



INTEGER WEALTH GLOBAL

Procedure Document

Anti-Money Laundering & Countering the Financing of Terrorism (AML/CFT) Procedure

Issue: February 2025 (Update from 2022)

Procedure

Below are concise procedures and workflow steps for daily operations. Use these as SOPs for teams and embed them into operational manuals.

A. Onboarding (Simplified SOP)

1. Receive onboarding request → Client Relationship Manager (CRM) populates application.
2. CRM performs initial screening: sanctions, PEP, adverse media, jurisdiction risk. If any hit → immediate hold and escalate to Compliance.
3. Collect KYC documents (ID, proof of address, corporate docs, UBO declarations). Use electronic verification where permitted.
4. Complete Customer Risk Assessment (Low / Medium / High) using the BRA matrix. (Record rationale.)
5. If Low/Medium → Compliance review and approval. If High → EDD required + Senior Management approval.
6. Set monitoring rules and transaction limits in monitoring system.
7. Activate account and log onboarding file into records repository.

B. Transaction monitoring & alert handling

1. Automated system generates alert → assigned to analyst.
2. Analyst reviews transaction, customer profile, documentation and external info.
3. If no suspicion → close alert with reason. If suspicious → escalate to MLRO with recommended action.
4. MLRO decides: file SAR, freeze account (if law permits), or seek additional info.
5. All decisions recorded and retained.

C. SAR filing

1. MLRO prepares SAR with supporting evidence and legal basis.
2. File via local FIU channel in relevant jurisdiction(s) within statutory timeframes. (No tipping-off.)
3. If cross-border nexus, coordinate filings with Group Counsel and other jurisdictional MLROs where prudent and permitted.



Annexes (templates & checklists)

Annex 1 — KYC Checklist (minimum)

- Natural person: ID copy, proof of address (dated within 3 months), DOB, nationality, tax residency, occupation, source of funds/wealth, PEP check, sanction check.
- Legal entity: Certificate of incorporation, memorandum & articles, register of directors, register of shareholders, UBO declarations, corporate structure chart, recent financials, source of funds statement.

Annex 2 — Customer Risk Assessment matrix (example)

- Low: Regulated, public company, EU/EEA jurisdiction, transparent ownership, small predictable flows.
- Medium: Non-EU corporate ownership, higher transfer activity, non-complex structure.
- High: PEP, opaque ownership, high-risk jurisdiction, frequent large cross-border transfers.

Annex 3 — Internal SAR form (fields)

- Client details, transaction details, reason for suspicion, supporting documents, analyst name, MLRO decision and action taken.

Practical next steps for IWG (recommended)

1. Adopt this policy as Group baseline; have local compliance officers adapt to local law specifics (notification channels, retention periods, thresholds).
2. Appoint/confirm Group MLRO and local AML officers with contact details published internally.
3. Configure monitoring & screening systems to support the CDD/EDD rules in this policy.
4. Deliver role-based AML training within 30 days and certify completion.
5. Commission an independent gap analysis vs. local supervisory manuals (CSSF, FMA, GFSC, CySEC) and EU/AMLA requirements; remediate any gaps.

References (selected)

- European Commission — Anti-money laundering & CFT at EU level. [Finance](#)
- Directive (EU) 2024/1640 (AML legislative package). [EUR-Lex](#)
- Regulation (EU) 2015/847 on transfers of funds. [EUR-Lex](#)
- FATF — 40 Recommendations. [FATF+1](#)
- CSSF — AML/CFT guidance (Luxembourg). [CSSF](#)
- FMA Liechtenstein — AML/CFT resources. [fma-li.li](#)
- GFSC — AML guidance & AML/CFT/CPF Guidance Notes (Gibraltar). [GFSC+1](#)
- CySEC — Prevention of Money Laundering and Financing of Terrorism guidance (Cyprus). [cysec.gov.cy](#)



2. Jurisdiction-Specific Addenda

Luxembourg

- FIU / Reporting authority: *Cellule de Renseignement Financier (CRF)*, Ministry of Justice. Reports via *goAML* portal.
- Record-keeping: Minimum 5 years after end of relationship or occasional transaction (extendable to 10 years upon request by authorities).
- Unique requirement: Must notify CSSF if AML compliance function (e.g., MLRO) changes. Beneficial ownership information must be checked against the *Registre des Bénéficiaires Effectifs (RBE)*.

Liechtenstein

- FIU / Reporting authority: *Financial Intelligence Unit (FIU)* Liechtenstein, under the National Police. Reports submitted via electronic *goAML* platform.
- Record-keeping: 10 years after end of relationship or completion of transaction.
- Unique requirement: Must implement *risk mitigation measures* for clients from higher-risk jurisdictions (including additional approval layers). Annual AML report to regulator (*FMA*).

Gibraltar

- FIU / Reporting authority: *Gibraltar Financial Intelligence Unit (GFIU)*. Reporting through *Themis* (online reporting portal).
- Record-keeping: 5 years from end of business relationship or completion of transaction (extendable to 10 years if required for investigations).
- Unique requirement: Firms must appoint a *Nominated Officer* (MLRO equivalent) and notify the GFSC. Specific guidance packs provided by GFSC must be followed.

Cyprus

- FIU / Reporting authority: *Unit for Combating Money Laundering (MOKAS)*. Reports submitted electronically through the *goAML* system.
- Record-keeping: 5 years after end of relationship or completion of transaction.
- Unique requirement: Enhanced checks required for *shell companies*, particularly those registered in non-transparent jurisdictions. CySEC requires firms to file *annual AML compliance reports* (Form 144-08-11).



3. Templates

A. Suspicious Activity Report (Internal SAR Form — for staff to submit to MLRO)

Integer Wealth Global — INTERNAL SAR FORM

(Confidential — not to be disclosed externally except to MLRO/Compliance)

1. Reporter details

- Name:
- Position:
- Department:
- Date of report:

2. Customer details

- Full name / Entity name:
- Account / Client ID:
- Date of birth / Incorporation date:
- Address:
- UBO(s):

3. Transaction / Activity details

- Date of transaction(s):
- Amount & currency:
- Counterparty details:
- Description of activity/transaction:

4. Reason for suspicion

- Red flags observed:
- Inconsistencies with profile / expected activity:
- Links to high-risk jurisdiction / PEP / sanctions:

5. Supporting documents (attach where available)

- Statements / transfer slips / communications:

6. Staff declaration

- “I reasonably suspect this activity may relate to money laundering, terrorist financing, or another financial crime.”
- Signature:



7. MLRO use only

- SAR number:
 - Action taken: Filed with FIU? (Y/N)
 - Date filed:
 - Reference number:
 - Notes:
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B. Customer Onboarding / KYC Form (Corporate)

Integer Wealth Global — KYC Form (Corporate Customers)

1. Basic Information

- Company name:
- Registration number:
- Date of incorporation:
- Country of incorporation:
- Registered address:
- Business activity:

2. Ownership & Management

- Directors (names, DOB, nationalities, addresses):
- Shareholders (>25% ownership):
- Ultimate Beneficial Owners (UBOs):
 - Name:
 - Date of birth:
 - Nationality:
 - Address:
 - Ownership %:

3. Contact person

- Full name:
- Position:
- Email / phone:

4. Financial Information

- Expected turnover with IWG (annual):
- Source of funds:
- Source of wealth:
- Bank account details (IBAN, bank name, country):
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5. Risk checks

- PEP status (Y/N, details):
- Sanctions screening result:
- Adverse media check:

6. Declaration

- I/we declare that the above information is true and correct.
- Signature:
- Date: