



**THE INSTITUTE OF  
Company Secretaries of India**

**भारतीय कम्पनी सचिव संस्थान**

**IN PURSUIT OF PROFESSIONAL EXCELLENCE**

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(Under the jurisdiction of Ministry of Corporate Affairs)

## **FAQs on “AML & CFT Guidelines for Professionals with Certificate of Practice from ICAI, ICSI and ICMAI”**

### **Question 1: What is AML?**

**ANS:** AML stands for ‘Anti-Money Laundering’.

### **Question 2: What is CFT?**

**ANS:** CFT stands for ‘Countering the Financing of Terrorism’.

### **Question 3: What is CDD?**

**ANS:** CDD stands for ‘Customer Due Diligence’ / ‘Client Due Diligence’.

### **Question 4: How to conduct CDD?**

**ANS:** According to Rule 9 of PML (Maintenance of Records) Rules, 2005, relevant persons should adopt written procedures to implement the anti-money laundering provisions as envisaged under the Prevention of Money-Laundering Act, 2002 related to the ‘Client Due Diligence Process’. Relevant persons should perform robust due diligence on clients/ counterparties, identify risk-related details about the client through sanctions screening, store customer KYC information for up to five years, and retain all identification documents secured through the CDD measures for a period of at least five years. The extent of the ongoing CDD measures applied should be determined on a risk-sensitive basis.

### **Question 5: What is CKYCR?**

**ANS:** The CKYCR (Central KYC Registry) is a centralized repository of KYC records of customers in the financial sector with uniform KYC norms and inter-usability of the KYC records across the sector with an objective to reduce the burden of producing KYC documents and getting those verified every time when the customer creates a new relationship with a financial entity.

### **Question 6: Who maintains CKYCR?**

**ANS:** The CKYCR (Central KYC Registry) is maintained by the Central Registry of Securitization Asset Reconstruction and Security Interest of India (CERSAI).

**Question 7: What is FATF?**

**ANS:** FATF stands for 'Financial Action Task Force'. It is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorism financing, and other related threats to the integrity of the international financial system.

**Question 8: How do I access CKYCR?**

**ANS:** You may refer to the official website of CKYCR i.e. <https://www.ckycindia.in/ckyc/index.php> or contact the concerned authorities for more information on how to access it.

**Question 9: How is CDD different from KYC?**

**ANS:** CDD stands for Customer Due Diligence, while KYC stands for Know Your Customer. KYC is a part of CDD, which involves verifying the identity of the customer and assessing the risk associated with the customer. CDD, on the other hand, is a broader concept that includes KYC and other measures to identify and mitigate the risks associated with a customer. CDD involves ongoing monitoring of the customer's transactions and activities to ensure that they are consistent with the customer's profile and expected behaviour. In summary, KYC is a subset of CDD, and CDD is a more comprehensive process that includes KYC and other measures.

**Question 10: What does 'person carrying on designated business or profession' mean?**

**ANS:** The term 'person carrying on designated business or profession' is defined in sub-clause (vi) of clause (sa) of sub-section (1) of section 2 of the Prevention of Money-Laundering Act, 2002 (PMLA, 2002). It includes persons carrying on such other activities as the Central Government may, by notification, so designate from time-to-time. In exercise of said powers, the Central Government, vide notification F.No. P-12011/12/2022-ES Cell-DOR dated May 03, 2023, notified certain financial transactions carried out by relevant persons, such as, individuals who obtained a certificate of practice under section 6 of the Chartered Accountants Act, 1949, under section 6 of the Company Secretaries Act, 1980, and under section 6 of the Cost and Works Accountants Act, 1959. Therefore, a person carrying on designated business or profession refers to individuals or entities engaged in activities that are notified by the Central Government as 'person carrying on designated business or profession' under the PMLA, 2002.

**Question 11: Are company secretaries included within the ambit of 'person carrying on designated business or profession'?**

**ANS:** Yes, individuals who obtained a certificate of practice under section 6 of the Company Secretaries Act, 1980, and carrying out the financial transactions, on behalf of client in relation to activities provided under the guideline, are included within the ambit of "person carrying on designated business or profession" under the Prevention of Money-Laundering Act, 2002 (PMLA). (notification F.No. P-12011/12/2022-ES Cell-DOR dated May 03, 2023).

**Question 12: What is counter-terrorism financing?**

**ANS:** CFT stands for Countering the Financing of Terrorism. It refers to the set of policies, procedures, and regulations designed to prevent the use of financial systems and institutions for the funding of terrorist activities. CFT measures are aimed at identifying, assessing, and mitigating the risks of terrorist financing, and ensuring that financial institutions and other relevant entities have effective systems and controls in place to prevent such activities. CFT is an important component of the broader Anti-Money Laundering (AML) framework, and both AML and CFT are often referred to together as AML/CFT.

**Question 13: What is the meaning of 'Relevant Persons'?**

**ANS:** The term "relevant person" refers to individuals or entities engaged in activities, on behalf of their clients that are notified by the Central Government as "person carrying on designated business or profession" under the Prevention of Money-Laundering Act, 2002 (PMLA, 2002). This includes individuals who obtained a certificate of practice under section 6 of the Chartered Accountants Act, 1949, under section 6 of the Company Secretaries Act, 1980, and under section 6 of the Cost and Works Accountants Act, 1959. The guidelines for AML/CFT/CPF (Anti-Money Laundering/Countering the Financing of Terrorism/Combating Proliferation Financing) apply to financial transactions carried out by relevant persons as notified vide a notification issued by the Central Government.

**Question 14: What is the effective date of the notification?**

**ANS:** The guidelines for AML/CFT (Anti-Money Laundering/Countering the Financing of Terrorism) shall take effect immediately, i.e., from June 19, 2023.

**Question 15: What are the obligations of 'relevant person'?**

**ANS:** As per the guidelines, there are certain obligations of 'relevant person' carrying out financial transaction, on behalf of his client, in relation to activities notified under it, which are as follows:

- Appointment of Designated Director and principal officer
- Reporting of suspicious transaction reports to Financial Intelligence Unit- INDIA (FIU-IND)
- Maintenance of records
- Adoption of appropriate policies and procedures to prevent, detect and report money laundering, terrorist financing or proliferation financing activities.
- Performing Client Due Diligence (CDD) / Enhanced Due diligence (EDD)
- Appropriate training to its employees on the procedures for KYC, CDD, sanction screening and record keeping.

**Question 16. What are the provisions w.r.t reporting of reportable transactions?**

**ANS:** The mechanism for reporting of reportable transactions in respect of money laundering, terrorist financing, and proliferation financing has been designed to facilitate filing of reports by the respective relevant persons

carrying out financial transactions, as defined vide 'the notification', through the respective Statutory Bodies (*viz.*, ICAI, ICSI, and ICMAI) referred to as SRBs. Rule 7(3) of the PMLR casts an obligation on every reporting entity to evolve an internal mechanism to detect transactions as specified under Rule 3(1) and furnishing information about such transactions to FIU-IND.

**Question 17. What are the policies and procedures to combat money laundering, counter terrorist financing and combat proliferation financing?**

**ANS:** Rule 7(3) of the PMLR casts an obligation on every reporting entity to evolve an internal mechanism to detect transactions as specified under Rule 3(1) of PMLR, 2005 and furnishing information about such transactions to FIU-IND. The policies and procedures to combat money laundering, counter terrorist financing, and combat proliferation financing are referred to as AML/CFT/CPF Program.

**Question 18. What is AML/CFT/CPF program?**

**ANS:** AML/CFT/CPF Program refers to the policies and procedures to combat money laundering, counter terrorist financing, and combat proliferation financing. Rule 7(3) of the PMLR, 2005 casts an obligation on every reporting entity to evolve an internal mechanism to detect transactions as specified under Rule 3(1) of PMLR, 2005 and furnishing information about such transactions to FIU-IND.

**Question 19. What are the internal policies, procedures and controls to be implemented by relevant persons?**

**ANS:** Every relevant person carrying out financial transactions as notified under 'the notification' must have a robust AML/CFT/CPF policy in place, which shall include the following points:

- To comply with the obligations of relevant persons as specified under PMLA, PMLR, every relevant person/firm shall establish appropriate policies and procedures for the prevention of ML, TF, and PF, and ensure their effectiveness and compliance with all relevant legal and regulatory requirements.
- Adopt policies (board-approved in case of firms) including procedures for dealing with ML, TF and PF risks, reflecting the current statutory and regulatory requirements and guidance/guidelines issued by competent authorities and SRBs.
- Periodically review the policies and procedures on the prevention of ML, TF, and PF to ensure their alignment with extant statutory provisions, rules and guidelines and guidance issued by competent authorities and SRBs.
- Adopt client acceptance and KYC policies and undertake Client Due Diligence (CDD) measures in respect of the financial transactions notified vide 'the notification'.

**Question 20. What are the requirements for Registration of Reporting Entities?**

**ANS:** The requirements for Registration of Reporting Entities are as follows:

- The SRBs shall identify members holding a certificate of practice, who

are undertaking activities notified vide 'the notification'.

- Consequent to identification of such members, the SRBs shall obtain information (name, designation and contact details such as mobile number and email) related to principal officers and/or designated directors from them, as applicable in accordance with clause 4.4.2 of the guidelines.
- In case where the relevant persons as defined under 'the notification' are firms, they shall appoint a Designated Director and Principal Officer, while in case of individual practicing professionals, the professional himself would be the Principal Officer in accordance with rule 2(1)(ba) and 2(1)(f) of PMLR, 2005.
- The list of principal officers and/or designated directors shall be maintained by the SRBs and shall be communicated to FIU-INDIA periodically and in the event of changes.

**Question 21. What are the provisions relating to Appointment of Designated Directors and Principal Officer?**

**ANS:** The provisions relating to Appointment of Designated Directors and Principal Officer are as follows:

- In case where the relevant persons as defined under 'the notification' are firms, they shall appoint a Designated Director and Principal Officer, while in case of individual practicing professionals, the professional himself would be the Principal Officer in accordance with rule 2(1)(ba) and 2(1)(f) of PMLR.
- The Designated Director (where the relevant persons as defined under 'the notification' are firms) and the Principal Officer shall be responsible for the following obligations to combat money laundering/ countering the financing of terrorism/ combat proliferation financing.

**Question 22. What are the Roles and Responsibilities of Designated Director and principal Officer?**

**ANS:** The Roles and Responsibilities of Designated Director and principal officer are as follows:

- The Designated Director (where the relevant persons as defined under 'the notification' are firms) and the Principal Officer shall be responsible for the following obligations to combat money laundering/ countering the financing of terrorism/ combat proliferation financing.
- Furnishing of the information under Rule 8 (1) of the PMLR, 2005, as prescribed under sub rule (1) of Rule 3 of the said rules every month, by 15th day of the succeeding month, in prescribed format to the Director, FIU-IND, as per the mechanism prescribed in clause 5.1.1 of the guidelines. However, the information in respect of a suspicious transaction shall be furnished not later than seven working days on being satisfied that the transaction is suspicious as per Rule 8(2) of the PMLR, 2005. Such information shall include any attempted transactions, whether or not made in cash.
- Evolving an internal mechanism with regard to any directions/ guidelines issued by competent authorities and for furnishing information as prescribed under sub rule (1) of Rule 3 of the PMLR, 2005.



**Question 23. Who shall be the Nodal Officer of SRB?**

**ANS:** The SRBs shall undertake appointments of a "Nodal Officer" for the purpose of interaction and information sharing between their respective members and FIU-India, which may include notifications issued by competent authorities from time to time. However, the Guidelines do not provide information on who specifically shall be appointed as the Nodal Officer.

**Question 24. Who shall be SRB?**

**ANS:** Under the guidelines, SRB stands for Statutory Bodies - ICAI, ICSI, ICAI. It mentions that SRBs should proactively adjust the frequency of AML/CFT supervision in line with the risks identified and combine periodic reviews and ad hoc AML/CFT supervision. The Guidelines also provide for SRBs to communicate their regulatory expectations to the regulated members. Additionally, the Guidelines mention that SRBs shall undertake appointments of a "Nodal Officer" and a Permanent Technical Committee. Finally, the Guidelines mention that SRBs shall identify members holding a certificate of practice who are undertaking activities notified vide 'the notification' and obtain information related to principal officers and/or designated directors from them.

**Question 25. What is permanent technical committee to be constituted by SRBs?**

**ANS:** SRBs shall constitute a Permanent Technical Committee whose role is to verify that a relevant person filing prescribed report is holding a certificate of practice, before forwarding the report to FIU-India. The contact details of the head of the Permanent Technical Committee shall be communicated to FIU-IND within a reasonable time in the event of changes.

**Question 26. What shall be the composition of the Permanent Technical Committee?**

**ANS:** The Guidelines do not mention the composition of the Permanent Technical Committee to be constituted by SRBs. It only mentions that the role of the committee is to verify that a relevant person filing prescribed report is holding a certificate of practice, before forwarding the report to FIU-India.

**Question 27. What are the training requirements for employees of Relevant person?**

**ANS:** Guidelines provide that relevant person carrying out financial transactions should have adequate screening procedures when hiring employees and instruction manual on the procedures for KYC, CDD, sanction screening, record keeping and transaction monitoring and review should be included in training material.

**Question 28. What are KYC Norms?**

**ANS:** KYC stands for Know Your Customer. KYC norms refer to the mechanism in place for complying with KYC requirements prior to onboarding of clients as well as for carrying out re-KYC and continued due diligence (CDD) of existing customers in accordance with guidelines issued by SRBs in this regard.

**Question 29. What are CDD Norms?**

**ANS:** CDD stands for Client Due Diligence. CDD norms refer to the anti-money laundering provisions as envisaged under the PMLA, 2002 related to the 'Client Due Diligence Process'. Relevant persons as notified under 'the notification' are required to adopt written procedures to implement the anti-money laundering provisions as envisaged under the PMLA, 2002 related to the 'Client Due Diligence Process'. The CDD measures applied should be determined on a risk-sensitive basis. The associated ML/TF/PF risks may change as a business relationship develops.

**Question 30. What does 'enhanced due diligence' mean?**

**ANS:** Enhanced Due Diligence (EDD) refers to the measures and procedures which are more rigorous and robust than normal KYC. Relevant persons as notified under 'the notification' must conduct enhanced due diligence, consistent with the risks identified, where the risks of money laundering, terrorist financing or proliferation financing are higher. In particular, they should increase the degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear unusual or suspicious. The measures applied should be determined on a risk-sensitive basis.

**Question 31. What are EDD Norms?**

**ANS:** EDD Norms refer to the measures and procedures which are more rigorous and robust than normal KYC. Relevant persons as notified under 'the notification' must conduct enhanced due diligence, consistent with the risks identified, where the risks of money laundering, terrorist financing or proliferation financing are higher. It should examine the background and purpose of all complex, unusually large transactions and all unusual patterns of transactions carried out on behalf of their clients, which have no apparent economic or lawful purpose. In particular, they should increase the degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear unusual or suspicious.

**Question 32. What is EDD w.r.t high-risk jurisdictions/persons/entities?**

**ANS:** EDD with respect to high-risk jurisdictions/persons/entities refers to the application of monitoring and EDD due to the potential for increased anonymity or obfuscation of financial flows and the challenges associated with conducting CDD measures to :

- business relationships and transactions with natural and legal persons from higher risk jurisdictions specifically with countries designated as tax- havens and those on the FATF grey and black lists,
- business relationships with Politically Exposed Persons (PEPs).

**Question 33. What is the meaning of sanctions screening for notified activities?**

**ANS:** Sanctions screening for notified activities refers to the process of carrying out screening against designated lists of individuals, entities, and countries whose assets or transactions should be frozen pursuant to targeted

financial sanctions. Relevant persons as notified under 'the notification' must ensure prompt application of the directives when issued by the competent authorities for implementing United Nations Security Council Resolutions, as well as national sanctions, relating to the suppression and combating of terrorism, terrorist financing and proliferation of weapons of mass destruction and its financing, and other related directives, as well as compliance with all other applicable laws, regulatory requirements and guidelines in relation to economic sanctions. Sanctions screening should be carried out both at the time of onboarding, as well as when any of the notified activities are carried out and at the time of additions to designated lists.

**Question 34. What is counterparty screening?**

**ANS:** Counterparty screening refers to the process of ascertaining any emergent risk stemming from suspicious transaction history or other information such as adverse media, published information about regulatory or criminal penalties in respect of their client's counterparty/ies. Relevant persons as notified under 'the notification', when acting on behalf of their clients, should conduct counterparty screening to identify any potential risks associated with their clients' counterparties. This is important to ensure that the transactions or activities are not being used for money laundering, terrorist financing, or proliferation financing.

**Question 35. What are the reporting obligations of relevant persons?**

**ANS:** The reporting obligations of relevant persons as notified under 'the notification' include filing of reports on certain reportable transactions to Financial Intelligence Unit-India (FIU-IND) set up by the Government of India to coordinate and strengthen collection and sharing of financial intelligence through effective national, regional, and global network to combat money laundering, terrorist financing, and proliferation financing. The PMLA, 2002 (Prevention of Money Laundering Act) and PMLR, 2005 (Prevention of Money Laundering Rules) cast obligations pertaining to filing of reports on certain reportable transactions to FIU-IND. The mechanism for reporting of reportable transactions in respect of money laundering, terrorist financing, and proliferation financing has been designed to facilitate filing of reports by the respective relevant persons carrying out financial transactions, as defined vide 'the notification', through the respective Statutory Bodies (*viz.*, ICAI, ICSI, and ICMAI) hereinafter referred to as SRBs.

**Question 36. What are the norms for reporting to FIU-India?**

**ANS:** The norms for reporting to FIU-India include the following:

1. Relevant persons are required to file prescribed reports with FIU-India through the respective SRBs. The SRBs shall verify that they hold a certificate of practice before forwarding the reports to FIU-INDIA.
2. In case of a relevant person holding certificates of practice from multiple SRBs, the relevant SRB shall be determined by such relevant person based on the nature of services provided to the client.
3. The format for reporting transactions, including suspicious transactions made or attempted, as required under Rule 7(2) of PMLR, 2005 would be as prescribed by FIU-IND.



4. Rule 8(2) read with Rule 3(1)(D) of the PMLR, 2005 provides for timely reporting of a suspicious transaction, which also includes reporting of attempted suspicious transactions, to the Financial Intelligence Unit (FIU-IND), if a reporting entity suspects or has reasonable grounds to suspect that funds used by a client are the proceeds of a crime or are related to money laundering, terrorist financing, and proliferation financing.
5. The mechanism for reporting to FIU would be forwarded as a separate document.

**Question 37. What is the mechanism for reporting to FIU-India?**

**ANS:** The mechanism for reporting to FIU-India involves relevant persons filing prescribed reports with FIU-India through the respective Statutory Bodies (SRBs) (*viz.*, ICAI, ICSI, and ICMAI) as notified under 'the notification'. The SRBs shall verify that they hold a certificate of practice before forwarding the reports to FIU-INDIA. In case of a relevant person holding certificates of practice from multiple SRBs, the relevant SRB shall be determined by such relevant person based on the nature of services provided to the client. The format for reporting transactions, including suspicious transactions made or attempted, as required under Rule 7(2) of PMLR, 2005 would be as prescribed by FIU-IND. The mechanism for reporting to FIU would be forwarded as a separate document.

**Question 38. What is the format for reporting Transactions?**

**ANS:** The format for reporting transactions, including suspicious transactions made or attempted, as required under Rule 7(2) of PMLR, 2005 would be as prescribed by FIU-IND. The Guidelines do not provide any further details on the specific format for reporting transactions.

**Question 39. What is Suspicious Transactions Report?**

**ANS:** Suspicious Transactions Report (STR) is a report that needs to be filed by a reporting entity to the Financial Intelligence Unit (FIU-IND) if they suspect or have reasonable grounds to suspect that funds used by a client are the proceeds of a crime or are related to money laundering, terrorist financing, and proliferation financing. Rule 8(2) read with Rule 3(1)(D) of the Prevention of Money Laundering Rules, 2005 (PMLR) provides for timely reporting of a suspicious transaction, which also includes reporting of attempted suspicious transactions, to the Financial Intelligence Unit (FIU-IND).

**Question 40. Has any format been prescribed for the Suspicious Transactions Report?**

**ANS:** The format for reporting transactions, including suspicious transactions made or attempted, as required under Rule 7(2) of PMLR, 2005 would be as prescribed by FIU-IND. The Guidelines do not provide any specific details on the format for Suspicious Transactions Report (STR).

**Question 41. What is the Prohibition on Tipping-off?**

**ANS:** The Prohibition on Tipping-off refers to the prohibition on reporting entities and their directors, officers, and employees (permanent and temporary) from disclosing ("tipping off") that a Suspicious Transactions Report (STR) or any information is furnished to FIU-IND. This prohibition on tipping off extends not only to the filing of the STR and/or any information but even before, during, and after the submission of an STR or any such information to FIU-IND. Thus, it shall be ensured that there is no tipping off to the client at any level as provided for under Section 12(2) of the Prevention of Money Laundering Act, 2002 (PMLA).

**Question 42. What are the provisions relating to Maintenance of Records?**

**ANS:** As per the Guidelines, relevant persons as notified under 'the notification' are required to retain records as defined in Sections 12(1)(a) and 12(1)(e) of the Prevention of Money Laundering Act (PMLA) and for a period of five years after the business relationship between a client and the reporting entity has ended or the engagement has been closed, whichever is later, as mentioned in Section 12(3) and 12(4) of PMLA, in order to ensure that such documents are not destroyed.

**Question 43. What is Risk Assessment?**

**ANS:** Risk Assessment refers to the process of identifying, assessing, and taking effective measures to mitigate money laundering and terrorist financing risk, severally and together, for customers, countries or geographic areas, and services, transactions or delivery channels that is consistent with the national risk assessment duly notified by the Central Government. Risk assessments must be carried out to understand risk exposure. According to the guidelines, a risk-based approach (RBA) must be adopted to facilitate priority allocation of resources for appropriate control and oversight of AML/CFT/CPF safeguards. Relevant persons as notified under 'the notification', shall carry out risk assessment to identify, assess and take effective measures to mitigate money laundering and terrorist financing risk, severally and together, for customers, countries or geographic areas, and services, transactions or delivery channels that is consistent with the national risk assessment duly notified by the Central Government. The risk assessment shall be documented and be kept up-to-date. The Relevant persons as notified under 'the notification', shall consider all the relevant risk factors before determining the level of overall risk and the appropriate level and type of mitigation to be applied to their clients. It shall be made available to competent authorities and SRBs, as and when required. Risk Assessments should be subject to regular review and updation to ensure an effective system for remedying any identified deficiencies.

**Question 44. What is the role of Statutory Bodies?**

**ANS:** The ICAI, ICSI, and ICMAI are Statutory Bodies (SRBs) in respect of the relevant persons as notified under 'the notification', and have a role in regulating the relevant persons that are qualified to enter and practice in the said professions. The SRBs shall undertake appointments of a "Nodal Officer" for the purpose of interaction and information sharing between their respective members and FIU-India, which may include notifications issued by competent authorities from time to time. SRBs shall constitute a Permanent Technical Committee whose role is to verify that a relevant person

filing prescribed report is holding a certificate of practice, before forwarding the report to FIU-India. The contact details of the Nodal Officer and head of the Permanent Technical Committee shall be communicated to FIU-IND within a reasonable time in the event of changes. The SRBs shall also have a role in supervision and monitoring of the relevant persons as notified under 'the notification'.

**Question 45. How do SRBs facilitate supervision and monitoring?**

**ANS:** SRBs should take measures to effectively monitor relevant persons through on-site and off-site supervision, in accordance with their guidelines/ notifications/ ethical standards. SRBs should proactively adjust the frequency of AML/CFT supervision in line with the risks identified and combine periodic reviews and ad hoc AML/CFT supervision. SRBs should communicate their regulatory expectations to the regulated members, including guidance on filing of Suspicious Transaction Reports with FIU-India, which should be issued to the relevant persons as notified under 'the notification'. The SRBs also perform supervisory, advisory, and/or monitoring functions to ensure that the objectives laid down in the PMLA, 2002 and the rules framed thereunder are achieved in letters and spirit.

**Question 46. What is the role of SRBs in mitigating and managing ML/TF/PF Risk?**

**ANS:** SRBs shall take necessary steps for spreading awareness about and encourage the compliance pertaining to legal provisions on AML/CFT/CPF, by their members. SRBs shall ensure that the norms and system are in place to take action against the member who is relevant person as per 'the notification', but has failed to comply with the expectations related to AML/CFT/CPF compliance.

**Question 47: What kind of information can be shared between SRBs and public authorities?**

**ANS:** The type of information that could be shared between SRBs and public authorities (such as FIU-IND and Law enforcement) includes:

- a. ML/TF risk assessments;
- b. Typologies (i.e., case studies) of how money launderers or terrorist financiers have misused relevant persons as notified under 'the notification';
- c. Feedback on STRs and other relevant reports;
- d. Targeted unclassified intelligence.
- e. Countries, persons or organizations whose assets or transactions should be frozen pursuant to targeted financial sanctions.

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