a third party entered into an agreement with the third party and the agreement outlined the responsibilities of the accountable person and the third party			

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41.		16.(3) a,b	The accountable person who relied on a third party obtained from the third party all the necessary information concerning the relevant elements of customer due diligence measures performed by the third person including copies of identification data and other relevant documentation; ensured that the third party was regulated, supervised or monitored by a competent authority and had measures in place to comply with customer due diligence and record-keeping requirements in accordance with the Act and these Regulations.			
42.		16.(4)	Where the accountable person intended to rely on a third party that is based outside Uganda, the accountable person assessed the anti -money laundering and combating terrorism financing risks that the country of the third party posed and the adequacy of customer due diligence measures adopted by financial institutions in that country.			

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43.		16.(6)	Where the accountable person relied on a third party to perform some due diligence measures, the responsibility for customer due diligence measures remained with the accountable person that was relying on the third party			
44.	Compliance with due diligence measures	17.	The accountable person, as soon as was reasonably practicable after commencement of these Regulations, complied with the due diligence requirements set out in these Regulations			
45.	Accountable person to identify person before establishing relationship	18.(1)	The accountable person verified the identity of a person in the circumstances listed in Reg.18(1)			
46.		18.(2)	In addition to verifying the identity of a person or customer under Reg.18 (1), the accountable person verified the matters listed in Reg.18(2)			

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47.		18.(3)	Where a person or customer failed or did not, as soon as was reasonably practicable, provide sufficient proof of identity, the accountable person did not open an account, perform any transaction or commence any business relationship with the person or customer, and in a case where a business relationship already existed with the person or customer, the accountable person discontinued the business relationship.			
48.		18.(4)	The accountable person, on a regular basis, reviews the due diligence measures relating to identification information, records and documents of all existing customers in order to ensure that the information, records and documents are up to date.			
49.	Establishing the identity of natural persons who are citizens or residents	19. (1)	For the purposes of establishing or verifying the identity of a natural person who is a citizen or a natural person lawfully resident in Uganda, the accountable person required the items listed in Reg.19(1)			

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50.		19. (2)	The accountable person required a person to provide the additional information listed in reg.19(2) to enable the identification and verification of the identity of the person			
51.		19.(3)	Where in any case -(a) the identity of a citizen was in doubt, the accountable person requested the National Identification and Registration Authority to confirm the identity of the person;(b) the immigration status of a person was in doubt, the accountable person requested the Uganda Citizenship and Immigration Control Board to confirm the immigration status of the person			
52.		19.(4)	Where a person was only capable of establishing a business relationship or concluding a transaction with the assistance of a third person, the accountable person obtained the particulars of the third person.			

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53.		19.(5)	The particulars obtained from the third person under Reg.19 (4), with the necessary modifications, were the same as those of the person intending to establish a business relationship or conclude a transaction.			
54.		19.(7)	The procedure outlined in Reg.19(7) was adopted in respect of taking finger prints			
55.	Establishing the identity of foreign nationals	20.(1)	The accountable person obtained from, or in respect of, an individual who is a foreign citizen and is not resident in Uganda, the information listed in Reg.20(1)			
56.		20.(2)	Where a person was only capable of establishing a business relationship or concluding a transaction with the assistance of a third person, the accountable person obtained the particulars of the third person.			

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57.		20.(3)	The particulars obtained from the third person, were with the necessary modifications, the same as those of the person intending to establish a business relationship or conclude a transaction under these Regulations.			
58.		20.(4)	The accountable person independently verified the particulars and details submitted by a foreign national by requesting-(a) the Uganda Citizenship and Immigration Control Board to confirm the information, in the case of matters relating to the person's immigration status; or (b) the individual's bank in his or her country of origin or residence to confirm the bank and financial details.			

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59.		20.(5)	Where it was not practicable to contact the individual's bank in his or her country of origin or residence, the accountable person used any other information obtained from any other independent and reliable source, while taking into account the risk posed by the jurisdiction of origin or residence of the foreign national, the nature of business of the foreign national and products and services offered by the accountable person to the foreign national.			
60.	Establishing identity of local entities and other bodies	21.(1)	For the purposes of establishing and verifying the identity of a local entity or body, the accountable person required the entity or body to provide the information listed in Reg.21(1)			
61.		21.(2)	The accountable person verified the information obtained from a local legal entity or body other than a legal arrangement by complying to Reg.21(2)			

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62.		21.(3)	Where it was not practicable to verify the particulars of a legal entity or body in the manner described in Reg.21 (2), the accountable person used any other information obtained from any other independent and reliable source, while taking into account the risk posed by the nature and business of the legal entity and the products and services offered to the legal entity or body by the accountable person.			
63.	Establishing identity of foreign entities or bodies	22.(1)	For the purposes of establishing and verifying the identity of a foreign entity or body, the accountable person required the entity or body to provide the information listed in Reg.22(1)			
64.		22.(2)	In addition to the information required under Reg.22 (1),the accountable person collected information about the foreign entity or body to establish items listed in Reg.22(2)			
65.		22.(3)	The accountable person verified the particulars obtained in respect of a foreign company by following Reg.22(3)			

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66.	Establishing identity of partnerships	23	For the purposes of establishing and verifying the identity of a partnership, the accountable person required the information listed in Reg.23			
67.	Establishing identity of trustees	24.(1)	For the purposes of establishing and verifying the identity of a trust, the accountable person required the information listed in Reg.24(1)			
68.		24.(2)	The accountable person verified the particulars submitted to the accountable person by a legal arrangement by adhering to Reg.24(2)			
69.		24.(3)	Where the customer was a private trust, the accountable person verified the authorization given to each trustee of the trust			
70.	Identification of beneficiaries in a legal person or legal arrangement	25.(1)	The accountable person developed and implemented due diligence measures to enable the accountable person to identify and verify the natural persons exercising control and ownership of a legal person or legal arrangement other than a trust.			

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71.		25.(2)	For the purposes of Reg.25, the due diligence measures outlined in Reg.25(2) were adopted by the accountable person			
72.	Identification of beneficiaries in life insurance related business	26.(1)	In the case of life or other investment related insurance business, the accountable person, in addition to the customer due diligence measures required, ensured that the beneficiary of the life or other investment related insurance business is capable of being identified			
73.		26.(2)	The accountable person took reasonable measures to determine whether the beneficiary of a life insurance policy is a politically exposed person, in any case the identification was done before the proceeds were paid.			
74.		26.(3)	where the payee of the insurance policy was not a customer, an insurer identified the payee and verified his or her identity before making any of the payments listed in Reg.26(3)			

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75.		26.(5)	Where there was a high risk identified, the accountable person in addition to the required customer due diligence measures did what was outlined in Reg.26(5)			
76.	Establishing authority of person acting for another	27.(1)	Without prejudice to any regulation, where an individual sought to establish a relationship or to conclude a transaction with the accountable person on behalf of another person, partnership, trust or legal arrangement, the accountable person, in addition to the information required under these Regulations, required the person to provide proof of that person's authority to act in that capacity on behalf of the person, partnership, trust or legal arrangement			
77.		27.(2)	The accountable person verified the information obtained under Reg.27 (1), by comparing the particulars of the individual or legal person, partnership or trust with information obtained by the accountable person.			

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78.	Life insurance related business	28. (1)	For life or other investment-related insurance business, the accountable person, in addition to the customer due diligence measures required for the customer and the beneficial owner, conducted additional customer due diligence measures on the beneficiaries of life insurance and other investment related insurance policies, as soon as the beneficiary or beneficiaries were identified or designated as described in regulation 20 (1) of the Regulations.			
79.		28. (2)	The information collected under regulation 20 (1) was recorded and is maintained in accordance with the provisions of the Act and Regulations.			
80.	Compliance	28. (1)	The accountable person as soon as was reasonably practical, complied with the obligation under regulation 12(2), after it had entered into a business relationship with an applicant for business as described in regulation 21 (1).			

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81.	R. 29 Politically exposed person		The accountable person implemented appropriate risk management systems to determine whether a person is politically exposed person			
82.		29(2a)	The accountable person obtained written approval from senior management to transact a business relationship with that person			
83.		29(2b)	The accountable person took adequate measures to establish the source of wealth and the source of funds involved in the proposed business relationship or transaction, obtain information from close family members who have transaction authority over the account.			
84.		29(2d)	The accountable person gathered information to determine the purpose of the transaction or account and the expected volume of volume and nature of account activity			
85.		29(2e)	The accountable person reviewed public sources of information on politically exposed person (avail documentation on identified politically exposed person where reference was made to public sources?)			

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86.		29(2f)	The accountable person conducted ongoing monitoring of business relationship once the account has been established. (Documentation on ongoing due diligence conducted.			
87.	R.30 Measures undertaken by Foreign branches and subsidiaries		The accountable person ensured that its foreign branch or subsidiary apply due diligence measures and other measure relating to anti money laundering and combating of terrorism financing			
88.			The accountable person implemented additional measure as appropriate where the laws of the host country do not permit proper implementation Does The accountable person inform the supervisory authority under such circumstances			
89.			The accountable person notified its supervisory authority in writing where the foreign branch or subsidiary is unable to implement due diligence and other measures relating to anti money laundering and combating of terrorism financing.			

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90.	R.31 Correspon dent Financial relationships	31(a)	The accountable person obtained sufficient information about correspondent financial institution relating to its nature of business			
91.		31(b)	The accountable person tried to assess the reputation of the correspondent financial institution from the available information and its quality of supervision			
92.		31(c)	The accountable person tried to determine the quality of anti-money laundering and combating of terrorism financing regulation in the correspondent financial institution 's jurisdiction or country of domicile			
93.		31(d)	The accountable person assessed the correspondent financial institutions anti money laundering and combating of terrorism financing controls			
94.		31(e)	The accountable person obtained written approval from the central bank before establishing a new correspondent financial institution relationship			
95.		31(f)	The correspondent financial institution verified the identity of its customers and conducted on going monitoring of relationships			

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96.		31(g)	The accountable person verified the ownership and management structures of the correspondent financial institution including whether or not the politically exposed persons has ownership or control of the financial institution.			
97.	R.32 Customer acceptance policy		The accountable person developed and updates on a regular basis a written risk based customer acceptance policy for ongoing business relationships or single transactions			
98.			The accountable person has put in place policies and guidelines to explain the customer acceptance policy which forms part of training program of the accountable person			
99.	R.33 Money transfer value services	33(1a)	The accountable person has ensured that the money value transfer agents are licensed.			
100.		33(1b)	The money transfer agents have in place anti money laundering and combating of terrorism financing policies and systems			

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101.		33(1c)	The money transfer agents have implemented effective systems to monitor and ensure compliance with anti-money laundering and combating terrorism financing policies and such systems are regularly updated			
102.	R.34 Wire transfers	34(a)	The accountable person ensured that the information accompanying domestic or cross border wire transfers include complete originator information such as the name, address account number of the originator and other related information.			
103.		34(c)	Complete beneficiary information such as the name of the beneficiary, address of the beneficiary , account number of the beneficiary , the society for worldwide International Financial Telecommunication (SWIFT) code			
104.		34(d)	The financial institution obtained information on beneficiary's account number in absence of the number the beneficiary's transaction reference number			
105.		34(3)	The Financial institution verified the identity of the originator and beneficiary			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
106.		34(4)	The financial institution ensured that the intermediary institution in the payment chain provided originator.			
107.		34(5)	The financial institution reports and monitors electronic transfers which do not contain complete originator information and beneficiary.			
108.		34(5)	The financial institution terminated business relationships with a person who persistently fails to include originator and beneficiary information			
109.	R.35 Wire transfers by prohibited persons	35(1)	The financial institution freezes wire transfers , or accounts relating to persons or entity designated by United Nations Security council relating to combating of terrorism or terrorism financing			
110.			The financial institution has notified the Authority on such actions.			
111.	R.36 Continuous monitoring of transactions	36(1)	The financial institution continually monitors the business or account activity and transactions of customers on a continuous basis			
112.		36(2)	The financial institution continuously monitors the business, or account activity on a risk sensitive basis			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
113.		36(3)	The financial institution continuously conducts due diligence on its customers and developed risk based systems and procedures			
114.	R.37 Monitoring of numbered accounts		The financial institution monitors transactions involving a numbered account and reports suspicious activity on any such account to the Authority.			
115.	R.38 Legitimacy of source of funds	38(1a)	The financial institution obtained a written statement from the customer in case of frequent or unusual cash deposits , confirming that the nature of his or her business normally and reasonably generates substantial amounts of cash			
116.		38(2b)	The financial institution in cases of frequent or unusual currency obtained written statement from the customer confirming the reason and need for the currency			
117.		38(2c)	The financial institution in cases of multiple or nominee accounts obtained a written statement from the customer confirming the reason and need for multiple or nominee accounts , or similar related transactions			

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118.		38(2d)	The financial institution in cases of large, frequent or unusual transfers or payments of funds obtained appropriate documentation to identify the recipient or sender of the transferred or paid funds and the reason for the transfer or payment			
119.		38(e)	The financial institution in cases of large or unusual investments, requests for advice or services obtained a written statement from customer confirming that investments or services requested for are bonfide and consistent with the objectives of the customers normal business			
120.	Reporting of suspicious activities and cash transactions	39.[1]	An accountable person upon investigating and being fully satisfied that the transaction or activity is suspicious, notified the Authority of any suspicious activity or transaction which indicated possible money laundering or terrorism financing.			
121.		39.[2]	The notification was made as soon as practicable but in any case not later than forty eight hours after the occurrence of suspicious activity or transaction, using form B in the schedule			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
122.		39.[3]	An accountable person filed reports to the Authority on all cash and monetary transactions equivalent to or exceeding one thousand currency points in any currency, whether or not the transaction appeared to be suspicious, using form A in the schedule.			
123.	Requirement of supervisory Authorities to report suspicious activities	40.[1]	The supervisory Authority reported to the Authority any suspicious transaction or activity that the supervisory Authority is aware of, with in forty eight hours of becoming aware of the activity.			
124.	Prohibition on tipping off	41[1.]	An accountable person, a director or employee of an accountable person, did not disclose to the person or customer the fact that a suspicious transaction or activity report or related information has been or is being submitted to the Authority or that a money laundering or terrorism financing investigation is being or has been carried out.			
125.		41.[2]	The limitation on disclosure above does not preclude disclosure or communication between directors and employees of the accountable person or advocates or competent Authorities.			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
126.	Record keeping	42.[1]	An accountable person kept and maintained records of all transactions for a minimum of ten years from the date the relevant business or transaction is complicated or following the termination of an account or business relationship.			
127.			An accountable person kept all records obtained through customer due diligence measures for the period of ten years.			
128.			Where a transaction involved a monetary instrument other than currency, the name of the drawer of the instrument, the name of the institution on which it was drawn, the name of the payee, if any, the amount and date of the instrument, the number of the instrument, if any, and details of any endorsement appearing on the instrument was recorded, and maintained.			
129.		42.[5]	An accountable person took reasonable steps, in respect of an existing business relationship, to maintain the correctness of records, particularly for higher risk categories of customers or business relationships.			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
130.						
131.		42.[7]	The accountable person ensured that any records kept under the Act and the regulations, may be made available to the competent Authority.			
132.	Independent audit	43[1.]	An accountable person carried out periodic independent audits and assessed its compliance with the requirements of the Act and these regulations			
133.		43.[2]	An accountable person prepared a report of every independent audit carried out and a copy of the report was, upon request, made available to the Authority			
134.	Annual compliance report	45.[1]	At the end of each calendar year, every accountable person submitted a compliance report to the Authority setting out the level of compliance with the Act, regulations, and the internal anti money laundering and combating terrorist financing policy of the accountable person			

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No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with and Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015)	Enter one of: C - Complied D - Did Not Comply NA - Not Applicable	If "Complied" state how. Use separate sheet(s) where necessary.	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
135.	Annual compliance report	45.[2]	The accountable person submitted the compliance report to the Authority by the thirty first day of January of the following calendar year or as was required by the Authority			

Annexures

DATA COLLECTION TOOL (For Accountable persons that maintain accounts for clients or customers)

The purpose of this section is to assist the FIA to understand the risks faced by accountable persons in relation to the money laundering and the financing of terrorism through their products, services, customers, delivery channels and geographic regions to which they are exposed.

Customer base

Type of Customers	Number of Customers
1. <i>Natural Persons</i>	
Resident	
Non-resident	

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Type of Customers	Number of Customers
Residents of “high-risk” jurisdictions as defined by the FATF, ESAAMLG and/or Uganda	
2. Legal person	
Resident	
Non-resident	
Residents of “high-risk” jurisdictions as defined by the FATF, ESAAMLG and/or Uganda	
3. Politically exposed persons (PEPs) and their related companies and affiliations	
Resident	
Non-resident	
4. Private (Elite) banking Customers	
Domestic	
Foreign	
5. Respondent banks holding accounts with the bank	
6. Money Remittance Companies (including agents)	
7. Forex Bureaus	
8. NGOs	
Domestic	
Foreign	
9. Real estate companies (including agents)	
10. Dealers in precious metals and stones and jewelry shops	
11. Casinos	
12. Diplomatic accounts	
13. Lawyers and Accountants	
14. Total Number of Customers	

CUSTOMER RISK PROFILE AS DETERMINED BY THE INSTITUTION BASED ON INTERNAL RISK ASSESSMENT

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Risk Profile	No. of Customers
1. Low Risk	
2. Medium Risk	
3. High Risk	
Total	

Products, Services offered

Description of Product/service offered	Risk profile

STR Reporting

SUSPICIOUS TRANSACTION REPORTS	
Number of Suspicious Transaction Reports Submitted to FIA	
Number of Unusual Transactions Identified but not yet assessed by Compliance Officer	
Number of Unusual/Suspicious Transactions not reported to FIA after assessment by Compliance Officer	

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AML/CFT Program Attachments

Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) documents

- Copy of the AML/CFT policy and procedures
- Copies of AML risk assessment of customers, products, methods of delivery and geographical location of customers (if any for 2019).
- Copy of the independent audit report of the compliance program (2019)

Declaration:

I hereby declare that the responses in this Annual Compliance Report are accurate and reflect the Institution's extent of compliance in the reported year with Anti-Money Laundering Act 2013 (as amended), and Anti-Money Laundering Regulations 2015.

Name: _____

Designation: _____

Signature: _____

Date: _____

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