

## CHECKLIST · COMPLIANCE1

# AML/CFT Risk Assessment Template — Real Estate Agency

A structured template to help your agency document its money-laundering and terrorism-financing risk.

## A. Business profile

- Legal name and trading names
- Branches / offices
- Number of licensees and admin staff
- Services offered (residential sales, commercial, property management, auctions)
- Average and maximum transaction size

## B. Risk factors to assess (score Low / Medium / High)

### ### 1. Customer risk

- Resident vs. non-resident clients
- Individuals vs. corporates / trusts / nominees
- Politically exposed persons (PEPs)
- Cash-intensive industries
- Customers reluctant to provide documentation

### ### 2. Product / service risk

- Cash deposits accepted
- Off-the-plan purchases
- Auctions
- Property management trust accounts
- Cross-border transactions

### ### 3. Channel / delivery risk

- Face-to-face onboarding
- Remote / electronic onboarding
- Use of intermediaries (lawyers, accountants)

### ### 4. Geographic risk

- Locations of customers and properties
- Cross-border source of funds
- Exposure to FATF high-risk jurisdictions

### ### 5. Institutional risk

- Banking partners
- Payment service providers used
- Conveyancers and law firms relied on

## C. Mitigation

For each risk rated Medium or High, document the controls in place (enhanced CDD, additional approvals, monitoring frequency).

## D. Sign-off

- Prepared by: \_\_\_\_\_
- Reviewed by Compliance Officer: \_\_\_\_\_
- Approved by Principal / Director: \_\_\_\_\_
- Date: \_\_\_\_\_
- Next review date: \_\_\_\_\_

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