

**CHECKLIST OF 'ACTIONS' RECOMMENDED TO
SOLICITORS TO ENSURE COMPLIANCE WITH AML
OBLIGATIONS**

1. Read the Guidance Notes
2. Read the relevant legislation (links in the Guidance Notes or download in full from the AML web area)
3. Appoint an MLRO (see paras 8.38– 8.42 of the Guidance Notes)
4. Appoint a Compliance Officer (see para 10.16)
5. Review your Letter of Engagement and ensure that it makes reference to your anti-money-laundering obligations
6. Assess your firm's risk profile (see paras 4.13 – 4.21)
7. Conduct a risk assessment (see paras 4.22 – 4.30)
8. Draft a formal written policy and procedure document to contain guiding principles and the firm's risk mitigation approach (see para 4.33) and to cover the following:-
 - Risk Assessment & Risk Management (see paras 4.1 – 4.32)
 - Internal Controls & Compliance Management (see paras 10.3 – 10.10)
 - Client Due Diligence (see paras 5.2 – 5.74)
 - Identification & Verification (see paras 6.1 – 6.50)
 - Third-party Reliance (see paras 7.1 – 7.19)
 - Record-keeping (see paras 11.1 – 11.23)
 - Reporting and Tipping Off (see paras 8.1 – 8.58)
 - Training (see paras 12.1 – 12.23)
 - Policy for dealing with directions, orders and authorisations from Gardaí (see paras 14.10)
9. Communicate the policy and procedures to all relevant staff
10. Organise training