



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

FINANCIAL INTELLIGENCE UNIT
MINISTRY OF FINANCE AND THE ECONOMY



**NOTICE TO ATTORNEYS-AT-LAW
TO SUBMIT A COMPLIANCE PROGRAMME**

Attorneys'-at-law who have Anti-Money Laundering/Counter Financing of Terrorism (AML/CFT) obligations are reminded of their legal obligation to develop a written Compliance Programme and to submit the Compliance Programme to the Financial Intelligence Unit of Trinidad and Tobago (the FIU) for approval.

This legal obligation is contained in section 55 (5) of the Proceeds of Crime Act, 2000 as amended and Regulation 31 of the FIU Regulations, 2011.

The FIU further advises that the Law Association has published a **model Compliance Programme** which is available on its website www.lawassociationtt.com. The **model Compliance Programme** has been developed in consultation with the FIU.


To assist you in meeting this obligation the following additional resources are available on the FIU's website www.fiu.gov.tt at **Resources>FIU Publications**:

- i. **Guide to Structuring Your AML/CFT Compliance Programme** which explains the essential components of a written Compliance Programme.
- ii. **Customer Due Diligence Guide No. 1 of 2011** which details the "know your customer" policies you must apply.
- iii. **Compliance Programme Checklist** which should be used to verify that your Compliance Programme contains all the necessary elements to meet the legal requirements. The **completed checklist** should accompany the compliance programme.

The written Compliance Programme must be submitted to the FIU by **May 21, 2013** to avoid enforcement action for breach of the said obligation.

Direct any queries to the Compliance and Outreach Unit of the FIU at fiucompliance@gov.tt or (868)-625-8351.

Dated April 22, 2013



Susan S. François
Director
Financial Intelligence Unit