

## CHECKLIST · COMPLIANCE1

# Customer Due Diligence (CDD) Checklist — Real Estate

Use this checklist for every new customer engagement (vendor or purchaser) and refresh it whenever a trigger event occurs.

## 1. Identify the customer

- Full legal name
- Date of birth
- Residential address (verified, not PO Box)
- Company / trust / partnership name and registration number (if not an individual)

## 2. Verify identity

- Government-issued photo ID sighted and copy retained
- Secondary proof of address (utility bill, bank statement < 3 months old)
- For entities: certificate of incorporation / trust deed / partnership agreement
- Electronic verification result (where used) saved to file

## 3. Beneficial ownership

- Identify all natural persons owning  $\geq 25\%$  of the entity
- Identify any person exercising effective control
- Document the ownership chain (org chart for layered structures)
- Verify identity of each beneficial owner to the same standard as the customer

## 4. Nature & purpose of the relationship

- Type of transaction (sale, purchase, lease)
- Source of funds for the transaction
- Source of wealth (for higher-risk customers)
- Expected transaction value

## 5. Risk rating

- Customer risk score recorded (Low / Medium / High)
- PEP screening completed
- Sanctions screening completed
- Adverse media check completed

## 6. Ongoing CDD

- Trigger events documented (change of ownership, unusual activity, refresh date)
- Next review date scheduled

■ Compliance Officer sign-off

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