

NIGERIAN BAR ASSOCIATION ANTI-MONEY LAUNDERIN COMMITTEE

AML/CFT QUESTIONNAIRE FOR INDEPENDENT LAWYERS

A. General information

Name(s) of firm or entity: Click to enter text.

Type of organization if other than partnership: Click to enter text.

Address(s) where it operates from (identify head or main office): Click to enter text.

No. of owners, partners or shareholders: Click to enter text. No. of employees: Click to enter text.

Contact details: Phone No(s): Click to enter text.

Email(s): Click to enter text.

Website: Click to enter text.

Supreme Court Enrolment No.: Click to enter text.

Name and title of the individual completing the questionnaire: Click to enter text.

Signature:

Date: Click or tap to enter a date.

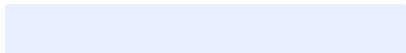
B. Lines of business	<u>No. Clients</u>	<u>% of Gross Annual Revenue</u>
<i>If you do not provide any of the stated services complete only the first page and return the questionnaire to NBA AMLC.</i> B1: Do you provide, as a part of your regular business, any of the following services or transactions for clients (N/A for those that do not apply): a. buying and selling real-estate. b. managing money, securities or other assets. c. opening and managing bank accounts, savings deposits or securities accounts. d. creating, registering (including acting as registered agent and secretaries for companies), or managing companies, legal entities or arrangements including collecting funds for such activities. e. Buying and selling companies, legal entities and arrangements. f. Acting as trustee and nominee (e.g. nominee shareholder). g. Consulting services for any of the above and tax advice.	Type Here. Type Here. Type Here. Type Here. Type Here. Type Here. Type Here.	Type Here. Type Here. Type Here. Type Here. Type Here. Type Here. Type Here.
B2: Total number of clients: a. Regular customers under B1. b. Occasional (walk-in) clients under B1.	Type Here. Type Here.	Type Here. Type Here.
B3 Estimated gross revenue from above activities (last calendar year) in Naira.	Type Here.	Type Here.

D. AML/CFT Program				For AMLC Use Only	
				Observation of the analysis	Rating
D1 Policies and Procedures (yes, no or NA)	Yes	No	Description / Remarks		
Has your firm formally approved and communicated to staff AML/CFT policies and procedures? If so, how are they communicated?					
How often does the firm review its AML/CFT policies and procedures? Explain the review process.					
Has your firm implemented AML/CFT policies and procedures that provide for:					
a. Customer identification and verification?					
b. Identification and verification of ultimate beneficial owners and beneficiaries?					
c. Recording and retaining information on client companies and other legal entities with respect to their shareholders, beneficial owners, beneficiaries and controllers?					
d. Monitoring customer activities and updating customer information and risk profile?					
e. Retaining records of customer transactions?					
Does your firm classify customers by risk? If so describe the system and classification used by:					
a. Customers					
b. Lines of business					
c. Other					

D. AML/CFT Program				For AMLC Use Only	
				Observation of the analysis	Rating
Is customer due diligence risk-based, i.e. enhanced due diligence for high risk categories of business and normal due diligence for others?					
D2 Monitoring and Reporting					
Has your firm implemented monitoring systems for detecting unusual and suspicious transactions?					
Has your firm, over the past 12 months, detected unusual or suspicious transactions? If so: a. How many were unusual? b. Suspicious?					
Who decides on whether a customer, account, transaction or activity is suspicious? Describe the decision-making process.					
Did your firm send any suspicious activity reports to the NFIU over the past 12 months? If so, how many?					
How many CTRs were sent to the NFIU in the past 12 months?					
D3 Internal Control					
Has your firm implemented an internal audit unit or internal controls in relation to AML/CFT procedures?					
Does the scope of the Internal Audit Department/ internal controls related to AML/CFT cover all company business, transactions and customers?					
Are the results of the AML/CFT internal controls applied traceable, in written and know by the management?					
Are managements information systems (MIS) in place?					

D. AML/CFT Program				For AMLC Use Only	
				Observation of the analysis	Rating
Does the management monitor the implementation of the corrective action taken in relation to AML/CFT policies and procedures?					
D4 Compliance Function					
Has your firm implemented an AML/CFT compliance function?					
Has a compliance officer been designated? If so, what are his/her functions? Name?					
Does the compliance officer perform non-AML/CFT duties? If so, what percent of time is dedicated to AML/CFT issues?					
D5 Training					
Has your firm implemented an AML/CFT training program for its staff? Describe: frequency, topics, etc.					
Does the compliance officer undergo specialized training on AML/CFT issues?					
What is the training budget for the current year?					
How many staff members have been trained in the past 12 months? What was the nature of the training e.g. workshops, etc.					

I hereby certify that the statements and information in this questionnaire form are true and correct to the best of my knowledge and belief, and I authorize NBA AMLC to use it for supervision purposes.


Signature of the compliance officer

Click to enter a date.
Data (dd/mm/yyyy)