
DATA & COMPLIANCE REPORT (DCR) INFORMATION KIT

(UPDATED AS AT 15 OCTOBER 2024)

2024

DATA & COMPLIANCE REPORT (DCR) INFORMATION KIT

This document is issued to guide reporting institutions to complete the DCR 2024 only. This document is not intended to replace any requirement of the Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Designated Non-Financial Businesses and Professions (DNFBPs) and Non-Bank Financial Institutions (NBFIs) Policy Document.

**Bank Negara Malaysia
15 October 2024**

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INTRODUCTION

The purpose of this document is to guide reporting institutions (RIs) in completing the Data and Compliance Report (DCR) 2024.

DCR is one of supervisory tools adopted by Bank Negara Malaysia (BNM) as the Competent Authority appointed under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA). DCR is issued pursuant to sections 8(3)(a), 16(6) and 25(2) of the AMLA read together with section 143(2) of the Financial Services Act 2013 and section 155(2) of the Islamic Financial Services Act 2013.

DCR became a regular reporting requirement beginning 2020 and is used to gauge reporting institutions' compliance to the AMLA and the Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions (AML/CFT/CPF and TFS) for Designated Non-Financial Businesses and Professions (DNFBPs) and Non-Bank Financial Institutions (NBFIs) [hereinafter referred to as the "Policy Document"], and monitoring of money laundering, terrorism financing and proliferation financing (ML/TF/PF) risks. Similarly, DCR allows RIs to self-assess and understand their compliance to the AML/CFT/CPF requirements as well as to utilise similar information to assess their exposure to ML/TF risks i.e. institutional ML/TF risk assessment.

DCR is issued to RIs under the AMLA which have been specified by BNM to be subjected to the Policy Document. Please refer to the relevant AMLA subsidiary legislation and paragraphs 3.3 and 3.4 of the Policy Document on designation and gazetted activities of RIs.

Submission of DCR 2024 is **mandatory** and **an enforceable requirement** on all reporting institutions specified above.

Please refer to the Infographic and FAQs on the summary of submission requirements

APPLICABILITY: WHO MUST SUBMIT DCR 2024?

DCR 2024 is only applicable to the following sectors:

- Accountants
- Company secretaries
- Registered estate agents
- Lawyers and notaries public
- Dealers in precious metals/stones

Disclaimer:

All the abovementioned RIs are required to submit a DCR as part of the AML/CFT compliance obligations. Filling in the DCR does not tantamount to endorsement of the firm's businesses or products. Bank Negara Malaysia does not endorse, approve, register or license the businesses or products or services offered by any RIs.

DECLARATION OF NON-APPLICABILITY OF DCR 2024

Please fill in the declaration through the DNFBP portal by **15 January 2025** if **your firm** (not your customers) falls into any of the following categories:

Note:

Declaration is on a **firm** basis and submission of DCR 2024 is not required.

- Law firm, accounting firm or company secretarial firm who **do not provide** any of the listed Gazetted Activities in 2022 and 2023 are required to declare non-provision of Gazetted Activities;
- Registered estate agency firm who do not provide any estate agency practice¹ in 2022 and 2023 are required to declare non-provision of estate agency practice;
- Dormant firms; including firms in the process of striking off, winding up and liquidating (still legally exist); or
- The firm has no new and existing transaction or client for 2022 and 2023, i.e. inactive firm, newly incorporated/ registered firm in 2024, etc.

EXEMPTIONS

DCR 2024 **does NOT** apply to:

- Other DNFBP sectors not listed in the 'Applicability' section above;**
- Any RI which has been selected and informed for on-site examination or thematic review for 2024; and
- Lawyers, accountants or company secretaries who are 'internal' professionals that are employees of other types of businesses, or professionals working with government agencies.
- Firms that has ceased to operate i.e. no longer an RI as per First Schedule of the AMLA.

¹ as defined in the Valuers, Appraisers, Estate Agents and Property Managers Act 1981

SUBMISSION

**For any enquiries on DCR 2024:
please email dcr@bnm.gov.my**

- i. The submission period is until **15 January 2025, in the manner specified by BNM. Only completed DCRs will be accepted and processed by BNM for subsequent issuance of a report card to the RI.**
- ii. Please be reminded that all DCR 2024 submissions are final and BNM will not entertain any requests to amend the DCR that has been submitted.
- iii. No extension of timeline will be provided for DCR 2024.
- iv. Information submitted by RIs in the DCR 2024 are confidential and will be used by BNM for supervisory purposes and risks assessments. RIs are required to attest at the end of the DCR 2024 that all information provided is complete and accurate to the best of their knowledge

Note:

RIs are advised to use the DCR and its corresponding report card issued as self-assessment tools to help identify gaps and areas of improvements in complying with the AML/CFT requirements.

ADDITIONAL INFORMATION

Please submit **separate DCRs** for the following:

- a group of companies or multiple practising certificates holders doing different activities under AMLA (e.g. group of companies undertaking accounting and company secretarial business)
- firms with same brand name but operating independently (e.g. law firms that have branch offices with the name of 'ABC & Partners' but each operating independently)

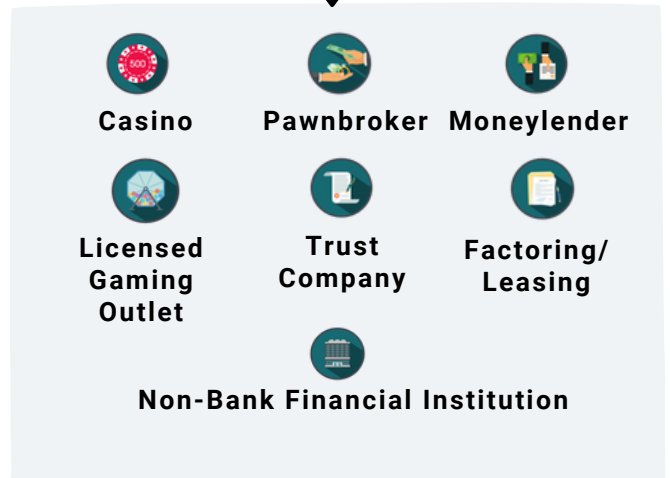
**RIs can download the PDF
format of the DCR 2024 questions
from the DNFBP portal**

Note:

- ***The link features questions for all sectors. You may refer to questions that are relevant to your sectors, especially for Part B***
- ***Before starting the DCR, it is recommended that the RI review the PDF copy and compile the information beforehand to assist in responding the DCR.***

WHO NEEDS TO SUBMIT DCR 2024?

WHICH SECTOR ARE YOU?



Are you **ANY** of the following?

- 1 An internal company secretary, lawyer (i.e. legal officer), or accountant?
- 2 A firm that has been selected and informed of 2024 on-site examination and thematic review?

YES



**NOT
REQUIRED TO
SUBMIT DCR 2024**

NO

Does your firm fulfil **ANY** of the following criteria for year 2022 and 2023?

- 1 Dormant/ striking off/ winding up/ liquidating
- 2 Non-provision of Gazetted Activities (GA)
- 3 Non-provision of estate agency practice
- 4 No new and existing transaction/ no client for the entirety of 2022 and 2023, i.e. inactive firms, newly incorporated/ registered firms in 2022 and 2023, etc.

YES

**DECLARE YOUR STATUS
OF NON-APPLICABILITY
OF DCR 2024 THROUGH
THE DNFBP PORTAL**

NO

**SUBMIT
DCR 2024**

Submission is **MANDATORY** for your firm

ATTENTION

- Submission is at **FIRM** level
- Submission period is from **15 October to 15 January 2025**
- **No further extension** will be provided

FAQS ON SUBMISSION REQUIREMENT

GENERAL SUBMISSION

1. Is submission of the DCR mandatory?

Yes. Submission of the DCR is compulsory and is an enforceable requirement on all specified sector reporting institutions (RIs).

Depending on your firm's situation, your firm should choose to **either** declare your status of non-applicability of DCR 2024 or submit DCR 2024, not both.

2. My firm has just started operation in 2024. Am I required to submit DCR?

If your firm has no clients for 2024, your firm is only required to declare such status.

3. My firm has ceased operation. Am I required to submit DCR 2024 or declare non-applicability of DCR 2024?

If your business or company still legally exists, you need to make a declaration of non-applicability of DCR 2024 for your business or company (as either inactive or dormant).

Only if your firm no longer has any legal existence (i.e. struck off, dissolved or terminated registration of business), then your firm is not required to submit nor declare non-applicability of DCR 2024.

4. Does my firm need to submit one DCR for each of my clients?

The DCR is filled and submitted based on your firm's business (as a "reporting institution" under the AMLA) and not your clients'. Each firm who is an RI needs to submit one DCR.

5. Does my firm need to ensure all my clients who are also RIs to submit DCR?

No. The obligation to ensure that the DCR is submitted is on the RI and its own compliance officer.

6. If an RI qualifies as small-sized, is the RI exempted from the submission of the DCR?

No, small-sized RIs are still subjected to the DCR submission.

The simplification or exemption are only for selective AML/CFT requirements. This includes simplification on the conduct of employee screening and training and exemption of AML/CFT independent audit functions. Please refer to paragraph 11.1.1 of the Policy Document for more information on the exemptions and simplifications applicable to small-sized RIs.

7. What are the consequences or penalty for failure to submit the DCR?

Enforcement action can be taken on RIs who fail to submit the DCR within the stipulated timeline. Please ensure that all information provided in the DCR is complete and accurate to the best of your firm's knowledge.

GROUP OF COMPANIES / MULTIPLE PRACTISING CERTIFICATES

Given the different nature of business operations and customer profiles for each business activity, the DCR needs to be submitted separately for each company or practice areas. For instance:

Scenario	Submission Required
I am a Compliance Officer for a group of companies undertaking Gazetted Activities (GA) company secretarial and accounting services in separate entities (e.g. Firm A for company secretarial service, Firm B for accounting service). How many DCRs should I submit?	One DCR for each business activity/ entity.
[For DPMS] My group of companies have several entities operating in the same chain of business (e.g. one manufacturer, one wholesaler firm and one retailer firm). How many DCRs should I submit?	One DCR for each firm.
My firm is part of HQ with multiple branch offices. How should DCR be submitted?	For firms with multiple branch offices, submission is aggregated and by the head office only. However, if the branch office is operating independently from the head office and has its own compliance officer, then the branch office should respond to the DCR separately.
My group of companies have other RIs under the DNFBP sectors which are not required to submit DCR for 2024, do I need to submit or do any declaration of non-applicability of DCR 2024 for those RIs?	No. DCR 2024 is only applicable to the 5 DNFBP sectors. RIs of other DNFBP sectors are not required to submit DCR 2024 nor declare non-applicability of DCR 2024.
My firm provides both GA and non-GA services (e.g., conveyancing and litigation services by the same legal firm). What should my firm do?	For firms providing both GA and non-GA services, your firm is required to submit one DCR form only. Your firm is not required to declare under non-provision of GA. For firms providing non-GA ONLY, your firm needs to declare non-applicability of DCR 2024.

GROUP OF COMPANIES / MULTIPLE PRACTISING CERTIFICATES

Scenario	Submission Required
<p>My firm provides services under different sectors, e.g., accounting and company secretarial services or legal and company secretarial services. How many DCR should I submit, and which sector should I choose?</p>	<p>If the provision of services are under 1 firm, you may submit 1 DCR under the firm's core service.</p> <p>For example,</p> <ol style="list-style-type: none">1. Accounting services is the main services provided, please submit DCR under the accounting sector. Information related to company secretarial services can be included as GA V in Part B. The same applies to legal sector.2. Company secretarial services is the main services provided, please submit DCR under the company secretarial sector. Information related to accounting or legal services can be included as "other services" in Part B.

COMPLIANCE OFFICER (CO)

8. Does my firm need to appoint a CO prior to submitting the DCR?

Yes, RIs need to appoint a CO before attempting to respond to the DCR.

If you have yet to do so, please appoint your firm's CO and notify Bank Negara Malaysia (BNM) by filling an online form included in the portal or you may click [here](#).

9. What is CO number?

CO number is a unique number assigned to each Compliance Officer for communications with BNM on AML/CFT matters, including for reporting of STR. You will receive your CO number via the registered email after you have notified BNM on the appointment using the online form (or letter or manual form).

Please ensure that you have entered the correct sector and email address in the online form. Please note that CO number is unique to the firm. If you are the CO for multiple firms, you will receive a dedicated CO number for each of the firms.

10. If my firm has appointed CO and has notified the appointment to Bank Negara Malaysia previously, do we still need to fill up the CO Nomination Notification Form this year?

No, the CO number previously assigned to the CO of your firm is still valid and can be used to fill in the DCR 2024.

11. I am a sole proprietor with no employee. Can I appoint myself as the CO?

Yes.

12. If a firm has two COs representing different GA undertaken by the firm, should each of the CO submit his/her own DCR or both COs should issue only 1 DCR for the firm?

If the different GA fall under a single sector (e.g. both COs are lawyers carrying out GA of legal sector), only 1 DCR should be submitted by the firm.

13. If my firm is only required to declare our status, do we need to appoint a CO?

No. Your firm does not have to appoint a CO.

Please refer to the AML/CFT microsite on Compliance Officer at the following link:

<https://amlcft.bnm.gov.my/appointing-a-compliance-officer>



GAZETTED ACTIVITIES (GA)

14. Do we need to submit the DCR if we provide GA related service but do not hold money in the client's account?

Yes, DCR submission is required if your firm provides GA, regardless of whether the firm holds or does not hold clients' money in the client accounts.

15. My firm only commenced GA services in 2024. Do we need to submit DCR?

As the DCR submission is for transactions or activities for the year of 2022 and 2023, your firm is only required to make a declaration of non-applicability of DCR 2024.

However, as your firm has started providing GA and becomes an RI, your firm needs to comply with the relevant AML/CFT requirements moving forward.

16. What if my firm does not provide any GA, should my firm still submit the DCR?

No, but your firm is required to make a declaration of non-applicability of DCR 2024.

17. [For Accountants] I am not a member of MIA, but my firm provides accounting services. Does my firm need to submit DCR?

The DCR submission is on firm basis:

- If the accounting firm provides any of the listed GAs, the firm is required to submit the DCR 2024.
- However, if the accounting firm does not provide any of the listed GAs, the firm is required to make a declaration of non-applicability of DCR 2024.
- If the accounting firm does not have any accountants with practicing certificate from MIA, they are not an RI, and hence are not required to submit the DCR 2024 nor make a declaration of non-applicability of DCR 2024.

18. [For Accountants] My firm provides auditing services only. Do we need to submit DCR?

Accountants who provide audit service which does not fall within any of the 5 GAs are not RIs under the AMLA. As such, your firm is only required to make a declaration of non-applicability of DCR 2024.

19. [For registered estate agents] My firm provides valuation services only. Do we need to submit DCR?

Only registered estate agents who provide estate agency practice as defined in the Valuers, Appraisers, Estate Agents and Property Managers Act 1981 are RIs under the AMLA.

Hence, if your firm only carries out valuation services but not any of the estate agency practices, then your firm is not an RI under the AMLA. As such, your firm is only required to make a declaration of non-applicability of DCR 2024.

20. [For registered estate agents] Are the real estate negotiators in my firm required to submit DCR?

No. The submission is by the **registered estate agents**, at the firm level only.

FAQS ON PORTAL AND REGISTRATION

INVITATION CODE

1. What is an invitation code?

Invitation code was introduced as a measure to ensure that only nominated CO has access to the portal. For DCR 2024 submission, RIs are required to register as user in the DNFBP portal. Registration can only be done using this invitation code.

2. Where can I get the invitation code?

The invitation code will only be sent to the registered email of the CO after the appointment/ change of CO has been notified to BNM using the online form [here](#).

Please check the inbox, spam or junk mail of the registered email of the CO.

3. Why have I not received the invitation code?

It could be because your firm has not notified BNM on the appointment of your firm's CO. Please do so via the online form [here](#).

However, if your firm has already notified BNM on your CO but has yet to receive the invitation code, please email dcr@bnm.gov.my.

4. Why is my invitation code invalid?

It could be because you have redeemed your invitation code but did not complete the account registration process. Please email dcr@bnm.gov.my for assistance.

5. I am the CO for many firms, I have received multiple invitation codes for each of the firm. Which invitation code should I use?

Please use the latest invitation code that you received.

REGISTRATION

6. Where to register?

The DNFBP portal link, together with the invitation code is provided in the email sent to your firm's CO that was notified to BNM. Once you have entered the portal and keyed in the invitation code, click "Register" to register for access to DCR 2024. After creating a new username and password, you may continue to the DCR Dashboard to start filling up the DCR 2024 form.

Please refer to the [DCR Tutorial Videos](#) for more information.

7. What username and password should I use?

You may choose any username or password that you like, as long as the password meets the required criteria. However, please take note that once you have chosen your username you will not be able to change it.

REGISTRATION

8. **I have forgotten my username and password. How can I retrieve it?**
You may click "forgot password" in the sign in page. An email will be sent to the registered email of the CO (by default) to create a new password.
- However, there is no similar function for forgotten username. Please save the information of your username. To retrieve your username, please email dcr@bnm.gov.my.
9. **I am the CO for many firms, do I need to create new accounts for each firm?**
No. You only need one invitation code to create one account. You may submit DCR for all the firms using one account. For this purpose, you may use any of the invitation codes provided.
10. **If I have submitted for DCR 2020/2021/2022, do I still need to register for DCR 2024?**
No. You just need to log into the DNFBP portal with your existing username and password.

PORTAL FEATURES

11. **Is it possible for us to save as draft in the DNFBP portal?**
Yes. The DNFBP portal allows for saving of your drafts. Please ensure that you have clicked "Next & Save Draft" button in the DCR forms to save the answers on your current page.
12. **Can we print our drafts, submitted declaration form or submitted DCR form?**
Yes. You may print your drafts or submitted DCR form using the "Print" button. However, for declaration form, you will not be able to print the form once you have submitted. You may print the declaration form before clicking the "Submit" button.
13. **My account has been locked. How long does it take for my account to be unlocked?**
Your account will be locked for 15 minutes, you will be able to login after that.
14. **Can we submit the DCR in excel/ PDF format or via email?**
No. Submission for DCR 2024 can only be done through the DNFBP portal.
15. **Can the report card indicate the name of the firm?**
No. However, there is a reference number in the report card that matches your firm's submission in the dashboard of the DNFBP portal.

REPORTING CHECKLIST

Before starting the DCR, it is recommended that the reporting institution review and compile the following information or document beforehand to assist in responding to the DCR

PART A: Information on Reporting Institution

1. RI information (name, type/nature of business, registration/license number)
2. RI contact information (email, phone number, address)
3. Compliance Officer (CO) information
 - Co name and number
4. Local and foreign branch information
5. RI size:
 - Number of all employees (for DPMS)
 - Number of practising lawyers, accountants, company secretaries or real estate agents.
 - Number of practising lawyers, accountants or company secretaries carrying out Gazetted Activities
 - Number of real estate negotiators (for REAs)
6. Membership of association(s) (if any)

PART B: Business Information and Structure of RI

1. Transaction information for GA activities (where applicable), including total and breakdown (%) by type of product/services, for 2022 and 2023
 - Revenue / Value of transactions (RM)
 - Number of transactions
 - Value of cash transactions (RM)
2. Payment method by clients
3. Delivery channel (face-to-face and non-face-to-face)

PART C: ML/TF/PF Risk Assessment

1. Conduct of ML/TL/PF risk assessments by RI
 - Process or guidance available (e.g. manual or standard operating procedure [SOP])
 - Frequency of review
 - Risk ratings assigned to products, services, customers, etc. (if any)
 - Risk drivers / risk issues identified (if any)

REPORTING CHECKLIST

PART D: AML/CFT/CPF Programme

1. General Client Information
 - Total number of clients
 - Breakdown of client by types (e.g. individual, legal person, legal arrangement, and politically exposed person, clients in any alert lists, sanctioned/ specified person/ entity, clients with investigation orders issued)
 - Breakdown of client by nationality

2. RI AML/CFT/CPF standard operating procedures (SOP) or implementation manual, specifying the processes, procedures or policy for/ on:
 - Customer Due Diligence or Know Your Customer
 - Record keeping
 - Screening of clients against sanctioned persons/ entities lists
 - Risk profiling / risk rating for clients
 - Enhanced Due Diligence for higher risk customers (if any)
 - Ongoing Due Diligence (for repeat clients)
 - Reporting suspicious transaction (STR) and other STR related information (i.e. number of STR submitted or internally generated STR)
 - Storing clients' information and transactions records (electronic or manual)

3. RI AML/CFT/CPF Compliance Programme (applicable to large-sized firms) in relation to:
 - AML/CFT/CPF Policy & Procedures for implementation of compliance programme
 - Employee training on AML/CFT/CPF measures
 - Screening of employee
 - Competency and certification/training attended by Compliance Officer
 - Independent AML/CFT/CPF audit (where relevant)

4. Information on AML/CFT/CPF compliance system (if any)

GAZETTED ACTIVITIES

The following Gazetted Activities are applicable to lawyers/ notaries public, accountants (external) as stipulated under paragraph 3.3 of the Policy Document. Please note that examples cited below are **non-exhaustive**.



LAWYER/ NOTARIES PUBLIC



ACCOUNTANT

**GA
I**

Buying and selling of immovable property

Examples: (non-exhaustive)

- Advisory services related to buying and selling of real property
- Preparation of legal documents to facilitate buying and selling of immovable property
- Facilitating payments for buying and selling of immovable property

Organising of contributions for the creation, operation or management of companies

Examples/ explanation: (non-exhaustive)

- Advisory services related to capital contribution or funding/ financing arrangement of companies, e.g., initial public offerings (IPOs) or issuance of bonds
- Preparation of agreement related to funding / financing arrangement, e.g., IPOs or issuance of bonds
- Advisory services related to tax/ tax planning, investments in securities and/or other assets

**GA
IV**

**GA
II**

Managing of client's money, securities or other property

Examples/ explanation: (non-exhaustive)

- Hold or keep client monies/ funds/ assets in separate account (client/escrow account) and use the monies according to the client's instructions in conjunction with any of the specified GAs, e.g., holding of earnest deposit in firm's client account as stakeholder funds pending completion of property acquisition
- Administer and manage client assets in a separate account (client/escrow account), e.g., in relation to lawyer's role as a trustee for the administration of client's assets, tax payment to Inland Revenue Board on behalf of client.
- For lawyers, there could be circumstances of spill-over, in which the funds from litigation process may pass-through the client's account, and hence form part of the Gazetted Activities.

**GA
III**

Managing of accounts including savings and securities accounts

Examples: (non-exhaustive)

- Managing of client's accounts including bank accounts or securities accounts, e.g., acting as authorised signatory on behalf of client to facilitate funds transfer/salary payment from client's bank account to third party/employees, power of attorney over accounts
- Make investments on behalf of clients in securities and/or other assets
- Book-keeping and the preparation of annual and periodic accounts

Creating, operating or managing of legal entities or arrangements and buying and selling of business entities

Examples: (non-exhaustive)

- Formation or setting up of companies/ entities, including the related advisory services
- Formation or setting up of trust arrangement, including the related advisory services and preparation of trust deed
- Provision of shell or shelf companies, including the related advisory services
- Company secretarial or administrative services for new or existing companies/ entities
- Provision of nominee director/ shareholder services
- Takeover, mergers and acquisition arrangement, including the related advisory services and preparation of Share Sale Agreement
- Insolvency/ receiver-managers/ bankruptcy, including the related advisory services

**GA
V**

GAZETTED ACTIVITIES

The following Gazetted Activities are applicable to company secretaries (external) as stipulated under paragraph 3.3 of the Policy Document. Please note that examples cited below are **non-exhaustive**.



COMPANY SECRETARIES

**GA
I**

Act as a formation agent of legal entities

Examples: (non-exhaustive)

- Register or incorporate new companies with Companies Commission of Malaysia (CCM) or other registrar, where relevant

Provide a registered office, business address or accommodation, correspondence or administrative address for a company, a partnership, or any other legal entities or arrangement

Examples: (non-exhaustive)

- Provide or maintain a registered address for companies

**GA
III**

**GA
II**

Act as (or arrange for another person to act as) a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal entities

Examples: (non-exhaustive)

- Company secretarial services, including acting as director and the related advisory services
- Maintain statutory registers such as register of directors, register of members
- Administration of company related matters, e.g. file updates with CCM on changes of company name or address, issue of shares, changes in directors, shareholders, filing annual returns, making amendments to company constitution, drafting resolutions, organizing the company's board meetings and annual general meeting and prepare agendas and minutes, etc.

Act as (or arrange for another person to act as) a trustee of an express trust

Examples/ explanation: (non-exhaustive)

- Provide trustee services, including advisory, administration and management of trust

**GA
IV**

Act as (or arrange for another person to act as) a nominee shareholder for another person

Examples: (non-exhaustive)

- Arrange for person B to act as nominee shareholder for company JKW Sdn. Bhd. on behalf of person C, who is the actual owner of JKW Sdn. Bhd.

**GA
V**

DCR REPORTING GUIDE

PART A: Information on Reporting Institution

Information in this part is based on current business information, unless stated otherwise.

Questions are applicable to all sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
<p>A1 – A10</p>	<ul style="list-style-type: none"> • Sector • Firm name and contact details • Type of business <p>DEALER IN PRECIOUS METALS / PRECIOUS STONES (DPMS)</p> <p>LAWYER</p> <p>ACCOUNTANT</p> <p>COMPANY SECRETARY</p> <p>REGISTERED ESTATE AGENT (REA)</p>	<p>Choose your sector and type of business correctly from the drop-down list. Your choice of sector would determine the questions that you will need to answer throughout the DCR.</p> <p>Complete the RI's (firm) full name and contact details based on current details.</p> <p>For lawyers, please confirm whether you will be submitting the DCR 2024 on behalf of your branches. If 'Yes', please provide the number and location of your branches by postcodes.</p> <p>If 'No', please proceed to question 4.</p> <p>For question 4 in relation to firm identification, fill in business or company registration number (BRIC) issued by Companies Commission of Malaysia (CCM) or firm registration number issued by the authorities or your respective licensing authority or self-regulatory body.</p> <p>Please take note that the email address provided in question 5 will receive the DCR report card. Do check your spam or junk mail folder if it does not arrive in your inbox. If you do not receive the report card within 72 hours, please contact dcr@bnm.gov.my</p>
<p>A11</p>	<p>Your firm's AML/CFT/CPF Compliance Officer (CO) details</p>	<p>Please fill in your firm's CO name and number that has been provided to you.</p>

NO.	DCR QUESTION	GUIDANCE
A11	Your firm's AML/CFT/CPF Compliance Officer (CO) details (cont.)	<p>Appointment of CO is compulsory pursuant to section 19(4) of the AMLA and paragraph 11.5.13 of the Policy Document stipulates the requirement to notify BNM of the appointment.</p> <p>The roles of CO can be found here.</p>
A12	Does your firm have any local branch(es) within Malaysia	If 'Yes,' please provide the postcodes for the locations of the local branch(es).
A13- A13A	Are you part of DNFBP group or other DNFBP structure	<p>For question A13, you have to identify whether your firm is classified as a part of DNFBP group or other DNFBP structures.</p> <p>DNFBP group refers to a group that consists of a parent company incorporated in Malaysia or any other type of legal person exercising control and coordinating functions over the rest of the group, together with branches and/or subsidiaries that are subject to AML/CFT/CPF policies and procedures at the group level.</p> <p>Other DNFBP structures refers to DNFBP structures that do not operate like financial groups but share common ownership, management or compliance control as defined in the paragraph 6.2 of the Policy Document.</p> <p>Please select 'Yes' or 'No'.</p> <p>If 'Yes', please proceed to question 13A on the AML/CFT/CPF Compliance Programme implemented for the group or other DNFBP structure. Please refer to paragraph 13.1.2 of the Policy Document for the measures for the AML/CFT/CPF Compliance Programme.</p> <p>If your answer is 'No', proceed to question 14.</p>

NO.	DCR QUESTION	GUIDANCE
A14 - A14A	Does your firm have any formal international affiliation/ network/ association?	<p>International affiliation/network/association refers to formal arrangements with international firms to acquire a wider client reach. For example, collaboration between international law offices. This arrangement does not necessarily have to bind affiliated firms to refer cases to each other. This, however, does not constitute a branch and head office relationship.</p> <p>If 'Yes', please indicate the number of such arrangements that your firm has in question 14A.</p> <p>If 'No', please proceed to question 15.</p>
A15 - A15A	Does your firm have any international branch(es) and subsidiari(es) that carry on any activities listed in the First Schedule of AMLA?	<p>Any entities that carry on any activities listed in the First Schedule of AMLA is included in the 'Reporting Institutions (RI)'.</p> <p>You can check if your firm is a reporting institution here.</p> <p>If 'Yes', please select all the relevant location of the branches and subsidiaries from the list in question 15A. You can select more than one answer.</p>
A16	<p>DEALER IN PRECIOUS METALS / PRECIOUS STONES (DPMS)</p> <p>LAWYER</p> <p>ACCOUNTANT</p> <p>COMPANY SECRETARY</p> <p>REGISTERED ESTATE AGENT (REA)</p> <p>Number of (whichever is applicable) in your firm</p> <ul style="list-style-type: none"> • Lawyer 	<p>Please fill in the total number of the following, regardless of whether they provide Gazetted Activities or not:</p> <ul style="list-style-type: none"> • lawyer, accountant, company secretary who is practising; or • registered estate agent; or • employees (only applicable to DPMS)

NO.	DCR QUESTION	GUIDANCE
A16	<ul style="list-style-type: none"> • Practising accountant who is MIA member • Registered company secretary • Registered estate agent • Employees (only applicable to DPMS) <p>(cont.)</p>	
A16A	<div style="text-align: center; margin-bottom: 10px;"> <div style="background-color: #8e7cc3; padding: 5px; display: inline-block; border-radius: 10px;">LAWYER</div> <div style="background-color: #f0932b; padding: 5px; display: inline-block; border-radius: 10px;">ACCOUNTANT</div> <div style="background-color: #46a0c9; padding: 5px; display: inline-block; border-radius: 10px;">COMPANY SECRETARY</div> <div style="background-color: #4f81bd; padding: 5px; display: inline-block; border-radius: 10px;">REA</div> </div> <p>Number of (whichever is applicable) that provides Gazetted Activities (GA)</p> <ul style="list-style-type: none"> • Lawyer • Registered company secretary • Practising accountant who is a MIA member • Real estate negotiator (REN) 	<p>Please fill in the number of practising lawyers, company secretaries, accountants who provides GA services or real estate negotiators (REN) attached to your firm.</p> <p>Please refer to paragraph 3.3 of the Policy Document or page 13 and 14 of this Information Kit for reference and non-exhaustive examples of GAs.</p> <p>The total number should be as of 31 December 2023.</p>

NO.	DCR QUESTION	GUIDANCE
A17A - A17C	<div style="background-color: #f0e68c; padding: 5px; text-align: center; margin-bottom: 10px;"> DPMS </div> Nature of business and firms' business focus	<p>Choose your firm's nature and focus of business from the options provided.</p> <p>For question 17A, please select all types of business that your firm is involved in.</p> <p>For question 17C, if your firm deals with both B2B (business-to-business) and B2C (business-to-consumer), please state the % of your business contribution from these dealing.</p> <div style="background-color: #ffe6e6; padding: 10px; margin-top: 10px;"> <p>Note!</p> <p>For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> for 0.3% of business, please indicate as 1; for 30.7% of business, please indicate as 31; for 99.6% of business, please indicate as 99. </div> <div style="background-color: #e6e6ff; padding: 10px; margin-top: 10px;"> <p>Example:</p> <p>XYZ Jewellery mainly manufactures jewellerys for retail market. Occasionally or in some instances (around 10% of the sales), the firm also sells some of the jewellerys to consumer or referred individual clients. In this case:</p> <ul style="list-style-type: none"> For question 17A, you should select both manufacturer and jewellery retailer For question 17C, you should input 90 for B2B and 10 for B2C. </div>

NO.	DCR QUESTION	GUIDANCE
<p>A17 - A18</p>	<p style="text-align: center;">REA (A17)</p> <p style="text-align: center;">DPMS (A18)</p> <p>Is your firm a member of any industry associations?</p>	<p>If your firm is a member of any association within your sector, please select from the options provided. Multiple selection is allowed.</p> <p>If you select 'Others,' please specify the name of the association(s) in the column provided.</p>

PART B: Business Information and Structure

Information in this part is based on the entire business / operations of your firm in 2022/2023 in particular:

- Transaction information for GA activities (where applicable), including total and breakdown by type of product/services, for 2022 and 2023
- Revenue / Value of transactions (RM)
- Number of transactions
- Value of cash transactions (RM)
- Payment method by clients
- Delivery channel (face-to-face and non-face-to-face)
- Local and foreign branch information

Questions are applicable to all sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
B1	<p>(All sectors, where applicable)</p> <p>LAWYER</p> <p>ACCOUNTANT</p> <p>COMPANY SECRETARY</p> <p>DPMS</p> <p>REA</p> <ul style="list-style-type: none"> • Total revenue/fees (for each product/service) 	<p>Total revenue or total fees received for ALL activities (including non-GA activities, where applicable) for the year 2022 and year 2023 in question based on the following:</p> <ul style="list-style-type: none"> • Calendar year 1 January to 31 December of the specified year above; or • Audited or non-audited financial accounts for financial of the specified year above <p>For revenue, please include services which commenced OR still worked on between 1 January to 31 December of the specified year regardless of whether the said services were completed in OR after the said period.</p> <p>Please provide your firm's total revenue in whole number (e.g. 500 or 50000 or 5000000)</p>

NO.	DCR QUESTION	GUIDANCE														
B1A	Breakdown of total revenue (for each product/service)	<p>Please provide the breakdown of the total revenue for the year 2023 of each product and service in percentage (%).</p> <p>Note! For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. <p>Fill in 0 (zero) if there is no revenue for the particular product or service.</p> <p>Example: Accounting Firm XYZ Sdn. Bhd. conducts GA III and GA V activities only with no nominee services provided. GA III and GA V contributed to 29.5% and 70.2% of the total revenue, respectively.</p> <p>Thus, question 1A should be filled in as follows:</p> <table border="1" data-bbox="719 1415 1490 1906"> <tbody> <tr> <td>GA I</td> <td>0</td> </tr> <tr> <td>GA II</td> <td>0</td> </tr> <tr> <td>GA III</td> <td>30</td> </tr> <tr> <td>GA IV</td> <td>0</td> </tr> <tr> <td>GA V (exclude nominee services)</td> <td>70</td> </tr> <tr> <td>Nominee services</td> <td>0</td> </tr> <tr> <td>Non- GA</td> <td>0</td> </tr> </tbody> </table>	GA I	0	GA II	0	GA III	30	GA IV	0	GA V (exclude nominee services)	70	Nominee services	0	Non- GA	0
GA I	0															
GA II	0															
GA III	30															
GA IV	0															
GA V (exclude nominee services)	70															
Nominee services	0															
Non- GA	0															

NO.	DCR QUESTION	GUIDANCE								
B2	<p style="text-align: center;">LAWYER</p> <p style="text-align: center;">ACCOUNTANT</p> <p style="text-align: center;">COMPANY SECRETARY</p> <p style="text-align: center;">REA</p> <p style="text-align: center;">DPMS</p> <p>Total number of transactions</p>	<p>Please provide the total number of transactions for the year 2022 and year 2023, respectively in whole number.</p> <p>Transactions for each sector refers to the following:</p> <table border="1" data-bbox="719 584 1528 1216"> <tr> <td>Accountant</td> <td>Number of letter of engagements (LOE) issued or still attended to for GA activities only</td> </tr> <tr> <td>Company Secretary</td> <td>Number of bills or invoices issued for GA activities only</td> </tr> <tr> <td>Lawyer</td> <td>Number of file/ case/ matter newly opened or attended to for GA activities only</td> </tr> <tr> <td>DPMS & REA</td> <td>Number of invoices issued</td> </tr> </table>	Accountant	Number of letter of engagements (LOE) issued or still attended to for GA activities only	Company Secretary	Number of bills or invoices issued for GA activities only	Lawyer	Number of file/ case/ matter newly opened or attended to for GA activities only	DPMS & REA	Number of invoices issued
Accountant	Number of letter of engagements (LOE) issued or still attended to for GA activities only									
Company Secretary	Number of bills or invoices issued for GA activities only									
Lawyer	Number of file/ case/ matter newly opened or attended to for GA activities only									
DPMS & REA	Number of invoices issued									
B2A	<p>Breakdown of number of transactions (for each product/service)</p>	<p>Please provide the breakdown of the total transaction for the year 2023 of each product and service in percentage (%).</p> <p>Note! For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. <p>Fill in 0 (zero) if there is no revenue for the particular product or service.</p>								

NO.	DCR QUESTION	GUIDANCE												
B2A	Breakdown of number of transactions (for each product/service) (cont.)	<p>Example: Company Secretarial Firm ABC Sdn. Bhd. assists in the formation of companies, provide company secretarial services and some nominee services. The number of bills or invoices issued relating to these services are 19.7%, 70.3% and 10% respectively.</p> <p>Thus, question 2A should be filled in as follows:</p> <table border="1" data-bbox="719 712 1489 1391"> <tbody> <tr> <td>Incorporation of local entities</td> <td>20</td> </tr> <tr> <td>Assist in incorporation of entities outside of Malaysia</td> <td>0</td> </tr> <tr> <td>Provide secretarial services and/or registered office, business address or accommodation, correspondence or administrative address for a company, a partnership, or any other legal entities or arrangement</td> <td>70</td> </tr> <tr> <td>Act as (or arrange for another person to act as) a trustee of an express trust</td> <td>0</td> </tr> <tr> <td>Nominee director/shareholder services</td> <td>10</td> </tr> <tr> <td>Other services</td> <td>0</td> </tr> </tbody> </table>	Incorporation of local entities	20	Assist in incorporation of entities outside of Malaysia	0	Provide secretarial services and/or registered office, business address or accommodation, correspondence or administrative address for a company, a partnership, or any other legal entities or arrangement	70	Act as (or arrange for another person to act as) a trustee of an express trust	0	Nominee director/shareholder services	10	Other services	0
Incorporation of local entities	20													
Assist in incorporation of entities outside of Malaysia	0													
Provide secretarial services and/or registered office, business address or accommodation, correspondence or administrative address for a company, a partnership, or any other legal entities or arrangement	70													
Act as (or arrange for another person to act as) a trustee of an express trust	0													
Nominee director/shareholder services	10													
Other services	0													

NO.	DCR QUESTION	GUIDANCE
B2B - B2Bi	<div style="background-color: #8e7cc3; color: white; padding: 5px; text-align: center; font-weight: bold; margin-bottom: 10px;">LAWYER</div> <ul style="list-style-type: none"> Total value of transactions Breakdown of total value of transactions (for each product/service) 	<p>Value of transaction refers to the value of deals or services facilitated or attended by the law firm in 2022 and 2023 for GA activities. This excludes legal fees and other reimbursement such as stamp duty, registration fees, etc.</p> <p>For example, for a sale and purchase of a property, the value of the transaction would be the purchase price of the property.</p> <p>Please provide your answers in whole number for both year of 2022 and 2023 without decimals e.g. 500177</p> <p>Please proceed to provide the breakdown of value of transaction for each services that your firm offers in percentage (%).</p> <div style="background-color: #f8cbad; padding: 10px;"> <p>Note! For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> for 0.3% of business, please indicate as 1; for 30.7% of business, please indicate as 31; for 99.6% of business, please indicate as 99. <p>Fill in 0 (zero) if there is no payment is made through the particular method.</p> </div>

NO.	DCR QUESTION	GUIDANCE
B3	<p style="text-align: center;">LAWYER</p> <p style="text-align: center;">ACCOUNTANT</p> <p style="text-align: center;">COMPANY SECRETARY</p> <p style="text-align: center;">REA</p> <p style="text-align: center;">DPMS</p> <p>How do clients make payment to your firm (breakdown in %)?</p>	<p>This refers to the methods of payment used by your clients in 2022 and 2023.</p> <p>Please fill in the breakdown in % for each method of payment for GA activities, where applicable, as follows:</p> <ul style="list-style-type: none"> • Cash (including physical cash notes payment and cash payment deposited into the cash deposit machine (CDM)/ over the counter into RI's account). For DPMS, for this category, cash excludes gold. • Cheque • Telegraphic Transfer (TT)/ Bank Transfer into firm's account • Debit Card/ Credit Card • E-Wallet/ e-money • Gold (only applicable to DPMS only) <p>If there are other methods than what is listed above, please specify in the column provided.</p> <div style="background-color: #ffe6e6; padding: 10px;"> <p>Note! For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. <p>Fill in 0 (zero) if there is no payment is made through the particular method.</p> </div>

NO.	DCR QUESTION	GUIDANCE				
B4	<p>Total value (in RM) of all cash transactions (inward and outward payments).</p> <p>LAWYER</p> <p>ACCOUNTANT</p> <p>COMPANY SECRETARY</p> <p>REA</p> <p>DPMS</p>	<p>Please select the appropriate range from the dropdown for year 2022 and year 2023 each.</p> <p>Cash transactions cover both inward and outward payments. Cash transactions include (please see paragraph 6.2 of the Policy Document):</p> <ul style="list-style-type: none"> • bank notes and coins to the RI or into a bank account of the RI (via counter or CDM); • bearer negotiable instruments including traveller's cheques, vouchers and others but exclude bank drafts, cheques, and electronic transfers; and/ or • precious metals and/or precious stones, including gold trade-ins. <p>Cash transactions for GA activities, where applicable, should exclude operational expenses such as payroll, bills, finance expenses and dividend payment.</p> <p>For purchase of property, money released from bank loans straight into the firm's or vendor's accounts for initial or subsequent payments is not considered as cash transaction.</p> <p>Inward and outward cash payments should be aggregated.</p> <p>Example:</p> <table border="1" data-bbox="719 1597 1528 1823"> <tbody> <tr> <td>Cash received by the firm (inward payment)</td> <td>RM500,000</td> </tr> <tr> <td>Cash paid by the firm (outward payment)</td> <td>RM10,000</td> </tr> </tbody> </table> <p>Therefore, total cash transaction of the firm is RM510,000.</p> <p>As such, please select the following answer option:</p> <p>RM500,000 - < RM1 mil</p>	Cash received by the firm (inward payment)	RM500,000	Cash paid by the firm (outward payment)	RM10,000
Cash received by the firm (inward payment)	RM500,000					
Cash paid by the firm (outward payment)	RM10,000					

NO.	DCR QUESTION	GUIDANCE														
B4A	<p style="text-align: center;">DPMS</p> <p>Breakdown of cash transactions</p>	<p>For question 4A, please provide the breakdown in % for all CASH transactions based on the range listed below:</p> <ul style="list-style-type: none"> • RM4,999 and below; • RM5,000 – RM9,999; • RM10,000 – RM24,999; • RM25,000 – RM49,999; • RM50,000 – RM74,999; • RM75,000 – RM99,999; and • RM100,000 and above. <p>Note!</p> <p>For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.</p> <p>Round off to the nearest number, for example:</p> <ul style="list-style-type: none"> • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. <p>Fill in 0 (zero) if there is no cash transaction for that particular range.</p> <p>Example:</p> <p>DPMS firm LMN Jewellery has 100 cash transactions, 80% are below RM4,800 and 20% are within the range of RM15,000- RM20,000.</p> <p>Based on the above, please fill in question 4A as follows</p> <table border="1" data-bbox="719 1630 1517 2119"> <tbody> <tr> <td>RM4,999 and below</td> <td style="text-align: center;">80</td> </tr> <tr> <td>RM5,000 – RM9,999</td> <td style="text-align: center;">0</td> </tr> <tr> <td>RM10,000 – RM24,999</td> <td style="text-align: center;">20</td> </tr> <tr> <td>RM25,000 – RM49,999</td> <td style="text-align: center;">0</td> </tr> <tr> <td>RM50,000 – RM74,999</td> <td style="text-align: center;">0</td> </tr> <tr> <td>RM75,000 – RM99,999</td> <td style="text-align: center;">0</td> </tr> <tr> <td>RM100,000 and above</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>	RM4,999 and below	80	RM5,000 – RM9,999	0	RM10,000 – RM24,999	20	RM25,000 – RM49,999	0	RM50,000 – RM74,999	0	RM75,000 – RM99,999	0	RM100,000 and above	0
RM4,999 and below	80															
RM5,000 – RM9,999	0															
RM10,000 – RM24,999	20															
RM25,000 – RM49,999	0															
RM50,000 – RM74,999	0															
RM75,000 – RM99,999	0															
RM100,000 and above	0															

NO.	DCR QUESTION	GUIDANCE
B5 - B6	<p style="text-align: center;">LAWYER</p> <p style="text-align: center;">ACCOUNTANT</p> <p style="text-align: center;">COMPANY SECRETARY</p> <p style="text-align: center;">REA</p> <p>Does your firm assist for domestic overseas transaction?</p>	<p>Question 5 refers to overseas transactions facilitated on behalf of domestic clients.</p> <p>This includes the following: (non-exhaustive)</p> <ul style="list-style-type: none"> assist/ facilitate clients to purchase properties outside of Malaysia (lawyers, REA) assist / facilitate clients to incorporate companies outside of Malaysia <p>Question 6 relates to assisting foreign clients (residing or based in overseas) for any services / transactions in Malaysia, for example:</p> <ul style="list-style-type: none"> assist/ facilitate clients residing overseas for services in Malaysia, but execution of agreement/ transaction is being conducted outside of Malaysia, assisted by RI abroad. act as nominees for foreign firms who want to incorporate locally in Malaysia.
B7 & B8	<p>Does your firm have any clients who you do not meet at all throughout the business relationship (i.e. non-face-to-face clients)?</p>	<p>Non-face-to-face means that you do not engage physically with the clients at all during on-boarding and throughout the business relationship, such as through mobile apps or online transaction.</p> <p>Examples of non-face-to-face interactions include, (but are not limited to), phone call, video call, mobile applications, or website/ e-commerce platform.</p> <p>If you have answered 'Yes' for question B7, question B8 requires you to determine by % the total number of clients engaged through non-face-to-face methods from the dropdown provided.</p>

PART C: AML/CFT/CPF Risk Assessment

Information in this part is based on current process, practice, or assessment of the firm, unless otherwise stated.

The ML/TF/PF risk assessment is an exercise to identify, assess and understand the MT/TF/PF risks faced by your firm, by considering the following risk factors:

- customer risk
- product /services risk
- geographical location
- delivery channels

Questions are applicable to all sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
C1 - C1A	Has your firm conducted any ML/TF/PF risk assessments on its own business?	<p>If your firm has undertaken any sort of ML/TF/PF risk assessments, please select the appropriate answer from the dropdown menu/ list.</p> <p>If you have answered any of the 'Yes' answers in question 1, then proceed to answer on the frequency of the risk assessment in question 2.</p> <p>If you have answered 'No', please choose the appropriate answer on why it was not conducted in question 1A from the dropdown provided or you may specify your reason and that is the end of Part C, and you may proceed to Part D.</p>
C2	How often does your firm conduct/review the ML/TF/PF risk assessment on your own business?	Please select the relevant frequency of the ML/TF/PF risk assessment conducted by your firm from the selection.
C3A - C3B	If your firm has undertaken ML/TF risk assessments, what is each of the ML and TF risk rating level for each risk factor?	<p>If your firm conducted ML/TF risk assessments, please select the corresponding ML and TF risk rating level (i.e., Low, Medium, High) for each risk factor.</p> <p>There are four types of risks to be considered by RIs:</p> <p>i. Customer risk</p> <p>Firm's exposure to different types of clients including their nationality, exposure to politically exposed person (PEP) clients, occupation for individual clients or nature of business for corporate clients, or other risk factors.</p>

NO.	DCR QUESTION	GUIDANCE
		<p>ii. Product and services risk</p> <ul style="list-style-type: none"> • Nature and complexity of the products/ services offered by the firm • For example, whether products are easily transferable/ not easily traceable/ exchanged/ high value, services allow payment from third-party/ unknown parties, able to conceal beneficial ownership, services that include creation/ setting up of complex legal structures, etc. <p>iii. Transaction/ Delivery Channel risk</p> <ul style="list-style-type: none"> • Whether any product/ service is offered via non-face-to-face channels by your firm as they are more susceptible to ML/TF as compared to face-to-face channels • Cash intensity of the business (i.e. whether your firm conducts a lot of cash transactions) • Method of payment which may be more susceptible to ML/TF risks <p>iv. Geographical risk</p> <p>Geographical location of the RIs' holding company, head office, branches, subsidiaries, and agents, if any.</p> <p>If your firm's assessments do not consider any of the above specified risk factors, please choose 'Not Assessed' from the selection.</p>

PART D: AML/CFT/CPF Programme

Questions in this part are based on your firm's **current** process, practice on client or transactions relating to (i) activities regulated under the AMLA; or (ii) meets the Customer Due Diligence (CDD) threshold specified for DPMS. Responses would determine the understanding and/ or compliance of the RI on the AML/CFT/CPF requirements.

NO.	DCR QUESTION	GUIDANCE
D1	<p>Provide the total number of clients of your firm for Gazetted Activities (GA)</p> <div style="display: flex; flex-direction: column; gap: 10px; margin-top: 20px;"> <div style="background-color: #8e7cc3; color: white; padding: 5px; text-align: center; border-radius: 5px;">LAWYER</div> <div style="background-color: #f0932b; color: white; padding: 5px; text-align: center; border-radius: 5px;">ACCOUNTANT</div> <div style="background-color: #46a0c9; color: white; padding: 5px; text-align: center; border-radius: 5px;">COMPANY SECRETARY</div> <div style="background-color: #4f81bd; color: white; padding: 5px; text-align: center; border-radius: 5px;">REA</div> <div style="background-color: #f0e68c; color: black; padding: 5px; text-align: center; border-radius: 5px;">DPMS</div> </div>	<p>Please fill in the total <u>whole number</u> of clients of your firm for Gazetted Activities (where applicable). For REA, please provide the firm's total number of clients for this question.</p> <p>For DPMS, please select 'Yes' or 'No' if your firm has any clients that transact in cash of RM50,000 and above.</p> <ul style="list-style-type: none"> If 'Yes', please indicate the total clients that transacted in cash for RM50,000 and above for year 2023. If 'No', please indicate if your firm collects information on client's identity. You may then proceed to question 11. <p>You must provide your answer for year 2022 and 2023.</p>
D1A - D1Bi	<p>Provide the breakdown (%) of total number of each Malaysian and non-Malaysian clients for each category, where applicable.</p>	<p>Please fill in the breakdown by % of clients for each of the following category (if any) for Malaysian client in question 1A and non-Malaysian client in question 1Bi for 2023 only.</p> <ul style="list-style-type: none"> Individual Sole proprietors, partnerships, limited liability partnerships, companies Government-linked companies (GLC)/ state owned corporations (SOC) Societies, foundations, associations i.e. CLBG and Non-profit organisations (NPO) Legal arrangements e.g trusts

NO.	DCR QUESTION	GUIDANCE
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D1A -
D1Bi

Provide the breakdown (%) of total number of each Malaysian and non-Malaysian clients for each category, where applicable. (cont.)

Note!

For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.

Round off to the nearest number, for example:

- for 0.3% of business, please indicate as 1;
- for 30.7% of business, please indicate as 31;
- for 99.6% of business, please indicate as 99.

Fill in 0 (zero) if the category is not applicable

Example:

Accounting Firm XYZ Sdn. Bhd. provided Gazetted Activities to 1,000 clients in 2023, with the following breakdown:

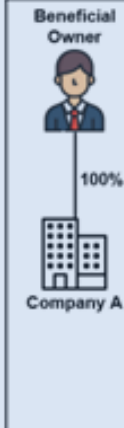
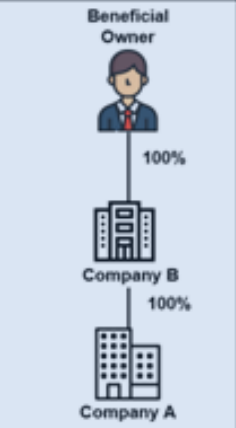
500 sole proprietorships
 200 limited liability partnerships
 300 companies, of which 10 are GLCs

- For question 1, please fill in '1000'
- Fill up the % breakdown for category of Malaysian clients under question 1A and category of non-Malaysian clients under question 1Bi (if any), as follows:

Individuals	0
Sole proprietorships, partnerships, limited liability partnerships, companies	99
GLC, SOC	1
Societies, foundation, association i.e. CLBG and Non-Profit Organisations (NPOs)	0
Legal arrangements	0

NO.	DCR QUESTION	GUIDANCE
D1A - D1B(i)	Provide the breakdown (%) of total number of each Malaysian and non-Malaysian clients for each category, where applicable. (cont.)	<ul style="list-style-type: none"> • Companies incorporated in Malaysia with foreign shareholders (or foreign beneficial owners) are considered as Malaysian client. • Companies incorporated outside of Malaysia and/or operating and/or registered (as foreign company) in Malaysia are considered as non-Malaysian client. • If your firm has non-Malaysian clients, please proceed to select the countries of all the non-Malaysian clients.
CUSTOMER DUE DILIGENCE		
D2A - D2B	Information collected (for identification) and verification (through document/ electronic data) of individual clients, person conducting transaction and beneficial owners	<p><i>This question is dependent on whether you have indicated a certain percentage of individual clients in question 1.</i></p> <p>CDD is the process of identifying and verifying (using reliable and independent documentation including electronic data) the identity of your clients, persons conducting the transaction (PCT) as well as beneficial owners (BO). For more information, please refer to the infographic on CDD which can be accessed here. Please also refer to the requirement on CDD in paragraph 14 of the Policy Document, which can be accessed here.</p> <p>For question 2A, please select from the list all relevant information that your firm obtains / collects to identify your individual clients, PCT or BO.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed <p>For question 2B, please select from the list the type of information, electronic data or documents (if any) that you use to verify the identity of your clients, PCT or BO.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you rely on any other documents that are not listed

NO.	DCR QUESTION	GUIDANCE
D3A - D3C	Information collected and verification of corporate and business clients (including foreign corporate clients)	<p><i>This question is dependent on whether you have indicated a certain percentage of corporate clients in question 1.</i></p> <p>For question 3A, please select from the list, all relevant information that your firm obtains / collects to identify your corporate clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed <p>For question 3B, please select from the list the type of information, electronic data or documents (if any) that you use to verify the identity of your corporate clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you rely on any other documents that are not listed. <p>For question 3C, please select from the list the type of information, electronic data or documents (if any) that you use to verify the identity of your foreign corporate clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you rely on any other documents that are not listed.
D4 - D4B	Identification and information collected on beneficial owner of corporate clients	<p><i>This question is dependent on whether you have indicated a certain percentage of corporate clients in question 1.</i></p> <p>Beneficial owner refers to any natural person(s) who ultimately owns or controls a client and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.</p>

NO.	DCR QUESTION	GUIDANCE
D4 - D4B	Identification and information collected on beneficial owner of corporate clients (cont.)	<p>As provided in paragraph 14.10.6 of the Policy Document, RIs should identify the beneficial owners of legal persons through the steps provided in the Policy Document (an example is provided below).</p> <p>For example:</p> <div style="display: flex; align-items: flex-start;"> <div style="flex: 1;">  <p>[left diagram] Direct ownership</p> </div> <div style="flex: 1;">  <p>[right diagram] Indirect ownership. If Company A is legally owned by Company B (according to its corporate registration information), the beneficial owners are the natural persons behind the Company B (or behind the ultimate holding company in the chain of ownership).</p> </div> </div> <p>For more information, please refer to the Guidance on Beneficial Ownership which can be accessed here.</p> <p>For question 4, please select 'Yes' or 'No' if your firm identify who is the individual or beneficial owner that directly or indirectly owns or control the business/entity</p> <ul style="list-style-type: none"> • If 'Yes', please proceed to questions 4A & 4B • If 'No', please proceed to the next relevant question <p>For question 4A, please select from the list on how your firm check/ obtain information to verify the identity of the beneficial owner of your corporate clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. <p>For question 4B, please select 'Yes', 'No' or 'Partially', if your firm verify all layers of corporate shareholding of your corporate clients to know who is the ultimate beneficial owner.</p>

NO.	DCR QUESTION	GUIDANCE
D5A - D5C	Information collected and verification of legal arrangement clients	<p><i>This question is dependent on whether you have indicated a certain percentage of legal arrangement clients in question 1.</i></p> <p>For question 5A, please select from the list all relevant information that your firm obtains/ collects to identify your legal arrangement clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed <p>For question 5B, please select from the list the type of information, electronic data or documents (if any) that you use to verify the identity of your legal arrangement clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you rely on any other documents that are not listed <p>For question 5C, please select from the list the type of information, electronic data or documents (if any) that you use to verify the identity of your foreign legal arrangement clients.</p> <ul style="list-style-type: none"> • You may select more than one answer. • Please specify if you rely on any other documents that are not listed
D6	Has your firm conducted delayed verification?	<p>RIs can delay verification only when ML/TF/PF risk is assessed as low, and verification is not possible at the point of establishing the business relationship.</p> <p>You may refer to paragraphs 14.10.21 to 14.10.25 of the Policy Document for more details on delayed verification.</p>

NO.	DCR QUESTION	GUIDANCE
D6	<p>Has your firm conducted delayed verification? (cont.)</p>	<p>Please select 'Yes' or 'No'. If your firm has conducted delayed verification previously, you are required to provide the time taken to complete the delayed verification. Please select the answer which is most relevant to your firm's practice.</p> <p>For professional services & REAs, delayed verification relates to the following:</p> <ul style="list-style-type: none"> • After offer is made • After transaction begin <p>For DPMS delayed verification is after payment is made and receipt is issued.</p>
D7	<p>Has your firm relied on CDD conducted by other reporting institutions (RIs)?</p>	<p>If 'Yes', please specify the sector of the third party RI.</p> <p>RIs are allowed to rely on other RIs or third parties for purposes of CDD, as provided under paragraph 16 of the Policy Document.</p> <p>These other RIs or third parties refer to RIs that are supervised by a relevant competent authority and meets the requirements under paragraph 16 of the Policy Document.</p> <p>This includes RIs such as banks, insurance companies, company secretaries, foreign banks, etc. This does not include outsourcing or agency relationships.</p>

NO.	DCR QUESTION	GUIDANCE
SANCTIONS SCREENING		
<p>D8 - D8C</p>	<p>What are the sanctions lists maintained by your firm?</p>	<p>Maintaining sanctions lists and screening of all new and existing clients against these lists are part of the AML/CFT/CPF requirements.</p> <p>For question 8, please choose the relevant sanctions list that your firm maintains.</p> <ul style="list-style-type: none"> You may select more than one answer. If you do not maintain any of the lists, select 'None of the above'. <p>Question 8A asks how your firm screens your clients against the sanctions lists. Please choose the most relevant answer based on your firm's practice. Your firm may use/subscribe to external screening platform in conducting screening on your clients.</p> <p>In question 8B, please indicate if your firm has any client or potential client who are sanctioned individuals or entities.</p> <ul style="list-style-type: none"> If 'Yes', please specify the number of sanctioned individuals or entities that your firm has and proceed to question 8Bi. If 'No', please proceed to question 8C. <p>In question 8Bi, please select the relevant process/procedures in place, in the event of any match from the sanctions lists that you maintain, or when dealing with sanctioned individuals or entities (as indicated in question 8B).</p> <ul style="list-style-type: none"> You may select more than one answer. <p>In question 8C, please select the most relevant answer on whether your firm puts in place relevant process and procedures when dealing with confirmed sanctioned client/ potential client who is on the sanctions list.</p> <p>You may refer to the Policy Document for links to the relevant sanctions lists.</p>

NO.	DCR QUESTION	GUIDANCE
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CUSTOMER RISK PROFILING / ENHANCED DUE DILIGENCE		
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<p>D9 - D9E</p>	<p>Does your firm assess the ML/TF risk of your clients?</p>	<p>Risk profiling of clients is conducted during customer on-boarding. Please choose 'Yes' or 'No' on whether your firm conducts customer risk profiling.</p> <p>If 'No', proceed to question 9A to answer on why the risk profiling of clients was not conducted. You may choose more than one answer from the selection. Proceed to question 10.</p> <p>If 'Yes', proceed to answer questions 9A, 9B, 9C, 9D, and 9E.</p> <ul style="list-style-type: none"> • Question 9A relates to the type of process used when conducting risk profiling on clients. <ul style="list-style-type: none"> ➔ Assessment form may refer to manual form developed by your firm internally or use of template provided in the Policy Document. ➔ Client risk profiling model/ system may include usage of any in house or off-the-shelves models or excel to assist automated risk profiling of clients. ➔ Informal assessment may include assessment or decision by senior management/ partner/ owner on the ML/TF/PF risks of the clients. However, these assessments are often not documented. ➔ Please select the most accurate answer relevant to your firm's practice. • Question 9B relates to the risk factors considered when rating your clients: <ul style="list-style-type: none"> ➔ Please choose from the selection provided (customer risk, products and services risk, transaction risk/ delivery channel, geographical risk). Please refer to guidance under question C3A-C3B on examples for each of these factors. ➔ You may choose more than one answer.
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NO.	DCR QUESTION	GUIDANCE					
D9-D9E	Please specify if there are other types of clients that your firm is exposed to	<ul style="list-style-type: none"> Question 9C relates to the type of clients from the following category that your firm is exposed to: <ul style="list-style-type: none"> Domestic politically exposed persons (PEP) Foreign PEP Clients who are listed under the alert list issued by authorities Clients with investigation orders ➡ Please refer to the definition provided in the Policy Document for 'politically exposed persons'. While there is no definitive list provided for PEPs, RIs are to develop its own list based on the definition provided. ➡ Please choose from the selection provided for each category mentioned above: <table border="1" data-bbox="869 1030 1516 1377"> <tr> <td>Yes, < 10% of my firm's total clients</td> </tr> <tr> <td>Yes, 10% - < 20% of my firm's total clients</td> </tr> <tr> <td>Yes, ≥ 20% of my firm's total clients</td> </tr> <tr> <td>No</td> </tr> <tr> <td>Cannot be identified</td> </tr> </table> ➡ Please specify if there are other types of clients that your firm is exposed to. Question 9D determines whether your firm asks for more information before accepting higher ML/TF risks clients. <ul style="list-style-type: none"> ➡ Please select 'Yes', 'No' or 'Not Applicable' Question 9E relates to whether approval from senior management/owner/partner is obtained before accepting higher ML/TF/PF risks clients. <ul style="list-style-type: none"> ➡ Please select 'Yes', 'No' or 'Not Applicable' 	Yes, < 10% of my firm's total clients	Yes, 10% - < 20% of my firm's total clients	Yes, ≥ 20% of my firm's total clients	No	Cannot be identified
Yes, < 10% of my firm's total clients							
Yes, 10% - < 20% of my firm's total clients							
Yes, ≥ 20% of my firm's total clients							
No							
Cannot be identified							

NO.	DCR QUESTION	GUIDANCE
ON-GOING DUE DILIGENCE		
D10 - D10A	Does your firm monitor and review clients' transactions and update clients' information?	Choose 'Yes' or 'No' if your firm monitor and review clients' transactions, or update clients' information throughout the business relationship. This includes updating CDD documents, data or information of clients.
RECORD KEEPING		
D11 – D11B	Does your firm keep copies of all transaction records of clients?	<p>Question 11 relates to whether copies of documents used during the identification and verification process of clients are kept by your firm.</p> <p>Question 11A relates to whether your firm keep copies of all transaction records of your clients. These include receipts, agreements and invoices.</p> <p>For questions 11 and 11A, please choose 'Yes', 'No' or 'Partially', based on your firm's practice.</p> <p>If the records are kept, proceed to question 11B on the period of records being kept. Please select the answer that is most relevant to your firm's practice.</p>
MANAGEMENT INFORMATION SYSTEM		
D12 - D12A	How does your firm maintain and centralise clients' information (also known as management information system, MIS)?	<p>MIS refers to any system used by your firm to store clients' information and transactions records. Please choose the most relevant answer from the selection in question 12.</p> <p>MIS does not necessarily have to be digitalised or computerised. MIS can be in a manual form as long as MIS adopted by the firm is capable of aggregating client's transactions from multiple accounts/files and/or across all branches. And more importantly, can pick up any anomalies in the transactions.</p>

NO.	DCR QUESTION	GUIDANCE
D12 - D12A	How does your firm maintain and centralise clients' information (also known as management information system, MIS)? (cont.)	<p>Question 12A relates to whether your firm's MIS can do the above, please select 'Yes', 'No' or 'Partially'.</p> <p>Examples of an electronic MIS:</p> <ul style="list-style-type: none"> • In-house/ off-the-shelves accounting/ centralised data management system. • Excel or any database software. <p>Example of a manual MIS:</p> <ul style="list-style-type: none"> • Hardcopy files and centralised filing system.
SUSPICIOUS TRANSACTION REPORTS (STR)		
D13 – D13B	Existence of identified relevant triggers, conditions or scenario (also called red flags) to help indicate that a transaction is suspicious?	<p>To detect suspicious transactions, does your firm, either documented or not documented, have any scenarios or criteria (red flags) to identify whether a client or a transaction may be suspicious? Please select the relevant answers for your firm in question 13.</p> <p>If 'Yes', proceed to question 13A on whether the identified red flags are provided to all the staff/employees of the firm.</p> <p>Do note that you can also refer and obtain the common or sector-specific red flags in the Policy Document, as a guidance in identifying your firm's red flags. (See Appendix 14 of the Policy Document).</p> <p>Suspicious transactions should be reported to BNM whenever the RI suspects that the transaction (including attempted or proposed), regardless of the amount:</p> <ul style="list-style-type: none"> • appears unusual; • has no clear economic purpose; • appears illegal; • involves proceeds from an unlawful activity or instrumentalities of an offence; or • indicates that the client is involved in ML/TF.

NO.	DCR QUESTION	GUIDANCE
D13 – D13B	Existence of identified relevant triggers, conditions or scenario (also called red flags) to help indicate that a transaction is suspicious? (cont.)	<p>(See requirements in section 14(1) of the AMLA and Paragraph 19 of the Policy Document)</p> <p>In question 13B, firms are required to indicate whether there are procedures in place in relation to submission of STR to BNM. Please select ‘Yes’ or ‘No’.</p> <p>The procedures refer to:</p> <ul style="list-style-type: none"> • procedures to channel internal STR from employee to the CO; • duration of time for the CO to review the internal STR; and • duration of time for the CO to submit an STR to BNM, upon confirmation of suspicion.
D14 - D14B	Has your firm reported any STRs to BNM?	<p>For question 14, please indicate who decides to submit STR to BNM for your firm, either through mail, email or FINS (Financial Intelligence System) platform.</p> <p>For question 14A, please select ‘Yes’ or ‘No’, whether your firm has reported any STR to BNM in 2023.</p> <p>If you answer yes to 14B, BNM would like to understand further on the possible challenges faced by the RIs in reporting STR to BNM. Please provide the reason that is most relevant to your firm. You may select more than one option.</p>

NO.	DCR QUESTION	GUIDANCE
COMPLIANCE OFFICER (CO) FUNCTION		
<p>D15 - D15B</p>	<ul style="list-style-type: none"> • AML/CFT/CPF Training • AML/CFT/CPF Certification 	<p>Please choose all applicable answers from the selection provided on the following:</p> <ul style="list-style-type: none"> • Attended any AML/CFT/CPF training <ul style="list-style-type: none"> ➔ e.g. webinars organised by: <ul style="list-style-type: none"> • BNM; • licensing authority (e.g. Companies Commission of Malaysia); • self-regulatory bodies (e.g. Bar Council Malaysia or Malaysian Institute of Accountants);or • industry associations (e.g. MAICSA, FGJAM (Federation of Goldsmith and Jewellers Association of Malaysia) etc). ➔ conferences or forums relating to AML/CFT/CPF matters, etc); or • Obtained any AML/CFT/CPF certification <ul style="list-style-type: none"> ➔ for example, <ul style="list-style-type: none"> • Certified Anti-Money Laundering Specialist from the Association of Certified Anti-Money Laundering Specialist (ACAMS) • Certified Anti-Money Laundering & Counter Financing of Terrorism Compliance Officer (CAMCO) from the AICB (Asian Institute of Chartered Bank) • or any other programme <p>Do note that obtaining certification is a best practice, which is encouraged and not a mandatory requirement under the Policy Document.</p>

NO.	DCR QUESTION	GUIDANCE
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AML/CFT/CPF COMPLIANCE PROGRAMME

GENERAL INFORMATION

AML/CFT/CPF Compliance Programme consists of several requirements as follows:

Policies, Procedures and Controls
(paragraph 11.2 of the Policy Document)

Employee Training & Awareness Programme
(paragraph 11.8 of the Policy Document)

Employee Screening Procedures
(paragraph 11.7 of the Policy Document)

Independent Audit Function
(paragraph 11.9 of the Policy Document)

Question 16-19
Only applicable for
LARGE-SIZED RIs

Proceed to Question 20
for SMALL-SIZED RIs

- Please refer to the Policy Document for full details on AML/CFT/CPF compliance programme.
- Select what is relevant to the practice of your firm.
- Small-sized RIs are subject to the application of simplification or exemption of Compliance Programme requirements, pursuant to paragraph 11.1 of the Policy Document.

POLICIES, PROCEDURES & CONTROLS

<p>D16 - D16C</p>	<p style="text-align: center;">LARGE-SIZED FIRMS</p> <p>Does your firm have written AML/CFT/CPF policies, procedures and controls?</p>	<p>In question 16, please indicate if your firm has established written AML/CFT/CPF policies, procedures and controls.</p> <ul style="list-style-type: none"> • If 'Yes', proceed to questions 16A, 16B and 16C. • If 'No', proceed to question 17. <p>For question 16A, please indicate whether the policies are approved by your Senior Management and Board of Directors or senior partners (in the case of partnership).</p> <ul style="list-style-type: none"> • Select either 'Yes', 'Partially' or 'No' that best reflects your firm's practice. <p>For question 16B please indicate whether the written policies are kept up-to-date with the regulatory requirements.</p> <ul style="list-style-type: none"> • Select either 'Yes' or 'No' that best reflects your firm's practice.
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NO.	DCR QUESTION	GUIDANCE
D16 - D16C	<p style="text-align: center;">LARGE-SIZED FIRMS</p> <p>Does your firm have a written AML/CFT/CPF policy, procedures and controls? (cont.)</p>	<p>Question 16C proceeds to ask whether the AML/CFT/CPF policies are provided to all the staff/employees.</p> <ul style="list-style-type: none"> Please select the answer that best reflects your firm's practice.
EMPLOYEE TRAINING & AWARENESS PROGRAMME		
D17 - D17B	<p style="text-align: center;">LARGE-SIZED FIRMS</p> <p>Does your firm conduct training and awareness programmes for the employees on the firm's AML/CFT/CPF practices and measures?</p>	<p>Select 'Yes' if your firm has provided training and awareness programmes for your employees in relation to your firm's AML/CFT/CPF practices and measures and proceed to questions 17A and 17B.</p> <p>If 'No', please proceed to question 18.</p> <p>In question 17A, please select the relevant method of training that your firm provides to your employees based on the options provided. You may select more than one option.</p> <p>In question 17B, please indicate the type of AML/CFT/CPF training that is provided to your employees based on the options provided.</p>

NO.	DCR QUESTION	GUIDANCE
EMPLOYEE SCREENING PROCEDURES		
<p>D18 – D18C</p>	<p style="text-align: center;">LARGE-SIZED FIRMS</p> <p>Does your firm conduct employee screening or background checks on your employees?</p>	<p>Please choose the type of employee screening (background check on employees) that your firm conducts. You may select more than one option.</p> <p>If you have selected 'Do not conduct any background check', proceed to question 19.</p> <p>If your firm conducts any form of background checks on the employees, there are 3 further questions that needs to be filled in as follows:</p> <ol style="list-style-type: none"> i. Question 18A is on whether the background check is conducted on all employees. <ul style="list-style-type: none"> • Please select 'Yes, all employees' or 'No, only selected employees', based on your firm's practice. ii. Question 18B is on when the background check is conducted. <ul style="list-style-type: none"> • Please choose the most relevant answer from the selection provided. • You may select more than one answer. iii. Question 18C is on how the background check is conducted. <ul style="list-style-type: none"> • Please choose the most relevant answer from the selection provided. • You may select more than one answer. <p>These checks assist RIs to assess their employees' risks to ML/TF/PF, fraud and bribery to ensure that they do not abuse their position or be vulnerable or used as a conduit to facilitate ML/TF/PF activities.</p>

NO.	DCR QUESTION	GUIDANCE
INDEPENDENT AUDIT FUNCTION		
<p>D19 – D19C</p>	<p style="text-align: center;">LARGE-SIZED FIRMS</p> <p>Does your firm conduct regular AML/CFT/CPF independent audits (frequency to be determined by the Board/SM/senior partners) to determine compliance and effectiveness of AML/CFT/CPF measures employed by your firm?</p>	<p>Select 'Yes' if your firm conducts regular independent audits on AML/CFT/CPF measures to determine the effectiveness and compliance with AMLA and the Policy Document.</p> <p>If 'No', please proceed to question 20.</p> <p>If your firm conducts independent audits, there are 3 further questions that needs to be filled in as follows:</p> <ol style="list-style-type: none"> i. Question 19A relates to the frequency of the independent audit. <ul style="list-style-type: none"> • Please choose the most relevant answer from the selection provided. ii. Question 19B relates to who conducts the independent audit. <ul style="list-style-type: none"> • Please choose the most relevant answer from the selection provided. iii. Question 19C relates to the scope of independent audit. <ul style="list-style-type: none"> • Please choose the most relevant answer from the selection provided. • You may select more than one answer.

NO.	DCR QUESTION	GUIDANCE
OTHERS		
D20	<p>COMPLIANCE SYSTEM Does your firm employ any compliance system to aid the firm's compliance to AML/CFT/CPF requirements?</p>	<p>Please answer 'Yes' or 'No'.</p> <p>A compliance system/ process refers to an infrastructure that supports the implementation of key AML/CFT/CPF requirements. This could be in the form of centralisation of clients' data and transactions, risk rating assignment, screening in relation to targeted financial sanctions (TFS), matching of politically exposed person (PEP) lists etc.</p> <p>Please note that employment of an automated compliance system is not a compulsory requirement. RIs may employ any system, manual or otherwise commensurate with their size and complexity, for effectiveness of its compliance programme.</p> <p>In answering this, you may consider any of the following statements:</p> <ul style="list-style-type: none"> • Whether the system/ process adopted commensurate with the total number of clients and complexity of products. • Whether the system/ process adopted allows the firm to detect irregularities/ any suspicious activity. • Whether the system/ process adopted is capable to centralise information across all branches, systems and agents.
D20A	<p>COMPLIANCE SYSTEM Generally, does your firm have any specific investment/ expenses/ resources for AML/CFT/CPF compliance purpose?</p>	<p>Please answer 'Yes' or 'No'. If 'Yes', please specify.</p> <p>These investments/ expenses can include the cost of procuring a system, providing training to staff and preparation of documentation for due diligence processes, or adjustment to processes.</p> <p>The answer provided on investment/ expenses/ resources is not confined to monetary value, and can include man hours, additional resources, etc</p>

NO.	DCR QUESTION	GUIDANCE
D21	<p>Are there any other information/ comments relating to AML/CFT/CPF requirements/ implementation within your firm that you wish to provide?</p>	<p>You may provide any feedback in relation to the AML/CFT/CPF requirements or implementation, including any specific areas of the AML/CFT/CPF requirements that your firm finds particularly challenging to implement.</p> <p>This is important feedback for BNM, Companies Commission of Malaysia and relevant self-regulatory bodies to focus on especially the identification of areas that requires the most support in assisting your firm or sector to comply.</p> <p>Please provide answers that best reflects your firm's views and experience.</p>

End of Document