

PART 2: Checklist for Applicants



**ANTI-MONEY LAUNDERING AND
TERRORISM FINANCING COMPLIANCE
FORM**

**IN TERMS OF THE FINANCIAL INTELLIGENCE AND ANTI-MONEY LAUNDERING
REGULATIONS 2018; AND
THE FSC CODE ON PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING
2012, AS AMENDED
(MAURITIUS)**

MANHATTAN DOLLAR YIELD FUND LIMITED

APPROVAL SECTION: (Complete this part after all other parts have been completed and verified)

Completed by: _____
NAME, SIGNATURE & DATE

Approved by: _____
NAME, SIGNATURE & DATE
(Clients classified as High Risk to be approved by senior management)

PART A: RISK CLASSIFICATION (PLEASE TICK CORRECT CLASSIFICATION)

High risk	Medium risk	Low Risk
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If answer is YES to any of the 4 QUESTIONS BELOW, the client is to be categorised as High Risk

1.	Is the entity type a non-profit organization, unregulated fund or inter-vivos family trust If yes, please specify.	
2.	Is the occupation or business of the client any of the following <ul style="list-style-type: none"> • Armament manufacturers, dealers and intermediaries • Unregulated casinos and other unregulated gambling related business • Dealers in high value precious goods If yes, please specify.	
3.	Is the client registered, domiciled or a citizen of a high-risk country ? (<i>see attached A annexure for list of high risk countries</i>) If yes, please specify.	
4.	Is the client a Politically Exposed Person (PEP)? PEPs are individuals who are or who have been entrusted with prominent public functions (for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations and important political party officials). Licensees should be aware that business	

Initial _____

	relationships with PEPs, family members or close associates of PEPs are deemed to pose a greater than normal money laundering risk to Licensees by virtue of the possibility for them to have benefited from proceeds of corruption.	
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Over and above the below medium risk requirements, the below Enhanced Due Diligence is required for High Risk Clients		
Obtain additional publicly available information and documentation relating to the identity of the client by conducting a search on the Dow Jones risk and compliance system – see Annexure C - Dow Jones Risk and Compliance system procedure		
Obtain senior management (director) approval for establishing a business relationship with a high-risk client;		
Reasonable measures must be taken to establish the source of wealth and the source of funds of the high-risk client and the beneficial owners identified as high-risk clients		
Enhanced ongoing monitoring of a relationship with a high-risk client must be conducted by reviewing Customer information and documents on an annual basis, and		
Identify all known shareholders, with the objective of identifying the ultimate beneficial owner of the client.		

The following clients are considered Low Risk where details of beneficial owners are not required:

1.	Government administrations or enterprises and statutory bodies	
2.	A regulated financial services business based in Mauritius or in an equivalent jurisdiction, but not applicants acting as trustees	
3.	an entity listed on the securities exchange in Mauritius or on Recognised, Designated and Approved Stock/ Investment Exchanges or subsidiaries thereof but subject to adequate regulatory disclosure requirements	
4.	A pension, superannuation or similar scheme which provides retirement benefits to employees where contributions are made by way of deduction from wages and the scheme rules do not permit the assignment of a member's interest under the scheme	

All other clients are medium risk and must follow standard due diligence as per below: