



# FINANCIAL INTELLIGENCE AUTHORITY

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Circular No. 001/2022

Date: May 24, 2022  
To: Money Services Businesses Holding Classes A to D Licences  
Re: Inclusion of Sub-Agents in AML/CFT/CPF Programmes

Pursuant to section 16(1)(o) of the Money Laundering (Prevention) Act, as amended, Money Services Businesses (MSBs) are required to develop Anti-Money Laundering, Countering the Financing of Terrorism and Counter Proliferation Financing (AML/CFT/CPF) programmes, inclusive of internal policies, procedures and controls.<sup>1</sup>

To this end, this circular serves to inform the relevant MSBs that their subagents must be included as part of their AML/CFT/CPF programmes and must be monitored for compliance with these programmes. This includes, assessing the sub agents as part of the money laundering (ML), terrorist financing (TF) and proliferation financing (PF) Risk Assessments and Independent Audits conducted by the MSB.

Please be guided accordingly.

Yours Sincerely,

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**Paul Thompson**  
**Director**

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<sup>1</sup>[https://www.slufia.com/files/Guidance%20on%20Developing%20an%20AML\\_CFT\\_CPF%20Programme\\_1.pdf](https://www.slufia.com/files/Guidance%20on%20Developing%20an%20AML_CFT_CPF%20Programme_1.pdf)