



Eidgenössische Finanzmarktaufsicht FINMA
Autorité fédérale de surveillance des marchés financiers FINMA
Autorità federale di vigilanza sui mercati finanziari FINMA
Swiss Financial Market Supervisory Authority FINMA

Banks / securities dealers

Minimum AMLA audit requirements / data submission form

Audit firm

Contact at audit firm / lead auditor

Name of institution

Authorisation of institution

Is it an institution without client relationships subject to the AMLA in Switzerland?

Are there any specific reasons which, in consultation with the institution's Key Account Manager at FINMA, release the institution from completing the reporting form for the current audit period?

please select

please select

please select

If one of the above two questions has been answered with YES, only the "Master data" cover sheet needs to be completed.

Notes:

- The requirements for preparing the full regulatory audit report remain reserved.

The frequency and audit depth are defined in FINMA Circular 2013/3 "Auditing" (FINMA-Circ. 13/3). As a rule, a critical assessment must be carried out every year and an audit at least every three years.

Every year, the following must be assessed with audit depth "Audit":

- Identification of the contracting party of newly established business relationships since the last audit (Arts. 4-19 and 43-46 of the Agreement on the Swiss banks' Code of Conduct with regard to the Exercise of Due Diligence [CDB 16]);
 - Identification of the controller of newly established business relationships since the last audit (Arts. 20-26 and 43-46 CDB 16);
 - Identification of the beneficial owner of assets of newly established business relationships since the last audit (Arts. 27-42 and 43-46 CDB 16);
 - Business relationships with increased risks (in particular with politically exposed persons [PEPs]) for existing business relationships (Arts. 13-21 AMLO-FINMA); and
 - Transactions with increased risks for existing business relationships at banks/securities dealers that do **not** use an
- The information required in the Excel sheet "audit items" is based on the respective legal entity of the supervised institution. Foreign branches of a supervised institution do not have to be taken into account.
 - This document covers the minimum audit requirements set out in the AMLA (status as of 1 January 2016), AMLO-FINMA (status as of 1 January 2016) and CDB 16. In addition to this document, compliance with these standards must be documented in the full regulatory audit report (for the attention of FINMA) that also includes possible findings from other areas, namely with respect to Articles 1 para. 3, 47 ff. and 53 ff. CDB 16. This document also constitutes an informal data collection form for evaluating the effectiveness of the implementation of due diligence and organisational requirements defined in the AMLA for statistical purposes. The analysis of electronically submitted data collection forms makes it possible to keep aggregated statistics on the extent to which individual AMLA standards have been implemented throughout the financial sector, and therefore contributes significantly towards the supervision of anti-money laundering activities.
 - The term "private clients/individuals" refers to all individuals and domicile companies (vs. operating companies).
 - The term "internal guidelines" refers to all written internal instructions.
 - Every client's master account comprises a "file" or a "business relationship".

Procedure:

FINMA emails an **electronic version of this document** to an (previously agreed) internal unit of the audit firm, which then forwards it to the lead auditors for the institutions to be audited. The lead auditor must enter the following points in the electronic version:

- data relevant for supervisory purposes in line with the table provided below;
- **the audit depth applied per audit field** (unless already prescribed by FINMA, Audit = A, critical assessment = CA);
- explanatory comments on the audit items about which qualifications were made or about which a recommendation or comment without a qualification/recommendation were made.
- **The statistical data required per audit field** (The audit fields in which statistics must be entered are marked.):
 - quantity structure
 - random sample size (number of files)
 - population (number of files)
 - number of files with qualifications in the audit field, absolute and as a percentage
- The answer ("Yes/No" and "n/a" as applicable) to the questions about organisational or conceptual measures taken by the FI.

The lead auditor forwards the completed document electronically to the internal unit agreed with FINMA. This unit is provided with the access data to upload all the data collection forms completed by the audit firm to a FINMA database set up especially for this purpose. The deadline by which the data must be uploaded is communicated in writing to the audit firms every year.

Random samples

Only where audit depth "Audit" applies are random samples carried out. This is the case for all (sub)categories (e.g. PEPs [business relationship with increased risk], controllers). An appropriate number of random samples must be carried out in order to acquire reliable information about ensuring compliance with the regulatory provisions.

Qualifications and recommendations

The provisions on handling **qualifications and recommendations** are defined in Article 11 FINMA-AO.

Qualifications: Where the audit items in a particular section have not been met in full, qualifications must be made for the items in question.

Recommendations: A recommendation must be made where an audit item has met the criteria but shows certain weaknesses.

Regulatory requirements

The regulatory requirements are listed in *italics* below the main title of the relevant audit field.

- Abbreviations:
 - A = audit;
 - CA = critical assessment;
 - FI = financial intermediary.

Data relevant for supervisory purposes

The following data must be collected from the audited FI; the audit firm evaluates the plausibility of data by conducting a critical assessment every three years.

- Has a critical assessment been carried out?

Yes No

Data relevant for supervisory purposes

Data relevant for the audit period

Number of branches and/or group companies within the meaning of Arts. 5 and 6 AMLO-FINMA in Northern/Western Europe¹ and/or EU countries, the US, Canada, Japan, South Korea, Australia and/or New Zealand on the audit date:

Number of branches and/or group companies within the meaning of Arts. 5 and 6 AMLO-FINMA in Eastern/South-Eastern Asia¹ (excluding Japan and South Korea) and/or India on the audit date:

Number of branches and/or group companies within the meaning of Arts. 5 and 6 AMLO-FINMA in Southern/Eastern Europe¹ (excluding EU countries), Africa, Central Asia¹, Western/Southern Asia¹ (excluding India) and/or Latin America¹ on the audit date:

Number of business relationships with legal entities in majority state ownership (outside Switzerland, Liechtenstein and the EU) with assets under management (AuM) over CHF 100m per audit date:

Number of permanent business relationships (master account) on the audit date:

Number of permanent business relationships (master account) with foreign PEPs as the contracting party, controller, beneficial owner of assets and/or power of attorney on the audit date:

Number of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Northern/Western Europe¹ and/or EU countries, the US, Canada, Japan, South Korea, Australia and/or New Zealand on the audit date:

Number of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Eastern/South-Eastern Asia¹ (excluding Japan and South Korea) and/or India on the audit date:

Number of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Southern/Eastern Europe¹ (excluding EU countries), Africa, Central Asia¹, Western/Southern Asia¹ (excluding India) and/or Latin America¹ on the audit date:

Number of permanent business relationships (master account) with private individuals and/or private individuals as beneficial owners of managed assets (incl. double-counting; see FINMA Circular 15/1, margin no. A5-121 ff.) < CHF 1,000,000 on the audit date:

Number of permanent business relationships (master account) with private individuals and/or private individuals as beneficial owners of managed assets (incl. double-counting; see FINMA Circular 15/1, margin nos. A5-121 ff.) from CHF 1,000,000 to CHF 5,000,000 on the audit date:

Data

<p>Number of permanent business relationships (master account) with private individuals and/or private individuals as beneficial owners of managed assets (incl. double-counting; see FINMA Circular 15/1, margin nos. A5-121 ff.) > CHF 5,000,000 on the audit date:</p>		
<p>Number of permanent business relationships (master account) with the following products and services on the audit date: trade financing and/or export financing:</p>		
<p>Number of permanent business relationships (master account) with the following products and services on the audit date: numbered accounts and/or retained mail:</p>		
<p>Number of permanent business relationships (master account) with foundations, domiciliary companies and/or trusts domiciled in offshore centres² on the audit date:</p>		
<p>Number of permanent correspondent bank business relationships (master account) with banks outside Switzerland on the audit date:</p>		
<p>Number of permanent business relationships (master account) with increased risk³ (total) on the audit date:</p>		
<p>Number of permanent business relationships (master account) with increased risk³ (newly established)⁴ on the audit date:</p>		
<p>Number of transactions with increased risk⁵ (excl. cash transactions) on the audit date (since the last audit):</p>		
<p>Number of reports to the MROS on the audit date (since the last audit):</p>		
<p>Percentage of client assets managed by external asset managers on the audit date:</p>		
<p>Total assets under management (incl. double counting; see FINMA Circular 15/1, margin no. A5-121 ff.) on the audit date (in CHF):</p>		
<p>Total assets under management (incl. double counting; see FINMA Circular 15/1, margin no. A5-121 ff.) of permanent business relationships (master account) with foreign PEPs as the contracting party, controller, beneficial owner of assets and/or power of attorney on the audit date (in CHF):</p>		
<p>Total assets under management (incl. double counting; see FINMA Circular 15/1, margin no. A5-121 ff.) of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Northern/Western Europe¹ and/or EU countries, the US, Canada, Japan, South Korea, Australia and/or New Zealand on the audit date (in CHF):</p>		
<p>Total assets under management (incl. double counting; see FINMA Circular 15/1, margin nos. A5-121 ff.) of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Eastern/South-Eastern Asia¹ (excluding Japan and South Korea) and/or India on the audit date (in CHF):</p>		
<p>Total assets under management (incl. double counting; see FINMA Circular 15/1, margin no. A5-121 ff.) of permanent business relationships (master account) with contracting parties and/or beneficial owners domiciled/residing in Southern/Eastern Europe¹ (excluding EU countries), Africa, Central Asia¹, Western/Southern Asia¹ (excluding India) and/or Latin America¹ on the audit date (in CHF):</p>		

Data

Total assets under management (incl. double counting; see FINMA Circular 15/1, margin no. A5-121 ff.) of permanent business relationships (master account) with increased risk⁶ on the audit date (in CHF):

¹ According to the definition of the United Nations' geographical regions (<http://unstats.un.org/unsd/methods/m49/m49regnf.htm>).

² For this data collection, offshore centres include Anguilla, the Antilles, the Bahamas, Bahrain, Barbados, Belize, Bermuda, the British Virgin Islands, Cayman, Cyprus, Delaware, Florida (Miami), Gibraltar, Guernsey, Hong Kong, Isle of Man, Ireland, Jersey, Macao, Malta, the Marshall Islands, Mauritius, Monaco, Nevada, Nevis, Panama, the Seychelles, Singapore, South Dakota and Wyoming.

³ In accordance with the criteria used by the FI.

⁴ Newly established permanent business relationships (master account) since the last audit.

⁵ In accordance with the criteria used by the FI.

⁶ In accordance with the criteria used by the FI.

1.	Identification of the contracting party (new business relationships) <i>(Art. 3 AMLA; Arts. 4-19 CDB 16)</i>	A X
<p>Random samples by audit firm (frequency: annual): Have the contracting parties been identified correctly in accordance with regulations and internal guidelines?</p> <p>Statistical data: Random sample size: _____ Number of files: _____ out of _____ (population⁷) Number of files with qualifications: _____ absolute: _____ relative: 0.00%</p> <p>Qualifications (brief description, if compliance < 100%): _____ risk assessment</p> <p>Recommendations: _____ please select</p> <p>Comments:</p>		
⁷ Newly established permanent business relationships (master account) since the last audit.		
1.1	Are there appropriate and regulation-compliant internal guidelines in place for identifying the contracting party? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>
1.2	When delegating the identification of the contracting parties: Are the conditions and modalities for engaging third parties (<i>Art. 28 f. AMLO-FINMA</i>) being adhered to? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>

2.	Establishing the identity of the controller (new business relationships) <i>(Art. 2a para. 3 AMLA; Art. 20 ff. CDB 16)</i>	A X
<p>Random samples by audit firm (frequency: annual): Has the identity of the controller been established correctly in accordance with regulations and internal guidelines?</p> <p>Statistical data: Random sample size: _____ Number of files: _____ out of _____ (population⁸) Number of files with qualifications: _____ absolute: _____ relative: 0.00%</p> <p>Qualifications (brief description, if compliance < 100%): _____ risk assessment</p> <p>Recommendations: _____ please select</p> <p>Comments:</p>		
⁸ Newly established permanent business relationships (master account) since the last audit.		
2.1	Are there appropriate and regulation-compliant internal guidelines in place for establishing the identity of the controller and of the deputy manager? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>
2.2	Where establishing the identity of the controller is delegated: Are the conditions and modalities for engaging third parties (<i>Art. 28 f. AMLO-FINMA</i>) being adhered to? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>

3.	Establishing the identity of the beneficial owner of the assets (new business relationships) <i>(Art. 4 AMLA; Arts. 27-42 CDB 16)</i>	A X
<p>Random samples by audit firm (frequency: annual): Has the identity of the beneficial owner been established correctly in accordance with regulations and internal guidelines?</p> <p>Statistical data: Random sample size: _____ Number of files: _____ out of _____ (population⁹) Number of files with qualifications: _____ absolute: _____ relative: 0.00%</p> <p>Qualifications (brief description, if compliance < 100%): _____ risk assessment</p> <p>Recommendations: _____ please select</p> <p>Comments:</p>		
⁹ Newly established permanent business relationships (master account) since the last audit.		
3.1	Are there appropriate and regulation-compliant internal guidelines in place for establishing the identity of the beneficial owners? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>
3.2	Where establishing the identity of the beneficial owner is delegated: Are the conditions and modalities for engaging third parties (<i>Art. 28 f. AMLO-FINMA</i>) being adhered to? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>

4.	Repeating verification of the contracting parties' identity or establishing the identity of the beneficial owners <i>(Art. 5 AMLA; Art. 46 CDB 16)</i>	A CA
4.1	Are there appropriate and regulation-compliant internal guidelines in place for repeating verification of the contracting parties' identity or establishing the identity of the beneficial owners? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>

5.	Global monitoring of legal and reputational risks Branch offices and group companies abroad or management of a financial group <i>(Art. 5 f. AMLO-FINMA)</i>	A CA
5.1	Has the FI (e.g. by means of internal guidelines or controls) ensured that its foreign branch offices or subsidiaries are in compliance with the relevant principles of the <i>AMLA</i> and the <i>AMLO-FINMA</i> , as well as with any local regulations that apply? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/> n/a <input type="checkbox"/>

6.	Banned assets and business relationships <i>(Art. 7 f. AMLO-FINMA)</i>	A CA								
<p><u>Random samples by audit firm (frequency: every three years if audit depth "Audit" applies):</u> In the random samples¹⁰ checked as part of this audit, how many files contained indications that the FI has accepted banned assets and/or entered into banned business relationships?</p>										
<p>Statistical data:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Random sample size:</td> <td style="width: 20%;">Number of files:</td> <td style="width: 20%;"></td> <td style="width: 20%;"></td> </tr> <tr> <td>Number of files with qualifications:</td> <td>absolute:</td> <td>relative:</td> <td>0.00%</td> </tr> </table>			Random sample size:	Number of files:			Number of files with qualifications:	absolute:	relative:	0.00%
Random sample size:	Number of files:									
Number of files with qualifications:	absolute:	relative:	0.00%							
<p>Qualifications (brief description, if compliance < 100%): risk assessment</p>										
<p>Recommendations:</p>										
<p>Comments:</p>										
<p>¹⁰ It is not necessary to make individual random samples for this audit item; instead, reference must be made to all other random samples checked as part of this audit.</p>										
6.1	Is the handling of banned assets and banned business relationships regulated in internal guidelines which are appropriate and compliant with regulatory requirements? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>								
6.2	Are there appropriate and regulation-compliant internal guidelines in place for implementing sanctions and embargos (in accordance with Art. 12 para. 2 BO and the EmbA)? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>								
6.3	How quickly are the names of newly included persons on sanction lists compared against the customer base?	<input type="checkbox"/> Within a week <input type="checkbox"/> Within a month <input type="checkbox"/> More than a month								
6.4	How quickly are the names of newly included persons on sanction lists updated in the transaction filters?	<input type="checkbox"/> Within a week <input type="checkbox"/> Within a month <input type="checkbox"/> More than a month								

7.	General due diligence requirements Client and beneficiary information for payment orders <i>(Art. 10 f. AMLO-FINMA)</i>	A CA								
<p><u>Random samples by audit firm (frequency: every three years if audit depth "Audit" applies):</u> compliance with Art. 10 paras. 1 and 2 AMLO-FINMA</p>										
<p>Statistical data:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Random sample size:</td> <td style="width: 20%;">Number of payment orders:</td> <td style="width: 20%;">out of</td> <td style="width: 20%;">(population¹¹)</td> </tr> <tr> <td>Number of files with qualifications:</td> <td>absolute:</td> <td>relative:</td> <td>0.00%</td> </tr> </table>			Random sample size:	Number of payment orders:	out of	(population ¹¹)	Number of files with qualifications:	absolute:	relative:	0.00%
Random sample size:	Number of payment orders:	out of	(population ¹¹)							
Number of files with qualifications:	absolute:	relative:	0.00%							
<p>Qualifications (brief description, if compliance < 100%): risk assessment</p>										
<p>Recommendations:</p>										
<p>Comments:</p>										
<p>¹¹ Number of payment orders executed since the last audit.</p>										
7.1	Is compliance with Art. 10 paras. 1 and 2 AMLO-FINMA ensured by using appropriate IT systems? Reason if the question was answered with "No":	Yes <input type="checkbox"/> No <input type="checkbox"/>								

8.	Special due diligence requirements <i>(Art. 13 ff. AMLO-FINMA)</i>									
8.1	Business relationships with increased risk	A X								
<p><u>Random samples by audit firm (frequency: annual):</u> Have the necessary additional enquiries which apply to business relationships with foreign PEPs been documented plausibly and coherently for non-involved third parties?</p>										
<p>Statistical data:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Random sample size:</td> <td style="width: 20%;">Number of files:</td> <td style="width: 20%;">out of</td> <td style="width: 20%;">(population¹²)</td> </tr> <tr> <td>Number of files with qualifications:</td> <td>absolute:</td> <td>relative:</td> <td>0.00%</td> </tr> </table>			Random sample size:	Number of files:	out of	(population ¹²)	Number of files with qualifications:	absolute:	relative:	0.00%
Random sample size:	Number of files:	out of	(population ¹²)							
Number of files with qualifications:	absolute:	relative:	0.00%							
<p>Qualifications (brief description, if compliance < 100%): risk assessment</p>										
<p>Recommendations: please select</p>										
<p>Comments:</p>										
<p>¹² All permanent business relationships which qualify as a business relationship with increased risk with foreign PEPs as the contracting party, controller, beneficial owner of assets or power of attorney.</p>										
<p><u>Random samples by audit firm (frequency: annual):</u> Have the necessary additional enquiries which apply to business relationships with other PEPs been documented plausibly and coherently for non-involved third parties?</p>										
<p>Statistical data:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Random sample size:</td> <td style="width: 20%;">Number of files:</td> <td style="width: 20%;">out of</td> <td style="width: 20%;">(population¹³)</td> </tr> <tr> <td>Number of files with qualifications:</td> <td>absolute:</td> <td>relative:</td> <td>0.00%</td> </tr> </table>			Random sample size:	Number of files:	out of	(population ¹³)	Number of files with qualifications:	absolute:	relative:	0.00%
Random sample size:	Number of files:	out of	(population ¹³)							
Number of files with qualifications:	absolute:	relative:	0.00%							
<p>Qualifications (brief description, if compliance < 100%): risk assessment</p>										
<p>Recommendations: please select</p>										
<p>Comments:</p>										
<p>¹³ All permanent business relationships which qualify as a business relationship with increased risk with other PEPs as the contracting party, controller, beneficial owner of assets or power of attorney.</p>										

Random samples by audit firm (frequency: annual): Have the necessary additional enquiries which apply to business relationships with foreign banks for which the FI transacts correspondent bank business been documented plausibly and coherently for non-involved third parties?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁴)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

¹⁴ All permanent business relationships which qualify as a business relationship with increased risk with foreign banks for which the FI transacts correspondent bank business.

Random samples by audit firm (frequency: annual): Have the necessary additional enquiries which apply to other business relationships with increased risk been documented plausibly and coherently for non-involved third parties?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁵)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

¹⁵ All permanent business relationships which qualify as a business relationship with increased risk (without PEPs and correspondent banking relationships).

Random samples by audit firm (frequency: annual): Did top management or a senior manager or body decide on the establishment of business relationships with increased risk (without PEPs) in accordance with internal guidelines (Art. 18 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁶)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

¹⁶ All newly established permanent business relationships which qualify as a business relationship with increased risk (without PEPs) since the last audit.

Random samples by audit firm (frequency: annual): Were the business relationships with increased risk (without PEPs) subjected to adequate periodic controls (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁷)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

¹⁷ All permanent business relationships which qualify as a business relationship with increased risk (without PEPs).

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide about the establishment of business relationships with domestic PEPs which, combined with one or more further risk criteria, qualify as business relationships with increased risk (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁸)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

¹⁸ Newly established business relationships with domestic PEPs as the contracting party, controller, beneficial owner of assets or power of attorney which, combined with one or more further risk criteria, qualify as a business relationship with increased risk since the last audit.

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide about the establishment of business relationships with foreign PEPs (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population¹⁹)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): risk assessment

Recommendations: please select

Comments:

¹⁹ Newly established business relationships with foreign PEPs as the contracting party, controller, beneficial owner of assets or power of attorney since the last audit.

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide about the establishment of business relationships with PEPs in leading functions at intergovernmental organisations or international sports federations which, combined with one or more further risk criteria, qualify as a business relationship with increased risk (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population²⁰)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): risk assessment

Recommendations: please select

Comments:

²⁰ Newly established business relationships with PEPs in leading functions at intergovernmental organisations or international sports federations as the contracting party, controller, beneficial owner of assets or power of attorney which, combined with one or more further risk criteria, qualify as a business relationship with increased risk since the last audit.

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide about the establishment of business relationships with foreign banks for which the FI transacts correspondent bank business (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population²¹)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): risk assessment

Recommendations: please select

Comments:

²¹ Newly established business relationships with foreign banks as contracting parties for which the FI transacts correspondent bank business since the last audit.

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide about the continuation of business relationships with domestic PEPs which, combined with one or more further risk criteria, qualify as business relationships with increased risk (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population²²)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): risk assessment

Recommendations: please select

Comments:

²² All permanent business relationships which qualify as a business relationship with increased risk with domestic PEPs as the contracting party, controller, beneficial owner of assets or power of attorney which, combined with one or more further risk criteria, qualify as a business relationship with increased risk.

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide annually about the continuation of business relationships with foreign PEPs (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: [] out of [] (population²³)
 Number of files with qualifications: absolute: [] relative: 0.00%

Qualifications (brief description, if compliance < 100%): risk assessment

Recommendations: please select

Comments:

²³ All permanent business relationships which qualify as a business relationship with increased risk with foreign PEPs as the contracting party, controller, beneficial owner of assets or power of attorney.

Audit items

Random samples by audit firm (frequency: annual): Did top management or at least one of its members decide annually about the continuation of business relationships with PEPs in leading functions at intergovernmental organisations or international sports federations which, combined with one or more further risk criteria, qualify as a business relationship with increased risk (Art. 19 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: out of (population²⁴)
 Number of files with qualifications: absolute: relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

²⁴ All permanent business relationships which qualify as a business relationship with increased risk with PEPs in leading functions at intergovernmental organisations or international sports federations as the contracting party, controller, beneficial owner of assets or power of attorney which, combined with one or more further risk criteria, qualify as a business relationship with increased risk.

Random samples by audit firm (frequency: annual): Does the FI determine and flag up business relationships with increased risk and those with PEPs in compliance with regulatory requirements (Art. 13 para. 6 AMLO-FINMA)?

Statistical data:
 Random sample size: Number of files: out of (population²⁵)
 Number of files with qualifications: absolute: relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

²⁵ All permanent business relationships at the time of the audit.

8.1.1	Are there appropriate and regulation-compliant internal guidelines in place for regulating business relationships with increased risks? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.2	Are there appropriate and regulation-compliant internal guidelines in place for regulating high risk business relationships with foreign PEPs? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.3	Are there appropriate and regulation-compliant internal guidelines in place for regulating business relationships with domestic PEPs? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.4	Are there appropriate and regulation-compliant internal guidelines in place for regulating business relationships with PEPs in leading functions at intergovernmental organisations? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.5	Are there appropriate and regulation-compliant internal guidelines in place for regulating business relationships with PEPs in leading functions at international sport organisations? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.6	Are there appropriate and regulation-compliant internal guidelines in place for regulating business relationships with foreign banks for which the FI transacts correspondent bank business? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.1.7	Which of the following criteria does the FI use as an indicator for business relationships with increased risk (Art. 13 AMLO-FINMA)?		
	Registered office or domicile of the contracting party	<input type="checkbox"/>	used
	Registered office or domicile of the beneficial owner of the assets	<input type="checkbox"/>	
	Registered office or domicile of the controller	<input type="checkbox"/>	
	Citizenship of the contracting party	<input type="checkbox"/>	
	Citizenship of the beneficial owner of the assets	<input type="checkbox"/>	
	Type of business activity of the contracting party	<input type="checkbox"/>	
	Type of business activity of the beneficial owner of the assets	<input type="checkbox"/>	
	Place of business activity of the contracting party	<input type="checkbox"/>	
	Place of business activity of the beneficial owner of the assets	<input type="checkbox"/>	
	Absence of personal contact with the contracting party	<input type="checkbox"/>	
	Absence of personal contact with the beneficial owner of the assets	<input type="checkbox"/>	
	Type of services requested	<input type="checkbox"/>	
	Type of products requested	<input type="checkbox"/>	
	Amount of deposited assets	<input type="checkbox"/>	
	Amount of asset inflow	<input type="checkbox"/>	
	Amount of asset outflow	<input type="checkbox"/>	
	Country of origin of frequent payments	<input type="checkbox"/>	
	Target country of frequent payments	<input type="checkbox"/>	
	Complexity of structures, in particular the use of domiciliary companies	<input type="checkbox"/>	

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8.1.8	Has the FI developed criteria to identify qualified tax offence as an indicator for business relationships with increased risk (Art. 21 AMLO-FINMA)? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
8.1.9	Are there appropriate and regulation-compliant internal guidelines in place for identifying and flagging up business relationships as set out in 8.1.8 above? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Random samples by audit firm (frequency: annual); Does the FI determine and flag up business relationships in connection with a qualified tax offence in compliance with regulatory requirements (Art. 21 AMLO-FINMA)?

Statistical data:
 Random sample size: _____ Number of files: _____ out of _____ (population²⁶)
 Number of files with qualifications: _____ absolute: _____ relative: 0.00%

Qualifications (brief description, if compliance < 100%): _____ **risk assessment** _____

Recommendations: _____ please select _____

Comments: _____

²⁶ It is not necessary to make individual random samples for this audit item; instead, reference can be made to random samples for the previous audit item "Does the FI determine and flag up business relationships with increased risk and those with PEPs in compliance with regulatory requirements (Art. 13 para. 6 AMLO-FINMA)?".

8.1.10	Is it correct that the FI does not use a combination of criteria for identifying business relationships with increased risk? If no, the reasons must indicate which combinations are used and how (e.g. country in combination with amount of deposited assets). Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
8.1.11	Are there appropriate and regulation-compliant internal guidelines in place for making additional enquiries into business relationships with increased risk? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
8.1.12	Does the FI have an appropriate IT-supported monitoring system for identifying and flagging up business relationships with increased risk and those with PEPs? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

8.2 Transactions with increased risk
(Art. 14 ff. AMLO-FINMA)

FI without IT-supported transaction monitoring system: **A**

FI with IT-supported transaction monitoring system: **A** **x**

Random samples by audit firm (frequency: annual [for FI without IT-supported transaction monitoring system]; every three years if audit depth "Audit" applies [for FI with IT-supported transaction monitoring system]); Were additional enquiries into transactions with increased risk documented plausibly, on due date and coherently for non-involved third parties?

Statistical data:
 Random sample size: _____ Number of transactions: _____ out of _____ (population²⁷)
 Number of transactions with qualifications: _____ absolute: _____ relative: 0.00%

Qualifications (brief description, if compliance < 100%): _____ **risk assessment** _____

Recommendations: _____

Comments: _____

²⁷ All transactions with increased risk using the criteria developed by the FI since the last audit.

8.2.1	Are there appropriate and regulation-compliant internal guidelines in place for identifying and carrying out additional enquiries into transactions with increased risk? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
8.2.2	Does the FI have an appropriate IT-supported transaction monitoring system for identifying transactions with increased risk? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/> n/a <input checked="" type="checkbox"/>

9. Organisational measures
(Art. 23 ff. AMLO-FINMA) **A** **CA**

9.1	Does the FI have an appropriately organised and adequately qualified competence centre for combating money laundering? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
9.2	Are its duties compliant with statutory provisions (Art. 24 f. AMLO-FINMA)? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
9.3	Is a compliant and approved risk analysis in place (Art. 25 para. 2 AMLA-FINMA)? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
9.4	In the event of outsourcing, has an expert been appointed to operate the competence centre for combating money laundering? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
9.5	Is there an appropriate internal training programme for the FI's business activities? Reason if the question was answered with "No":	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

A X

10. Duty to report and freezing of assets
(Art. 30 ff. GwV-FINMA)

Random samples by audit firm (frequency: annual if audit depth "Audit" applies): In the random samples checked as part of this audit, how many files contained indications that the FI has violated its duty to report (Art. 9 AMLA)?²⁸

Statistical data:
 Random sample size: Number of files: absolute: relative: 0.00%
 Number of files with qualifications:

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

²⁸ It is not necessary to make individual random samples for this audit item; instead, reference must be made to all other random samples checked as part of this audit.

Random samples by audit firm (frequency: every three years if audit depth "Audit" applies): Were the assets reported under Art. 9 para. 1 let. a AMLA frozen immediately after notification by MROS that it would pass on the information to the competent criminal authority (Art. 10 para. 1 AMLA)?

Statistical data:
 Random sample size: Number of files: out of (population²⁹)
 Number of files with qualifications: absolute: relative: 0.00%

Qualifications (brief description, if compliance < 100%): **risk assessment**

Recommendations: please select

Comments:

²⁹ All business relationships affected by a money laundering notification since the last audit.

10.1 Does the FI use organisational measures to ensure that the MROS is notified immediately where there are justified suspicions of money laundering? Yes No
Reason if the question was answered with "No":

10.2 Does the FI use organisational measures to ensure that only top management and/or persons with controlling (not return-oriented) functions decide to exercise the duty or right to report? Yes No
Reason if the question was answered with "No":

10.3 Does the FI use organisational measures to ensure that the assets reported under Art. 9 para. 1 let. a AMLA are frozen immediately after notification by MROS that it would pass on the information to the competent criminal authority? Yes No
Reason if the question was answered with "No":

11. Compliance risk assessment of money laundering regulations by audit firm
(Margin no. 79 ff. incl. Annex 13 to FINMA Circular 2013/3 (Auditing))

11.1 How high does the audit firm estimate the inherent risk regarding the audited institution's compliance with money laundering regulations (as stated in the last risk analysis submitted to FINMA)? very high
high
medium
low
Is the last assessment still appropriate? Yes No
Reason if the question was answered with "No":

11.2 How high does the audit firm estimate the control risk regarding the audited institution's compliance with money laundering regulations (as stated in the last risk analysis submitted to FINMA)? high
medium
low
Is the last assessment still appropriate? Yes No
Reason if the question was answered with "No":

11.3 How high does the audit firm estimate the net risk regarding the audited institution's compliance with money laundering regulations (as stated in the last risk analysis submitted to FINMA)? very high
high
medium
low
Is the last assessment still appropriate? Yes No
Reason if the question was answered with "No":