## Structure of the AML/CFT site

- Introduction
  - Background
  - Objectives
  - Methodology
- Scope
- Definitions
- Risk-based approach and overall risk assessment
- Organisation and internal control
  - Organisation and internal control in financial institutions
    - o Governance
    - Risk classification
    - o Policy, procedures, processes and internal control measures
    - o Training and education of staff
    - o Internal whistleblowing
  - Organisation and internal control in groups
    - Belgian parent companies
    - Belgian subsidiaries and branches
    - Central contact points in Belgium of financial institutions governed by the law of another Member State
  - Performance of obligations by third parties
  - Brexit

## Customer and transaction due diligence

- Individual risk assessment
- Anonymous or numbered accounts, safe-deposit boxes and contracts
- Identification and identity verification
  - o Persons to be identified
  - o Object of the identification and identity verification
  - o Time of identification and identity verification
  - o Non-compliance with the identification and identity verification obligation
- Identification of the customer's characteristics and of the purpose and nature of the business relationship or the occasional transaction
- Due diligence on business relationships and occasional transactions and detection of atypical facts and transactions
- Special cases of enhanced due diligence
  - o Identity verification over the course of the business relationship and implementation of measures as an alternative to terminating a business relationship
  - High-risk third countries
  - o States with low or no taxes
  - o Correspondent relationships
  - o Politically exposed persons (PEPs)
  - Assets repatriation
  - Recommended actions in the event of credible publications of mass fraud or ML/FT cases in the press
- Due diligence requirements and de-risking
- Due diligence requirements and compliance with other legislation
  - o Combating discrimination
  - o Protection of personal data
  - Basic banking services

- o Access by payment institutions to credit institutions' payment account services
- Analysis of atypical transactions and reporting of suspicions
  - Analysis of atypical facts and transactions
  - Reporting of suspicions
  - Prohibition of disclosure
  - Protection of reporting persons
- Transfers of funds
- Financial embargoes and assets freezing
- Data and document retention
- Personal data processing and protection
- Restriction of the use of cash
- Supervision by the NBB
  - New institutions
  - Reporting by financial institutions
  - External whistleblowing
  - Supervisory powers, measures and policy of the NBB
  - National cooperation
  - International cooperation
- Sanctions
  - Administrative sanctions
  - Criminal sanctions
- Useful links and documents
  - Main reference documents
  - Other useful links
  - Successive versions of the AML/CFT site