

The Complete AML Compliance Checklist

Everything HMRC expects from your business — explained in plain English, with every document and process you need to have in place.

For: **Estate Agents · Letting Agents · Accountants · High-Value Dealers**

Based on: Money Laundering Regulations 2017 (as amended) · Draft MLR Amendment Regulations 2025 · HMRC Supervision Guidance · UK Sanctions Regulations 2025 · National Risk Assessment 2025 · ECCTA 2023

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How to Use This Checklist

This checklist covers every anti-money laundering obligation that HMRC expects your business to meet under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017.

It is divided into 11 sections. Each section explains what the requirement actually means in plain English, then tells you exactly what HMRC will want to see if they inspect your business.

Work through each section. If you can tick every box and produce every document listed, you are in a strong position. If you find gaps — and most businesses do — those are the areas that put you at risk of a fine, public naming, or prosecution.

⚠️ 90% of HMRC penalties in the last reporting period were for the most basic requirement: being registered. Don't assume you're covered — check everything.

1. HMRC Registration

Before you do anything else, you must be registered with HMRC for anti-money laundering supervision. Trading without registration is a criminal offence.

If your business carries out estate agency work (as defined by the Estate Agents Act 1979), provides accountancy services, operates as a letting agent handling rents of €10,000 or more per month, or deals in goods with cash transactions at or above €10,000 — you are legally required to register with HMRC.

Registration is not optional. It is not something you do when you get around to it. HMRC has fined hundreds of businesses specifically for trading without being registered, with penalties ranging from £1,050 to over £50,000.

✓ If you are an accountancy service provider: the UK Government confirmed in October 2025 that the FCA will become the Single Professional Services Supervisor for AML/CTF in your sector. HMRC will remain the supervisor for estate agents, letting agents, and high-value dealers. The transition requires primary legislation and will take time to come into effect, but accountancy firms should prepare for changes to how they are supervised.

⚠️ 332 out of 369 penalties in HMRC's most recent enforcement round (April–September 2025) were for this single failing: trading while unregistered.

Your checklist

<input type="checkbox"/>	We are registered with HMRC for AML supervision
<input type="checkbox"/>	Our registration is current and has been renewed on time
<input type="checkbox"/>	We have paid all supervision fees
<input type="checkbox"/>	All responsible persons (directors, partners, beneficial owners) have passed HMRC's fit and proper test

<input type="checkbox"/>	We have our HMRC supervision reference number on file
<input type="checkbox"/>	We would be able to produce proof of registration within minutes if asked

WHAT HMRC WANTS TO SEE

▶	HMRC supervision confirmation letter or email
▶	Proof of fee payment (receipt or bank statement)
▶	Fit and proper test approval for every responsible person
▶	Your unique supervision reference number

2. Firm-Wide Risk Assessment

This is the foundation of your entire compliance framework. HMRC will ask to see it first — and everything else should flow from it.

A risk assessment is a written document that identifies the specific money laundering and terrorist financing risks your business faces. Not generic risks — your risks. Based on your location, your client types, the kind of transactions you handle, and the areas you operate in.

For example: an estate agent in central London handling £2M+ sales to overseas buyers faces very different risks than a letting agent in a market town. Your risk assessment must reflect that difference. A generic template downloaded from the internet will not pass an HMRC inspection.

HMRC expects this document to be reviewed at least annually, and updated whenever something material changes — new office location, new service line, changes in client mix, or changes in the law.

✓ *The National Risk Assessment of Money Laundering and Terrorist Financing 2025 (published July 2025) confirms that property transactions are assessed as high-risk and appear in almost every money laundering typology. Your risk assessment should reference the NRA and explain how its findings apply to your business.*

⚠ **HMRC has been explicit: generic, off-the-shelf risk assessments are not acceptable. They must be specific to your business.**

Your checklist

<input type="checkbox"/>	We have a written, firm-wide risk assessment
<input type="checkbox"/>	It is specific to our business — our location, our clients, our transaction types
<input type="checkbox"/>	It identifies the money laundering and terrorist financing risks we face
<input type="checkbox"/>	It covers proliferation financing risks (required since June 2022)
<input type="checkbox"/>	It explains the measures we take to mitigate each identified risk

<input type="checkbox"/>	It has been reviewed in the last 12 months
<input type="checkbox"/>	It is signed and dated by a senior person in the business
<input type="checkbox"/>	It references the National Risk Assessment 2025 and explains how its findings apply to our business
<input type="checkbox"/>	It would make sense to someone reading it for the first time

WHAT HMRC WANTS TO SEE

▶	Written risk assessment document with your business name, date, and signatory
▶	Evidence of annual review (version history, review dates, or sign-off records)
▶	Reference to specific risk factors: geographic areas, property values, client nationality, transaction methods, cash handling
▶	Clear link between each risk identified and the control you have in place to mitigate it

3. Policies, Controls & Procedures

Your risk assessment says what the risks are. Your policies and procedures say what your team actually does about them, step by step.

This is your AML manual. It tells every person in your business exactly what they need to do, when, and how. When to check ID. How to verify source of funds. What to do if something looks suspicious. Who to report it to. How to keep records.

The key word is “written.” If your approach to AML is “we just know what to do” or “it’s common sense,” that will not satisfy HMRC. They want to see a document that any new member of staff could read and follow from day one.

Your policies should directly reflect the risks identified in your risk assessment. If your risk assessment says overseas buyers are a higher risk, your procedures should include specific steps for handling overseas buyers.

Your checklist

<input type="checkbox"/>	We have a written AML policy document
<input type="checkbox"/>	It includes procedures for customer due diligence (CDD)
<input type="checkbox"/>	It includes procedures for enhanced due diligence (EDD) for higher-risk situations
<input type="checkbox"/>	It includes procedures for reporting suspicious activity internally
<input type="checkbox"/>	It covers ongoing monitoring of business relationships

<input type="checkbox"/>	It specifies how we screen clients against the UK sanctions list
<input type="checkbox"/>	It explains our record-keeping requirements and retention periods
<input type="checkbox"/>	It names who is responsible for AML compliance in the business
<input type="checkbox"/>	It has been communicated to all staff
<input type="checkbox"/>	It is reviewed and updated at least annually

WHAT HMRC WANTS TO SEE

▶	Complete AML policy and procedures manual
▶	Evidence that the policy has been shared with all staff (sign-off sheet, email record)
▶	Version control showing the policy is reviewed regularly
▶	Cross-reference to the risk assessment showing the procedures match the risks

4. Nominated Officer (MLRO)

Every business supervised by HMRC must appoint a Nominated Officer. This is the person your team reports suspicious activity to — and who decides whether to file a report with the National Crime Agency.

The Nominated Officer is sometimes called the Money Laundering Reporting Officer (MLRO). In a small business, this is often the owner or principal. In a larger firm, it should be someone senior enough to make decisions but close enough to day-to-day operations to understand the risks.

This person must be named, their role must be documented, and every member of staff must know who they are and how to report to them. If you have more than one office or a team of more than a few people, you should also appoint a Deputy Nominated Officer.

The Nominated Officer must understand the law well enough to assess whether a suspicious activity report (SAR) needs to be submitted to the National Crime Agency. They also need to understand that “tipping off” — telling a client that a report has been made — is a criminal offence.

Your checklist

<input type="checkbox"/>	We have appointed a Nominated Officer by name
<input type="checkbox"/>	Their role and responsibilities are documented in writing
<input type="checkbox"/>	We have a Deputy Nominated Officer (if applicable)
<input type="checkbox"/>	All staff know who the Nominated Officer is and how to reach them

<input type="checkbox"/>	The Nominated Officer understands the SAR process and tipping-off rules
<input type="checkbox"/>	There is a clear internal process for staff to report concerns to the Nominated Officer
<input type="checkbox"/>	The Nominated Officer's appointment is recorded in our AML policy

WHAT HMRC WANTS TO SEE

▶	Written terms of reference for the Nominated Officer role
▶	Name and contact details of the Nominated Officer (and Deputy) in your AML policy
▶	Evidence that staff have been informed (training records, staff handbook, email)
▶	Internal reporting form or procedure for raising concerns

5. Customer Due Diligence (CDD)

This is the core of AML compliance. Before you do business with someone, you must verify who they are, understand what they want to do, and check that their money is legitimate.

Customer due diligence means three things: verifying the client's identity, understanding the purpose and intended nature of the business relationship, and establishing the source of funds being used in the transaction.

For individuals, this means checking government-issued photo ID (passport, driving licence) and proof of address (utility bill, bank statement dated within the last three months). For companies, it means identifying the directors, the beneficial owners (anyone with 25% or more ownership), and verifying the company's registration.

CDD must be carried out at the start of the business relationship — not after the transaction is underway. If you cannot complete CDD, you must not proceed with the transaction.

✓ *Companies House identity verification is rolling out through 2026 under the Economic Crime and Corporate Transparency Act 2023 (ECCTA). Directors and beneficial owners will need to verify their identity with Companies House. This strengthens your CDD on company clients — you should check whether directors have verified their identity on the Companies House register as an additional data point.*

⚠ **You must apply CDD to every client on every transaction. There are no exceptions for repeat clients, friends, or people you've known for years.**

Your checklist

<input type="checkbox"/>	We verify the identity of every client before proceeding with a transaction
<input type="checkbox"/>	For individuals: we collect government-issued photo ID and proof of address

<input type="checkbox"/>	For companies: we identify directors, beneficial owners (25%+ threshold), and verify incorporation
<input type="checkbox"/>	For trusts: we identify trustees, beneficiaries, and the settlor
<input type="checkbox"/>	We establish the source of funds for every transaction
<input type="checkbox"/>	We understand and document the purpose of each transaction
<input type="checkbox"/>	We have a process for what to do if CDD cannot be completed (refuse the business)
<input type="checkbox"/>	We verify identity using reliable, independent sources (not just what the client tells us)
<input type="checkbox"/>	We use electronic verification tools or certified document copies where appropriate
<input type="checkbox"/>	For company clients, we check Companies House for director identity verification status (ECCTA 2023)
<input type="checkbox"/>	Our CDD process is documented step by step in our procedures manual

WHAT HMRC WANTS TO SEE

▶	Copies of identity documents for every client (passport, driving licence, utility bills)
▶	Company searches (Companies House records, ownership structure diagrams)
▶	Source of funds documentation (mortgage offer, bank statements, gift letter, sale proceeds)
▶	File notes explaining the nature and purpose of each transaction
▶	A completed CDD checklist for every client file
▶	Evidence of electronic verification results (if used)
▶	Records of any cases where CDD could not be completed and the business was refused

6. Enhanced Due Diligence (EDD)

Some clients and transactions carry higher risk. For these, basic CDD is not enough — you need to dig deeper.

Enhanced due diligence is required when the risk of money laundering is higher than normal. This includes situations where the client is a Politically Exposed Person (PEP), where the transaction involves a high-risk country, where the ownership structure is unusually complex, where large cash sums are involved, or where something about the transaction doesn't feel right.

EDD means going beyond standard checks. You might need to verify the client's source of wealth (not just source of funds for this transaction, but how they accumulated their wealth generally). You might

need more detailed documentation, more senior sign-off, or more frequent monitoring of the relationship.

Your risk assessment should define what triggers EDD in your business and your procedures should explain exactly what additional steps to take.

⚠ Incoming change (early 2026): The draft MLR Amendment Regulations 2025 will narrow “high-risk third countries” to the FATF black list only (currently includes the grey list). They also clarify that EDD is only required for “unusually complex or unusually large” transactions, not all complex or large ones. Review your EDD triggers once the final regulations are laid before Parliament.

Your checklist

<input type="checkbox"/>	We have defined what triggers EDD in our risk assessment and procedures
<input type="checkbox"/>	We apply EDD for PEPs and their family members and close associates
<input type="checkbox"/>	We apply EDD for clients from high-risk jurisdictions (FATF black list; note the grey list trigger is being narrowed under incoming MLR amendments)
<input type="checkbox"/>	We apply EDD for unusually complex ownership structures
<input type="checkbox"/>	We apply EDD for transactions with no apparent economic purpose
<input type="checkbox"/>	We apply EDD for high-value cash transactions
<input type="checkbox"/>	Our EDD process includes verifying source of wealth, not just source of funds
<input type="checkbox"/>	Senior management sign-off is required for high-risk business relationships
<input type="checkbox"/>	We carry out more frequent ongoing monitoring on EDD clients

WHAT HMRC WANTS TO SEE

▶	EDD file notes explaining why enhanced checks were triggered
▶	Source of wealth documentation (inheritance records, business accounts, investment records)
▶	Additional verification documents beyond standard CDD
▶	Senior management approval records for high-risk client relationships
▶	Evidence of more frequent monitoring on EDD cases
▶	Records of any clients declined or exited due to unacceptable risk

7. Sanctions & PEP Screening

Since May 2025, every estate agent and letting agent must screen every client against the UK sanctions list. This is now a criminal obligation — not a best practice recommendation.

The UK maintains a consolidated sanctions list of individuals and entities that are subject to financial restrictions. Doing business with a sanctioned person — even unknowingly — is a criminal offence carrying up to 7 years' imprisonment and an unlimited fine.

You must also screen for Politically Exposed Persons (PEPs) — individuals who hold prominent public positions (or their family members and close associates). PEPs are not sanctioned, but they carry a higher risk and require enhanced due diligence.

Screening must happen before you establish a business relationship and should be repeated if the relationship continues over time. You need a documented process for what happens when a screening result returns a potential match.

✓ *January 2026 update: All UK sanctions designations have been consolidated into a single official list, updated in one place. This replaces the previous system of checking multiple lists. If you are using an older screening process, verify it now references the consolidated list.*

⚠ **Since May 2025, letting agents are now explicitly covered by UK financial sanctions regulations. Most letting agents we speak to are not yet aware of this change.**

Your checklist

<input type="checkbox"/>	We screen every client against the UK consolidated sanctions list (single list since January 2026)
<input type="checkbox"/>	We screen before establishing a business relationship, not after
<input type="checkbox"/>	We screen all relevant parties: buyers, sellers, landlords, tenants, guarantors, beneficial owners
<input type="checkbox"/>	We screen for PEPs and their family members and close associates
<input type="checkbox"/>	We have a documented process for handling potential matches
<input type="checkbox"/>	We know who to report a confirmed match to (OFSI for sanctions, NCA for PEPs)
<input type="checkbox"/>	We re-screen ongoing business relationships when the sanctions list is updated
<input type="checkbox"/>	We keep records of every screening check, including the date, the tool used, and the result
<input type="checkbox"/>	We have chosen a reliable screening tool or service and can explain why we chose it

WHAT HMRC WANTS TO SEE

▶	Screening records for every client showing date, tool/method, and outcome
▶	Evidence of your screening tool or process (subscription, manual check procedure)
▶	Written procedure for handling a potential or confirmed sanctions match
▶	OFSI reporting records (if any matches have been reported)

▶	Evidence that re-screening happens when the consolidated sanctions list is updated
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8. Suspicious Activity Reporting (SARs)

If you suspect money laundering or terrorist financing — or if you have reasonable grounds for suspicion — you are legally required to report it. Failure to report is a criminal offence.

A Suspicious Activity Report (SAR) is a report made to the National Crime Agency (NCA) when you suspect that a transaction, client, or activity may involve the proceeds of crime or terrorist financing. You don't need to be certain. If something doesn't feel right and you can't explain it, that's enough to trigger a report.

The internal process works like this: a member of staff notices something unusual and reports it to the Nominated Officer. The Nominated Officer assesses the concern and decides whether to submit a SAR to the NCA. The Nominated Officer must act promptly — and must not tell the client that a report has been or may be made (“tipping off” is a criminal offence).

Common red flags include: clients who are reluctant to provide ID, unusually large cash deposits, transactions with no clear economic purpose, funds from unexpected sources, clients who rush to complete transactions, and transactions involving high-risk jurisdictions.

Your checklist

<input type="checkbox"/>	All staff know what constitutes suspicious activity
<input type="checkbox"/>	All staff know how to report a concern internally (to the Nominated Officer)
<input type="checkbox"/>	We have an internal reporting form or process
<input type="checkbox"/>	The Nominated Officer knows how to submit a SAR to the NCA
<input type="checkbox"/>	We understand the rules around tipping off and ensure no client is told about a report
<input type="checkbox"/>	We know that we may need NCA consent to proceed with a transaction after filing a SAR
<input type="checkbox"/>	We keep records of all internal reports and all SARs submitted
<input type="checkbox"/>	Our SAR process is documented in our procedures manual

WHAT HMRC WANTS TO SEE

▶	Internal suspicious activity reporting forms (blank template and any completed)
▶	SAR submission records (NCA reference numbers, dates, details)
▶	Log of all internal disclosures to the Nominated Officer (even if no SAR was filed)

▶	Evidence that the Nominated Officer assessed each disclosure and documented their decision
▶	Records showing no tipping off occurred

9. Staff Training

Every person in your business who could encounter money laundering must be trained. HMRC will ask for proof — not just that training happened, but who attended, when, and what was covered.

Training is not a one-off event. The regulations require that you provide regular training to all relevant employees. “Regular” is not strictly defined, but annual training is considered good practice. Training should also be given to new joiners before they handle any regulated work.

The training must be specific enough to be useful. It should cover: what money laundering is and why it matters, what the regulations require, how to carry out CDD, how to spot red flags, how to report concerns internally, what tipping off means, and what sanctions screening involves.

HMRC won't just check that you held a session. They'll want to see records proving who was there, what was covered, and when it happened. Individual training certificates are the clearest form of evidence.

Your checklist

<input type="checkbox"/>	All relevant staff have received AML training
<input type="checkbox"/>	Training is provided at induction for new joiners
<input type="checkbox"/>	Training is refreshed at least annually
<input type="checkbox"/>	Training covers: AML regulations, CDD procedures, red flags, internal reporting, tipping off, sanctions
<input type="checkbox"/>	Training is specific to our sector and our business (not just generic AML content)
<input type="checkbox"/>	We keep a record of who attended each training session
<input type="checkbox"/>	Each attendee has an individual training certificate
<input type="checkbox"/>	We can demonstrate the content that was delivered (slides, handouts, agenda)
<input type="checkbox"/>	Senior management and the Nominated Officer also receive training

WHAT HMRC WANTS TO SEE

▶	Training attendance records with names, dates, and signatures
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▶	Individual training certificates for every attendee
▶	Training materials (slides, handouts, agenda) showing what was covered
▶	Induction records for new joiners showing AML training was completed before regulated work began
▶	A training schedule or plan showing the frequency of refresher sessions

10. Record Keeping

HMRC will expect to see your records going back five years. If you can't produce them, it doesn't matter how good your processes are — you can't prove anything.

Under the regulations, you must keep copies of all CDD documents, transaction records, and any supporting evidence for at least five years after the business relationship ends or the transaction is completed.

Records must be stored securely but must be retrievable promptly. If HMRC inspects your business, they will expect to see specific client files quickly — not hear that the documents are “somewhere in a filing cabinet” or “on someone's old laptop.”

This also applies to electronic records. If you use digital tools for ID verification or sanctions screening, the results must be saved and accessible. Screenshots, PDFs, or exported reports are all acceptable.

Your checklist

<input type="checkbox"/>	We retain all CDD records for at least 5 years after the business relationship ends
<input type="checkbox"/>	We retain transaction records for at least 5 years after the transaction completes
<input type="checkbox"/>	Records include copies of identity documents, source of funds evidence, and file notes
<input type="checkbox"/>	Records include sanctions and PEP screening results
<input type="checkbox"/>	Records include SAR submissions and internal disclosure logs
<input type="checkbox"/>	Records include training attendance and certificates
<input type="checkbox"/>	Records are stored securely (locked cabinet, password-protected digital storage)
<input type="checkbox"/>	Records are retrievable promptly if requested by HMRC
<input type="checkbox"/>	We have a consistent filing or naming system across all client records
<input type="checkbox"/>	We comply with data protection law (UK GDPR) in how we store personal data

WHAT HMRC WANTS TO SEE

▶	Organised client files with CDD documents, transaction records, and file notes
▶	A clear filing system (physical or digital) with consistent naming
▶	Evidence that records are retained for the required 5-year period
▶	Secure storage (locked cabinets, encrypted digital storage, access controls)
▶	A data retention and destruction policy

11. Ongoing Monitoring

AML compliance is not a one-off exercise. You must continue to monitor your client relationships and transactions throughout the business relationship.

Ongoing monitoring means two things. First, keeping your CDD information up to date — if a client's circumstances change (new beneficial owner, change of address, new source of funds), you need to update your records. Second, scrutinising transactions to ensure they are consistent with what you know about the client.

For example, if a client who has always bought mid-range properties suddenly makes a £5M cash offer with no mortgage, that should trigger a review. If a landlord changes the ownership structure of their property portfolio to a complex offshore entity, that warrants additional checks.

The level of monitoring should be proportionate to the risk. Higher-risk clients need more frequent and more detailed monitoring. Lower-risk clients still need periodic review, but it can be lighter touch.

Your checklist

<input type="checkbox"/>	We review client information periodically to ensure it is still accurate
<input type="checkbox"/>	We monitor transactions to check they are consistent with the client's profile
<input type="checkbox"/>	We have triggers for when a review should be carried out (e.g., new transaction, change of circumstance)
<input type="checkbox"/>	Higher-risk clients are reviewed more frequently
<input type="checkbox"/>	We update CDD records when we become aware of changes
<input type="checkbox"/>	We document the outcome of each review on the client file
<input type="checkbox"/>	Staff are trained to recognise when a client's activity doesn't match their profile

WHAT HMRC WANTS TO SEE

▶	File notes recording periodic reviews of client information
▶	Updated CDD documents where client circumstances have changed
▶	Transaction monitoring records showing scrutiny of unusual activity
▶	Evidence that higher-risk clients receive more frequent review
▶	Records of any actions taken as a result of monitoring (additional checks, SARs, relationship exit)

Regulatory Outlook: What's Changing in 2026

AML regulation does not stand still. Several significant changes are either already in effect or expected in the coming months. If your compliance framework doesn't account for these, it will be out of date before your next HMRC inspection.

Already in effect

<input type="checkbox"/>	Letting agents designated as "relevant firms" for financial sanctions purposes (May 2025) — mandatory screening of all landlords, tenants, and guarantors
<input type="checkbox"/>	UK consolidated sanctions list launched (January 2026) — all UK sanctions designations now maintained in a single list, replacing the previous multi-list system
<input type="checkbox"/>	National Risk Assessment 2025 published (July 2025) — property transactions assessed as high-risk across almost every money laundering typology
<input type="checkbox"/>	HMRC enforcement at record levels — 369 penalties totalling £1.88M in the most recent reporting period (April–September 2025)

Expected in 2026

<input type="checkbox"/>	MLR Amendment Regulations expected to be laid before Parliament in early 2026 — narrowing high-risk third countries to FATF black list only, clarifying EDD triggers, aligning CDD thresholds for letting agents with high-value dealers
<input type="checkbox"/>	Companies House identity verification rollout (ECCTA 2023) — directors and beneficial owners required to verify identity, strengthening CDD on company structures
<input type="checkbox"/>	FCA confirmed as Single Professional Services Supervisor for accountancy and legal sectors — transition requires primary legislation, but accountancy firms should prepare for a change of supervisor
<input type="checkbox"/>	Euro-denominated thresholds in the MLRs expected to be converted to pounds sterling, removing conversion complexity post-EU exit

⚠️ If your compliance framework was last updated before May 2025, it does not account for mandatory sanctions screening for letting agents, the consolidated sanctions list, or the incoming MLR amendments. It needs updating.

How Did You Score?

Go back through the checklist and count how many boxes you can honestly tick — with the evidence to back them up.

SCORE	STATUS	WHAT IT MEANS
90–100%	Strong	You're in good shape. A professional review could still catch blind spots, but you're ahead of most businesses in your sector.
70–89%	Gaps exist	You have the basics but there are areas that would concern HMRC on inspection. These gaps are fixable quickly.
50–69%	Significant risk	You are exposed to fine and public naming. Multiple areas need attention before you'd be comfortable with an inspection.
Below 50%	Urgent action needed	If HMRC inspected tomorrow, you would likely receive a penalty. This is the position most businesses are in before they work with us.

Most businesses we work with score between 30–60% on their first pass. That's not a judgement — it's the reality of a sector where the regulations are complex, constantly changing, and nobody has explained them properly.

We Build Everything on This Checklist

If you've found gaps — or if the thought of assembling all this evidence yourself feels overwhelming — that's exactly what we do.

The Inspection-Ready System

We come to your office, review what you've got, identify the gaps, and build everything HMRC expects to see — bespoke to your business, your clients, and your area. Not a template. Not a generic manual. A complete compliance framework built by someone who spent a decade in tier-1 banking compliance, including second line of defence roles at Deutsche Bank and NatWest.

What's included

<input type="checkbox"/>	Bespoke firm-wide risk assessment — specific to your business
<input type="checkbox"/>	Complete AML policy and procedures manual
<input type="checkbox"/>	CDD and EDD checklists for every transaction type you handle
<input type="checkbox"/>	Sanctions and PEP screening setup with documented process
<input type="checkbox"/>	Nominated Officer framework with terms of reference and SAR templates
<input type="checkbox"/>	Half-day staff training with individual certificates and attendance records
<input type="checkbox"/>	HMRC registration support (if needed)
<input type="checkbox"/>	The HMRC Inspection File — every document tabbed and indexed in the order HMRC requests
<input type="checkbox"/>	Inspection Day Playbook — what they ask, what they're really testing, what to say
<input type="checkbox"/>	New Joiner AML Induction Pack — ready for every future hire
<input type="checkbox"/>	Suspicious Activity Response Toolkit — one-page flowchart for your team
<input type="checkbox"/>	90-day support line — call or email with any compliance question
<input type="checkbox"/>	Quarterly regulatory alerts — any changes that affect your sector, delivered to your inbox

The Inspection-Ready Guarantee

If HMRC inspects your business within 12 months of our build and identifies any deficiency in the compliance framework we created, we rebuild it at no additional cost and provide a full day of our time to remediate. Full guarantee terms provided before engagement.

Start With a Free Gap Report

We'll come to your office for 20 minutes, review your current setup against this checklist, and give you a written gap report on the spot. You keep it whether or not we work together. No cost, no obligation.

Book your free gap report:

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