

Topics to be Reviewed	Examination Focus	Assessment Period	Targeted Sector
Risk Assessment	<ul style="list-style-type: none"> • Establishment of a risk framework that has the capability to identify and determine the risks of an applicant for business. • Components of risk assessment. • Appropriateness of risk ratings assigned. 	1 st Quarter	Investment Business
Updating of Customer Diligence	<ul style="list-style-type: none"> • Policies and procedures established to collect updated information. • Frequency and nature of updates carried out. • Transaction monitoring. 	1 st Quarter	Investment Business
Enhanced Customer Due Diligence	<ul style="list-style-type: none"> • Appropriateness of Enhanced Customer Due Diligence Policies. • When and how ECDD measures are applied. • Monitoring where ECDD measures are applied. 	1 st and 2 nd Quarter	TCSPs and Investment Business
Sanctions Monitoring	<ul style="list-style-type: none"> • Ability to conduct timely searches of entire clients' database. • Actions taken where it is revealed that a client may have been sanctioned. • Knowledge and Training. 	1 st and 2 nd Quarter	All

Record-keeping Transaction Records	<ul style="list-style-type: none"> • Awareness of where records are maintained and who maintains them (where not required to maintain such). • Ability to retrieve records from responsible persons (where not required to retain such). • Quality of transaction records where required to retain such. 	3 rd and 4 th Quarter	TCSPs
Suspicious Activity Reporting Procedures and Reports	<ul style="list-style-type: none"> • Ability to identify suspicious transactions. • Internal and external reporting of suspicious transactions. • Record Keeping as relates to suspicious activities. 	3 rd and 4 th Quarter	TCSPs and Investment Business