



## IMPORTANT INFORMATION ON YOUR AML/CFT OBLIGATIONS

### Registration Completed!

By registering with the FIU you have taken the first step in becoming compliant with the Anti-Money Laundering/Counter Financing of Terrorism (AML/CFT) Laws of Trinidad and Tobago. We now bring to your attention your additional AML/CFT obligations with which you must comply.

### 1. YOUR COMPLIANCE PROGRAMME OBLIGATIONS

#### a) Appoint a Compliance Officer

The Compliance Officer identified on the registration form is required to complete a **Compliance Officer Fit and Proper Questionnaire** and submit same to the FIU for approval.

As a best practice, the FIU recommends that an alternate to the Compliance Officer be appointed to ensure the effective performance of duties in the absence of the Compliance Officer. A Compliance Officer Fit and Proper Questionnaire must also be completed by the alternate and forwarded to the FIU for review. The **“Compliance Officer Fit and Proper Questionnaire”** is available on our website.

#### b) Develop, Submit and Implement a Compliance Programme

You are required to develop and submit to the FIU your written Compliance Programme within three (3) months from the date of your registration. The FIU has published the following guidelines to assist you:-

- i. **“Guide to Structuring AML/CFT Compliance Programme”;**
- ii. **“Customer Due Diligence Guide No. 1 of 2011”;**
- iii. **“Compliance Programme Checklist”;** and
- iv. **“Compliance Programme – Sample Table of Contents”.**

*Please note that specific guidance notes for the following sectors are available on our website: - Real Estate, Motor Vehicle Dealers, Private Members’ Club, Attorneys-At-Law, Accountants and Jewellers.*

### 2. YOUR REPORTING OBLIGATIONS

#### a) Suspicious Transaction/Suspicious Activity Reporting (SAR/STR) to the FIU

You must make a suspicious transaction or a suspicious activity report to the FIU in the prescribed form as soon as possible, but in any event, within fourteen (14) days of the date on which you knew or had

reasonable grounds to suspect that the funds used for a transaction were the proceeds of a specified offence. The FIU has published on its website the following guidance note:-

- i. **“Guidance Note on Suspicious Transaction/Activity Reporting Standards”**; and
- ii. **“Suspicious Transaction/Activity Report Form”**.

**b) Terrorist Funds Reporting (TFR)**

You must report terrorist funds immediately and without delay to the FIU.

The FIU has published on its website, the following guidance note:-

- i. **“Guidance Note on Procedures for Reporting Terrorist Funds”**; and
- ii. **“Terrorist Funds Report”** Form.

**c) Quarterly Terrorist Property Reporting (QTR) – Financial Institutions ONLY**

If you are a Commercial Bank, Licensed Non-Bank Financial Institution, Building Society, Credit Union/Co-operative Society, Insurance Company, Exchange Bureau, Securities Dealer and Investment Advisor, Cash Remitter, Postal Service, Entity providing Mutual Funds, Development Bank, Trust Company, Mortgage Company and any other person declared by the Minister by Order to be a financial institution you must report to the FIU whether you have or do not have any Terrorist Property in your possession.

You must report every three months on the appropriate QTR form. The FIU has published on its website, the following guidance notes:-

- i. **“Notice to Financial Institutions on Quarterly Reporting of Terrorist Property”**;
- ii. **“General Information for Financial Institutions”**;
- iii. **“Quarterly Terrorist Property Report 1”**; and
- iv. **“Quarterly Terrorist Property Report 2”** Forms.

Please refer to the FIU’s website, [www.fiu.gov.tt](http://www.fiu.gov.tt) where further guidance, publications and reporting forms can be found.

**Director**

**Financial Intelligence Unit**