	An environment Andrease and Andreas		Red and of the decay	Ref. o Remove and
Responding Party	Document Reference Section 4. Business-wide Risk Assessment (CBI Guidelines 4.2.1 vs. ESA Risk Factor Guidelines	Requisited Garge	Rationale for change Paragraph 16 of the ESA guidance is a list of sources that firms "may consider". These may not be available or appropriate to every firm and in every circumstance. CBI has included these in i	Other Comment
82951	Ancore - Administration rule summaries (or doublering s.e. a ve convex racial dataseties paragraphs 15 and 16)	Propage 34 of the USA goldence to a list of second bur from "may consider". These may write a wallable or agregation to every from and in overy chromotones. Of the included these is a list that "Pacify" be used in every chromotones. The "Madef" list in the CB Goldence result to be appropriate to every from and in overy chromotones. Or the included these is a list that "Pacify" be used in every chromotones. The "Madef" list in the CB Goldence result to be appropriate to every from and in overy chromotones. Or the included these is a list that "Pacify" be used in every chromotones. The "Madef" list in the CB Goldence result to be appropriate to every from and in overy chromotones.	Is that "bandle has used in every construction. The "bandle" lists in the CE divident ended to be adjusted with DSA program 25. It Receipts 12 of the DSA program 25. The program 25. The program 25. The DSA	Inconsistent - significant issue
	Section 4.4.1 (pg 14) Customer's Business or Professional Activities (CBI Guidelines 4.4.1 vs. ESA Risk Factor Guidelines		a not common to all curopean junisections.	
8091 8091	paransob 19 Section 4.4.1 cont'd (pg 15)	The R& Mengement section in the Off guidelines has agod dual of oneing with the risk section in the SSA Guidelines, it is recommended that the QI reduces the detail in its R& Mengement section to only highlight instances where it wither additional licitors to be considered compared to the SSA Guidelines or within to provide significant Cerlair Instances in the SSA Guidelines, it is recommended that the QI reduces the detail in its R& Mengement section to only highlight instances where it wither additional licitors to be considered compared to the SSA Guidelines or within to provide significant Cerlair Instances in additional gene large of Equidation.	Lead & here accelerated to that the second reference as "Section making and the market and the arcfites associate basis". Solids a confidence data is a second reference associated and the second reference assoc	Unintended Consecuences - Sienificant Issue
			Or ij/The outent of control exerted by one (or more) PEPs will determine if the entity in line with Uttimate Beneficial Owners (UBO) requirements per previous industry standardss & Guidelines i.e. 25% or 10% dependent of AML/OT Risk bating.	Unintended Consequence - Significant issue
82F1	Section 4.4.3 (pg 17) Customer's Nature & Behaviour	Legisl structure - in Tara ar inf factor -praetiliad appraach to proving		practical issue practical issue
BPF1	Section 4.5: Country or Geographic Risk Customer's Reputation (CBI Guidelines 4.4.2 vs. ESA Risk Factor Guidelines paragraph 20)	Continue established arease lists to the production spectralism in support and statement of the Company 12 of the USA statement is a list to stray where of the anomaly of the anomaly of the statement is a statement of the company 12 of the USA statement is a list to stray where of the anomaly of the anomaly of the statement is a statement of the company 12 of the USA statement is a list to stray and the anomaly of the statement of the anomaly of the statement of the company 12 of the USA statement of the anomaly of the statement of the statement of the anomaly of		practical issue
	Customer's Nature and Behaviour (CBI Guidelines 4.4.3 vs. ESA Risk Factor Guidelines paragraph	considered for each customer. The CBI Guidelines should alien with the ESA requirement to avoid a corrotation that non-acolicable risk factors need to be ruled out in each case.		Inconsistent
8011	Customer's Nature and Behaviour (CBI Guidelines 4.4.3 vs. ESA Risk Factor Guidelines paragraph 21)	Paragraph 10 the ESA guidance has "ink lactions may be relevant when considering the mix" recogning that auch of these lactions will be interact to every cultomer. In 4.4.2 GM says Task lactions that tirms should consider when assessing the mix		Inconsistent
8091	Customer's Nature and Behaviour (CBI Guidelines 4.4.3 vs. ESA Risk Factor Guidelines paragraph	The CB Guidelins was the built growt "The cantomer is a grocial pupper whick (PV) or structured funces company" instead of the LSA term 't ship cantomer a legip parton or amagement that could be used as an asset-adding whick)" The CB Guidelins would be LSA terminaries and association of the LSA term 'the cantomer a legip parton or amagement that could be used as an asset-adding whick)"		
80F1	Country or Geographic Risk (CBI Guidelines 4.5 vs. ESA Risk Factor Guidelines paragraph 22)	I INE La Quaterines Actual automation that Excentionements and actions that is action from the Automation Acid Actionation that Acid Acid Acid Acid Acid Acid Acid Acid		incontracem
BPFI	Nature and Purpose of the Business Relationship within the Jurisdiction (CBI Guidelines 4.5.1 vs.	b tab. Y the density the second set is constructed programmed unset, times hand an order the rest in the density that the the construct is an advanced of the second set. The density t	EA provides the list of factors as "for example" however in CBI Guidelines the same items become "Bitk factors firms should consider, include for example". The CBI Guidelines should align with the EA requirement to avoid a perception that non-applicable risk factors need to be ruled out in each case.	Inconsistent
8251	ESA Bisk Factor Guidelines paragraph 23) Products, Services and Transactions (CBI Guidelines 4.6 vs. ESA Risk Factor Guidelines paragraph 28)	Assended before in the InSC CB has added a risk factor abuset from the SSA guidance. "The ability to transfer ownambly of assets". Unlike the other three risk factors in this action his hitm necisies to explanatory subgrargingh to help clurity CD's interaction on how this may be applied. The CBF Caddelines should remove this added an and algo with the SSA requirement outers a specific risk factor from the Vactoral Kator in the residence "The CBF Caddelines should remove this added an and algo with the SSA requirement outers a specific risk factor from the Vactoral Kator in the residence and the residence and the second transfer and added and the specific risk factor from the Vactoral Kator in the residence and the risk factor from the Vactoral Kator in the residence and the r	with the ESA requirement to avoid a perception that non-applicable risk factors need to be ruled out in each case.	Inconsistent
8051	Transparency of Products. Services or Transactions Risk (CBI Guidelines 4.6.1 vs. ESA Risk Factor			Inconsistent
	Transparency of Products, Services of Transactions Hisk (Lai Guidelines 4.6.1 V). ESK Hisk Factor Guidelines oanaeraoh 29 Complexity of Products, Services or Transactions (CBI Guidelines 4.6.2 v). ESA Risk Factor	considered for each customer. The CB Guidelines should alim with the EA reasonment to avoid a perception that non-asolicable risk factors need to be ruled out in each case.		Inconsistent
8091	Complexity of Products, Services or Transactions (CBI Guidelines 4.6.2 vs. ESA Risk Factor Guidelines parateraph 30)	Paragraph 30 of the ESA guidance covers "biak factors that may be relevant when considering the risk" recognising that acto of these factors will not be relevant to very customers. In 4.6.2 (BI says "biak factors that firms should consider when assessing the risk include, for example" which suggests the full list should be considered for each customers. The LG displaying should be accessed on the customer to be relevant to the relevant to be relev		Inconsistent
BPFI	Value and Size of Products, Services or Transactions (CBI Guidelines 4.6.3 vs. ESA Risk Factor	considered for an output of the set output of the set of the set of the sectored in the other and and a formation in the set of a set output of the set of		
8251	Guidelines paragraph 31) Section 4A.8.1 – Weighting Risk Factors ( pg. 24 )	considered for each customer. The CB Guidelines should alim with the ES maximum to avoid a concession that non-solicialin risk factors need to be noted on in each case.	Should the anhanced due diligence that is completed during the outpanding encreas confirm that the relationship does not nessent an opening high money laundeing and/or terminit	Incensistent
	'structions identified by 40MLO or runtional ingliation as a laway presenting a high nonwy laundning mix cannot be own-rund by by the firms weighting for example a correspondent relationship with a firm outside of the EEA'.	ring matching is a particle response induction of other in the index of the Dapping of relationship revealed one particular of the Searce of a relationship revealed one particle of the Searce of The Searce Operation of The	for series six to the decise study excess they been is earlies in the Art eccession the decise study excess from charding the horizon could include a countling other than birth one of the second study of th	Ambiguous and likey to cause inconsistencies - Guidence and clarity
BPFI	Section 44.8.1 – Weighting Risk Factors cont'd.	The guidance does not deal with correspondent relationships among credit institutions or financial institutions where there is no underlying third- party costome i.e. what JMC50 refer to as "correspondent trading relationships"		Ambiguous and likey to cause inconsistencies - Guidance and clarity sought - Simificant issue
		When the definition of compandent inferendry one agains to include non-account relationships such as MAX SWP Tang, galaxies in repeated or the CCD requirements for three relationships particularly when such interfandings may be related to a particular to the company of the interfanding particular when such interfandings may be related to a particular to the company of the interfanding particular when such interfandings may be related to a particular to the company of the interfanding particular when such interfandings may be related to a particular to the company of the interfanding particular when such interfanding may be related to a particular to the company of the interfanding particular when such as the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the interfanding may be related to a particular to the company of the		Significnt issue - Consistency
6991	Section 4. (pg 26) Updating of ML/TF Risk Assessment		requirement to update risk assessment "as soon as possible". Business Wide Risk Assessment may not be a working doc but rather a static one. Clarity that monthly MI, assessments, etc is sufficient to evidence this.	Clarity and Guidance sought
8091	Section 5.2 (pg. 28)"Act on behalf of"	Clarification is required to 'persons purporting to a ten obtail of the conterner' to avoid unrinneded consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited consequences of the application of CCO measures to partie who endirarily act on behalf of the contorner, for example employees of regulated financial institutions or public limited content examples.		Clarity sought - definition to be expanded -suggestion to reduce any
		would consider these persons as those who ordinarily act on behalf of the customer as opposed to e.g. a power of attorney who does not ordinarily act but rather is purporting to act.		ambiguity, we would suggest the following wording is included in the guidance;
				'Persons purporting to act' this in general would cover power of
				attorney cases, Executor/Administrator, Ward of court etc Unintended Consequence
82991	Section 3.2 Customer Das Dilgenos (CDD) - (gg.29) "CDD involves more than just verifying the identity of a customer. Firms should collect and assess all nelwant information".		(1) prepared and the second se	
8251	Sertion 5.2 Costomer Due Dilizenze (CDD) - (nz 29.) (Costomer Due Dilizenze) states that firm	A "one-size fits all" approach across all product/s/services such as suggested may be problematic in some scenarios and may also result in assisting with laying transactions.	For example in marchast accurate function function and mass reserving card transactions back to a cardfolder. In collusion situations this could be a risk to addition, the cardfolder will	Significant issue. Clarifaction & Guidance needed
	Section 5.2 Customer Due Diligence (CDD) - (pg 29.) (Customer Due Diligence) states that firm should put in place processes to "return funds directly to the source from which they came".		For example, in merchant acquiring, "returning funds" would mean reversing card transactions back to a cardholder. In collasive situations this could be a risk. In addition, the cardholder will already have received as good/service from the merchant and will put the merchant at a disadvantage and there may be contractual/legal considerations involved	
\$2F1	Section 5.2 CDD Documentation and Information	Proceibe wording to be included in T&Gs ret: customer consent. are onboardine. of factors that will result in discontinuance of business relationship (as eer statutory obligations prescribed under CI40210	Landuates	Significant issue Clarification
80F1	Section 5.2.6. (pgs 33-34 ) Reliance on Other Parties to carry out CDD Section 5.3 (pg. 35) Customer Due Diligence - Ongoing Monitoring	This appears to go against the spirit the legislation, EBA guidance (s.40) and this guidance (s.40 and this guidance (s.40) and the second	Members have reviewed the EBA guidance which in Section 45 documents firms can adjust the frequency of CDD updates e.g. at trigger events.	Clarification and details sought
		To review all customers on a printice basis outside triggers and annual reviews would have a significant impact on forms, which we believe and have uniteded consequences.	Elsevents implicit actual and effects, schene 4.2 also assume from any apply includes bear and minimal. Includes and any apply any apply any apply energy events occurs which is the content in balance of any apply and any apply and apply energy events occurs which is the content in balance of any apply and any apply and any apply and any apply and apply and apply any apply and apply energy events occurs which is the content in a definition of events in a definition events apply and apply and apply appl	
				Inconsistency
8PF1	Ongoing Monitoring CBI Guidellines 5.3 cont'd Regarding ESA paragraph 10 "Monitoring and review.	ESA paragraph 10 "Monitoring and review. Firms mut	The CBI Guidelines should remove this added item and align with the ESA requirement unless a specific risk factor from the National Risk Assessment is highlighted or similar requires its addition. The word "Periodic" needs to be reviewed and looked at here in the context.	
		Jappenning var hydrolium vielas en terminis, ei regener of en angener of		Significant Issue - Inconsistent
8PF1	Section 5.2 (pg. 29) Beneficial Ownership	Sector 5.2.2 (Beneficial Ownership") tables that "where the product or service is of a type where it is obvious that it is being provided for the customer only and that there is no beneficial owner involved". This implies that there can effectively be a beneficial owner exemption in relation to "simplified products".	The Guidelines refers in part to a requirement to always "verify" beneficial owners, even in a simplified due dilgence context. In other parts, it acknowledges that at a minimum there is a requirement to "identify" but not verify	Ambiguous and likey to cause inconsistencies - Guidance and clarity sought
80F1	Section 5.2.4 (pg.32) Purpose and Nature of the Business Relationship	Relationship between signatories and beneficial owners - in corporate context		Practical issue
8251	Section 5.4.1 (ae.37) Simolified Due Dileence		Beneficial Ownership - situations where it is required to identify and werly is ambiguous - In addition, the Guidelines refers in part to a requirement to always "verify" beneficial owners, even in a simplified due dilisence content. In other parts, it acknowledges that at a minimum there is a requirement to "identify" but not verify.	Ambiguous and likey to cause inconsistencies - Guidance and clarity sought
			The Guidelines stars that accepting information from the customer rather than an independent source is not gerenitted in obtainer. In the undependent source is not gerenitted in obtainers, both descentabuly and intermetionality, on the operational stars and a star of the customer's descents. It is commonplace access the indexity, both descentabuly and intermetionality, on the queries information provided any provide stars and based on the provided and the customer's descents. If a star of the customer's descents and beneficial customs. Furthermore this was permittable under the provide Guidelines.	
	Section 5.4.1 (pe.38) Simplified Due Dileence measure which Firms may apply to Business		The individuals providing the identity information all perform independent control function roles within the company and are bound by various roles and laws in the operation of these roles. There would be a materially adverse impact if this was deemed to constitute accepting information from the customer rather than an independent source. The guidelines should be updated	
BPF1	Relationships or Transactions		These would be a materially adverse impact if this was deemed to constitute accepting information from the customer rather than an independent source. The guidelines should be updated to clarify that while self-certification of information is not permitted, reliance on information (on a risk basis) from independent parties within a company is acceptable	Guidance and clarity sought
8011	Section 5.4.1 (oz.38) Simplified Due Diference	Accurate information from outstamer rather than independent source when werkines (307 v Sentitiv lalised in 502 only?)		Guidance and clarity southt It would be extremely helpful to get clarification on how the CBI view the standards on the varying levels of PD's that we would come across
			In section 5.6.3 the document states: "here the risk associated with the PEP relationship is particularly high." It would be useful to obtain examples of what the regulator considers as	the standards on the varying levels of PEPs that we would come across in business. For example, a PEP who is prominent in a Government Cabinet vs a PEP who is an executive member of a small SOE and the
8291	Section 5.6.3 (pg. 42) Sorce of Welath/Source of Funds of PEP's	Inhanced On-pairing monitoring of MPA	in second 5.6.3 the document states: new the first associated with the VCP reasoning is particularly high. It would be careful to docare examples of what the regulator considers as particularly high.	Capter via PDP who is an executive member of a small SOE and the varying treatment they would expect to be applied to each case.
		Trins band regularly where the information the hybrid at 2PP ontonen and their Sendicid causes (where even even play information that could alloct the risk assessment is identified in a timely factors. The frequency of seguing should be determined by the firm commensators with the higher risk associated with the PP indication.		
		All PEPs do not pose the same risk. Some PEPs pose a lower risk e.g. some domestic PEPs and the guidance does not appear to allow firm apply a risk reling lower than trigh Risk to PEPs. The wording exit is in the guidance may cause confusion.	The publics state that from should per common or beneficial onnews who are HTD into a higher risk category. This is contrary to table regulatory publics in indicators from should require that the state of the part of the state	
		The FCA FG 17/6 The treatment of policity's opposed parameters for anti-money laundering parameters for action 2.10 tables; " The PGA IGN states in determining which the systems and procedure is a special control of the states of the states to which the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associates. The FCA would expect that this is a case-by-case associated on the risk would be increased by a business relationship with a PDP, family member or does associated on the risk would be increased by a business relationship with a PDP, family member or does associated on the risk would be increased by a business relationship with a PDP, family member or does associated on the risk would be presented on the risk would be increased by a business relationship with a PDP, family member or does associated on the risk would be increased by a business relationship with a PDP, family member or does associated on the risk would be increased by a business relationship would be presented on the risk would be increas	require all PEPs to be categorised as high risk. Section 37 (3) of the Act confirms that "[[]he steps to be taken are such steps as are reasonably warranted by the risk that the customer, or beneficial and the steps of the act confirms that "[[]he steps to be taken are such steps as are reasonably warranted by the risk that the customer, or	
8PF1	Section 5.6.4. (pg. 42) Enhanced Due Diligence in relation to PEP's	The bageness data is a descent of the second	beneficiary or beneficial owner (as the case may be) is involved in money laundering or terrorist financing." The Guidelines as currently documented are not consistent with obligations contained within the Act.	Contrary to other regulation on PEP's - Guidance and clarity sought
		its cale, clearing, liquidty management and short-term borrowing or investment needs.		
8FI	Section 5.7 (oz 43-44) Enhanced Due Dilizence to Correspondent Relationships	The Guidance excludes IMAs therefore there may be an expectation that firms apply the same level of EDD to IMAs as to Correspondent Bankine relationships.	Further exidence for RMAs is required.	Guidance and clarity sought
	Section 5.7.5. (pr. 45 Linion with Resondent Institutions.		The diadelines require compandent institutions to appoint a member of Jessin Management, the Campliance Officer, or the MARD to: Linux with the discuss any patential AUACPT Tasses with the respondent institution; Calcash was reaved; Calcash and any calcash and any calcash approximation of the compandent institution; COD measures. The responsent to appoint any calcular share of the company calcular share of the company calcular share of the measures.	
8271	Section 5.7.3 (pe. 46) Liaison with Respondent Institutions		The requirement to appoint a member of Senior Management, the Compliance Officer, or the MLHO to perform the stated tasks is very prescriptive and goes beyond what is required per Section 33 of the Act. It is commonplace for the named parties to overse the relevant processes and to ensure they are operating effectively, however, requiring these parties to undertake these tasks is encourse and me hower the uniteded consessence of didter in Knownhol and accountability in the Invited biomagement.	Clarification - Goes beyond Section 38
			Established or residing in a HRTC" - other guidances mention "based in" focated in", etc - suggest more clarity or standardisation of wording. In addition, Unusual Transactions or patterns -	
1971	Section 5.9 (pg 48) EDD in realtion to High -Risk Third Countries and other High -Risk Situations	CE should provide this clarification to recognise the separation of management responsibilities interent in larger organizations. In such organizations CDD responsibilities are not generally held at Executive or Sourd level but are delegated to senior management with the appropriate seniority, skills and experience to make	monitoring the business relationship more frequently-for how long if no suspicion found? UAR (or SAR) = automatic increase in risk categorisation?	Language - Clarifiaction and further details required
		decisions on behalf of the firm in line with the legislation.		Clarity and Guidance required
8091	Section 6 Governance - Role of Senior Management and the MLRD - (Pgs. 51-53)			
8051	The definition of "Senior Management" in Section 6: Governance of the CBI Guidelines should be	Agen CB should provide this charilization to ensure that manning of the term "Serior Management". In the context of the particular to free management to bload of a Cell Institution (or the management to bload of the firm in instances when by the firm does include as a defined within the CB foodiment access on the document that a refers while in other samily is referred to bload of Director, Clericotor Support for the sec		Draftina - Consistency

sponging Party	Document Reference	Requisted Change	Rationale for charge	Unter Comment
		In CBI Guidelines 6.3.1 propose rewording to remove reference to MLRO by revising the sentence to read "firms should ensure that there is effective reporting and escalation on AML/CFT matters to Senior Management."		
				1
		Where the MLRD is in the second line the provision of AML/CFT MI is unlikely to be part of that role. Instead the provision of MI is likely to be a first line role (N.8. the production of the MLRO report would continue in second line.)		
		In CBI Guideline 7.4 propose making explicit that the clarification made in the first sub-builet applies in the following two sub-builets to read:		
		"Tor example the internal reporting procedures should include at least:		
		<ol> <li>All required steps for the reporting of suspicions from staff to the MLRO, or any other person(s) charged under the firm's internal reporting process with investigating suspicions, and from that person (s) to the authorities;</li> </ol>		
	References to MLRD in Section 6 - Governance 6.3.1 (pg. 51) and Section 7 - Internal Reporting of			
	Suspicious Transations 7.4 (pg. 58) Reporting of Suspicious Transactions should be made less	ii) The timeframes for escalation of suspicious transactions from when a staff member first identifies a suspicious transaction to when it is raised to the MURO, or any other person(s) charged under the firm's internal reporting process with investigating suspicions;		
	specific to ensure that there is no conflict between the role as described in the CBI Guidelines and			
fl	its position as an oversight role/part of the second line of defence in large Credit Institutions.	iii) Formal acknowledgement by the firm's MURO, or any other person(s) charged under the firm's internal reporting process with investigating suspicions, of suspicions raised internally by staff,"	Mirror pre-existing text /wording	Drafting- Consistency
		Clarification is sought regardign the scope of application and extent of the definition of a Politically Exposed Person (PEP) i) One director of a customer is a PEP so therefore the customer is to be considered by default as a PEP Entity i.e. incorporated entity is subject to Enhnced Due Diligence (EDD): Senior Management.		
fl	Section 6 - 6.6.1 Group wide policies and procedures (pz. 56)	jaconowie more freeard nonitrie etc. Or 10 The activity of more 1927 will determine if the activity in activity that Ultimate Beneficial Owners LUBO) requirements per previous industry standards & Guidelines i.e. 25 % or 10% desendent on AMU/CPT Bisk Ratine. The Guidelines requires compositive institutions to appoint a manifered of the activity in activity and activity activity and activity and activity and activity ac	of the customer. for example employees of regulated financial initiations	Clarity and Guidance required
		The subsense regular comparisoners instructions to appoint a memory of samer wangement, the Comparison with the regorder of the instruction of the comparison of the second of the instruction of the second of the		
		Laave with and backs any potential Avail. (2) I have with the responsent instructors; Distain the researce CDD information: and		
		Uction free international control internationa control internationa control internatione		
		In necessary, concurs an onside value to the responsent institution's onlices as part of the correspondent institution's club measures.	Depending on the size of the Firm, there may be varying operating models in place to execute these responsibilities. We would suggest changing the wording to reflect such operations e.g.	
	Section 7.4 (pg.57) 'Internal reporting of Suspicious Transactions', the guidelines document the	The requirement to appoint a member of Senior Management, the Compliance Officer, or the MLRD to perform the stated tasks is very prescriptive and goes beyond what is required per Section 38 of the Act. It is commonplace for the named parties to oversee the relevant processes and to ensure they are operating	Depending on the use of the Firm, there may be verying operating modes in place to execute there reports using the verying the verying operating modes in place to execute there reports with the verying the very	
	responsibilities of the MURP to report the suspicion to the authorities	Interrepartment to appoint a memotor do sinto management, the comparison of market on taxis, to appoint an experience on as or tim ACL is a commonpace to the animal parties to overside the relevant processes and no sincere treey are operange effectively, however, requiring these parties to underlate these takis is services and on the united and conceptance of diluting risk controllability in the relevant business areas.	larger times may have instruction instruction to the report of the report of the set of	Clarity and Guidance required
fi .	Section 8 Training - Frquency of training 8.3 (pg. 62)	emectowy, nowwer, regime these parties to understart these tasks is accurate and may have the unitedual consequence or outsigned and accountation in the research during and accountation in the research during area. Large financial institutions can have many to be year scores multiple factors. Some of these tasks are too many to have accurate and the parties to the score accurate and the parties of the score accurate and the parties of the score accurate and the parties of the score accurate ac	and we delive that this is not the interded expectation in this guidance.	Clarity and Guidance required
	account numming - reduced or comming and (bit-ort)	carge manual manualism can save many tow types sciola manufare sanctions. Solid or one many take ingligious of no percycle mode		
		The following statement should be amended as oncoosed to recomise such situations:		
		Interstowing statements and/or and the proposed to recognize such structures: Staff in existence facing roles with responsibilities for AMM productives controls should receive AMX/CPT training prior to interacting with customers.		
		The incompared results and under the second or counters and the second		Inconsistant
9	Section 8 Training - Training of Outsource Service Providers 8.5 (pg. 62)	Consistent with a Firm's accountability for activity it has outsourced the obligation is for the outsource to contractually define the service to be provided by the Outsource Service Provider.		
	and a second or comparement of high out	and the second s		1
		The outpoursing firm must ensure its obligations under applicable Irish legislation are mut though its management and oversight of the relationship with the Outpourse Service Provider.		
		The second grant master end of a second s		
		In this situation it is unclear why any of "the staff at the Outsource Service Provider" would need to be trained on the "applicable AML/OT legislation" for which the outsource remains accountable (and which likely does not apply directly if the Outsource Service Provider is in another jurisdiction.)		
		по из выязон на колле воју совезана са на селото и селото и селото и проздене и селото и проздене и на составане на после на колле селото и проздене и на после разбол на проздене на на после разбол на проздене и на после разбол на проздене		Considency
fl	Section 8 Training - Training of Outsource Service Providers 8.8 (pg. 63)	Effective assessment of training need not be at the end of a training module, it can be designed to test knowledge throughout the training material.		
		The sentence should be arrended to read:		
		Firms should ensure that the AMU/OT trainine provided includes an assessment or examination, which should be passed by all participants in order for the AMU/OT trainine to be recorded as completed.		Significant issue
fi	Section 9 Record Keeping 9.1 (pg. 65) Adequate Records	R would be helpful for the CBI Guidelines to clarify the retention/deletion time periods for each record category.	"All documentation and information obtained for the purposes of identifying and verifying a customer, person(s) authorised to act on behalf of the customer and any beneficial owners;" -	
			clarity (e.e. on applicability to authorised signatories) required or define part in hold.	Clarity and Guidance required and should be pro-
fl	Absence of Specific Guidance (Various)Specified customer, product, service, transaction or delivery		Consistent with ESA Risk Factor Guidelines/4AMLD (EU 2015/849) national authorities could provide guidance to supplement the provisions of the directive and support firms in the	
	channel risk factors that firms may take into account when considering the application of		application of SDD.	
	simplified customer due diligence Pooled Accounts Guidance			
			For example, CBI should consider following the example of the UK Regulations (regulation 37) where firms are specifically allowed to consider application of SDD (in the context of the overall	
			customer and business-wide risk assessment) for categories including:	
			Credit and Financial Institutions subject to requirements of 4AMLD	
			A "pooled account" product provided to entities within the scope CIA 2010 as amended (or equivalent provisions in another member state)	
		Consistent with ESA Nisk Factor Guidelines/4AMLD (EU 2015/849) national authorities could provide guidance to supplement the provisions of the directive and support firms in the application of SDD.	The guidance is silent on the AML Measures that should be applied to Pooled Accounts and we would request that these factors should be included in the content of the guidelines. EBA	
			guidance (s 109-312) provides a high- level guidance.	
		For example CBI should consider following the example of the UK Regulations (regulation 37) where firms are specifically allowed to consider application of SDD (in the context of the overall customer and business-wide risk assessment) for categories including:		
		-Credit and Financial Institutions subject to requirements of 44MLD	The guidance is silent on the AMI: Measures that should be applied to Pooled Accounts and we would request that these factors should be included in the content of the guidelines. EBA	La
		<ul> <li>A "gooled account" product provided to entities within the scope CIA 2010 as amended (or equivalent provident to another member state)</li> </ul>	zuidance (s 109-112) provides a hish-level audience. Members's would welcome zuidance in that search	Clarity and Guidance required
1	Absence of Specific Guidance -Section 33 (2A)		Members would welcome guidance on 5.33(2A) which is not addressed in the guidance notes.	
		Members would welcome sublance on \$.3312A) which is not addressed in the sublance notes.	Members would welcome guidance on 3.33(2A) which is not addressed in the guidance notes. Members could welcome jurisde in the requesting USAV documentation from people who might fail into this category, perhaps as a Letter of Authority (e.g. family member) or Power of Attorney,	
	1	Members would welcome guidance on 3.31(2) all which in rel addressed in the guidance notes. Members concerned in in relation to requesting (BX / documentation from people) who might fail list bits category, perhaps as a Letter of Authority (e.g. family member) or Power of Atterney, but the financial institution concerned may not have a business relationship with that person; in cases such as these would there not		1
	1	Members contern is in reliable to requesting DKV documentation from people who might full into this category, partups as a latter of Authority (e.g. lamity member) or Power of Attorney, but the triancial institution concerned may not have a business reliaboning with that person; in cases such as these would there not be a privance conterned?	but the financial institution concerned may not have a business relationship with that person; in cases such as these would there not be a privacy consideration or concerns? Also, would solicitors, MABS and Phs, for example, fail under this requirement, as such organizations often operate as LDA(POA), and if so, how would financial institutions stand in relation	1
	1	Data partures consideration on concentral Halo, workd solicitores, MARS and PMs, for example, fail under this requirement, as such organisations often operate as LOAL/PCAA, and if so, how would financial institutions stand in relation to requesting documentation from them?	Also, would solicitors, MABS and Pis, for example, fall under this requirement, as such organisations often operate as LOA(/POAs, and it so, how would financial institutions stand in relation to requestion from them?	1
		print, mouse annulating mouse and print, mouse and programmers and and organizations of the operation of the	in understall normalization turns and	Einselfictunt interes
	Absence of Specific Guidance - Examples of documentation that would provide examples of	A non-prescriptive list of acceptable documents (as has previously been provided in February 2012 as Appendix 2 to Criminal Justice (ML & TF) Act 2010 Guidelines) would continue to provide a valuable reference.		Significant issue
	alternative documentation supporting financial inclusion	A Interpretationer in an acceptance documents particulary and provided in the owny and a subpretax and communication process of the proces		
		Non-proscriptive pusience presented as exemples would not unduity inhibit firms from using new technologies unduity inhibit firms from using new t		Significant issue
	Certification of documents			And Address of the Ad
			It is common practice for banks to require a higher standard to evidence IDBV for higher risk customers. Principles and practices can vary substantially between firms. We recommend the	
			proposed Guidelines clirify that firms can meet requirements by accepting uncertified documents for standardd risk customers or where face-to face. Additionally, language requirements for	
41			certification and /or notarisation similaar to that within the 2012 Guidance Notes should be provided given stakeholder engagement outside of Ireland.	Clarity and Guidance required
	Removal of Section 34 from the Legislation	Section 34A does not address the CDD requirements for pooled accounts for regulated entities and there is insufficient detail in the guidance on the dur dilgence to be applied.		
	· · · · · · · · · · · · · · · · · · ·		CDD requirements for pooled accounts - members' would request similar guidance as to UK.	1
f1		The UK legislation. Neuralistion 37(5)(6) and audiance. JML5G Prevention of money launderine / combatine terrorist financine. Section 5.3.142 are clear in the CDD mountements for pooled accounts and we would request similar audiance.		Significant issue
			In addition, the lack of guidance in relation to requirements pertaining to director identification and verification procedures contained within the new Guidelines and believe that the provision	
		Members' note the lack of guidance provided in relation to identification and verification requirements and procedures, which were previously contained in Appendix 1 of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 Guidelines. We believe that it would be very beneficial to have similar	of guidance in relation to the CBI's expectation as to the implementation of CDD procedures is an absolute requirement. Other jurisdictions have provided clarity on the level of identifying	
	General Observation in Relation to Identification and Verification Requirements:	information pertaining to identification and verification requirements and procedures contained within the new Guidelines. It is becoming a norm for global customers to seek evidence of specific, legal obligations to substantiate the requirement to provide identification and verification materials.	information required for directors and in some specific instances exemptions have been noted (for e.g. directors of a listed entity).	Calrity & Guidance required
8		STR/Disclosre-The terminology appears to be interchanged in the document and has resulted in some confusion. We would request these instances are reviewed and clarified.	Consistency of terminology	Laungauge - Editorial
n 1	Additional Comments			
F1 F1				
1	Additional Comments	CP (CF) Anders's work works and segment but it is incorrect. CP (CF) Anders's work works and segment but it is incorrect.	encountered in the constants	