



# AML TENDER

JUST/2018/JACC/PR/CRIM/018

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Development and Organisation of Training for Lawyers  
on Anti-money Laundering and Counter Terrorist  
Financing (AML-CTF) Rules at EU Level

## MODEL TRAINING PROGRAMME

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22 February 2021

### Disclaimer



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# MODEL TRAINING PROGRAMME

- **INTRODUCTION** (5 minutes)

A brief introduction to the course, its purpose and structure

- **DEFINITIONS** (15 minutes)

Definitions of money laundering, terrorist financing, and how lawyers are covered by them

- **A RISK-BASED APPROACH** (30 minutes)

Introduction, followed by guidance on how to conduct a risk assessment, including factors relating to the size of firm

- **CUSTOMER DUE DILIGENCE (CDD)** (30 minutes)

Introduction, followed by guidance on timing, levels, reliance on third parties, written procedures and record keeping, companies and trusts

- **BENEFICIAL OWNERSHIP** (20 minutes)

- **HIGH-RISK THIRD COUNTRIES, POLITICALLY EXPOSED PERSONS (PEPS), NON FACE-TO-FACE CLIENTS AND OTHER RED FLAGS** (20 minutes)

- **REPORTING OBLIGATIONS** (45 minutes)

Introduction, followed by guidance on the definition of terms which lead to reporting, and on tipping off

- **DATA PROTECTION** (10 minutes)

- **LAWYER-CLIENT CONFIDENTIALITY** (20 minutes)

A guide to the essential principles, including the consequences of European case-law

- **CROSS-BORDER ISSUES** (10 minutes)

- **SANCTIONS** (15 minutes)

A guide to requirements for an offence

- **CASE STUDIES** (40 minutes)