



**QUESTIONNAIRE TO ASSIST IN DEVELOPING A RISK BASED APPROACH
NON-PROFIT ORGANISATIONS**

This questionnaire is designed to obtain information on the nature of operations, structure, activities and procedures so as to determine the specific money laundering, terrorist financing and proliferation financing risk exposure of each Non-profit Organisation operating in Trinidad and Tobago. Kindly complete each section. Where the question does not apply, please indicate by responding accordingly (that is, 'N/A').

You may attach a separate sheet to provide all the relevant information for each question. Make sure to indicate which question the respective information belongs.

PART A Entity Information

A.1 Non-Profit Organisation's (NPO) Name: _____

NPO's main office address or place of operation in Trinidad and Tobago:

NPO's mailing address (if different):

A.2 Contact information for NPO:

Business telephone: _____ Business fax: _____

E-mail: _____ Website: _____

A.3 Name and contact information of the Controller:

(Please include information for other Controllers on a separate attachment.)

Last Name: _____ First Name: _____

Phone contact: _____ Business fax: _____

Mobile #: _____ E-mail: _____

A.4 Does the NPO operate at more than one office/location in Trinidad & Tobago? YES NO

A.5 If you answered 'Yes' to question A.4, provide the name and address of each branch/location.

BRANCH	ADDRESS

Table 1: Additional Branches/Offices

A.6 Indicate using percentage, what is/are the type/s of activities performed by the NPO? (use estimates if necessary)

TYPE OF ACTIVITY	% OF ANNUAL ACTIVITIES/SERVICES	TYPE OF ACTIVITY	% OF ANNUAL ACTIVITIES/SERVICES
HOUSING		SPORTS AND RECREATION	
SOCIAL SERVICES		ARTS AND CULTURE	
EDUCATION		ADVOCACY	
HEALTH CARE		OTHER (Please specify)	

Please provide a brief explanation of the nature of activities/services provided.

A.7 Is the NPO engaged in any business activity listed in the First Schedule of the Proceeds of Crime Act, Chap 11:27 (Appendix I)? **YES** **NO** If "YES", please list the activity/ies and provide the names of and addresses of the businesses."

A.8 Does the NPO own, is associated with or affiliated to any other businesses subject to the First Schedule of the Proceeds of Crime Act, Chap 11:27 (Appendix I)? **YES** **NO** . If yes, what are the names and addresses of these entities?

A.9 Does the NPO have a parent body or is affiliated with any other NPO (local or international)? **YES** **NO** . If yes, state the names, addresses, purpose and activities of these NPOs?

No	Names	Address	Purpose	Activities
1				
2				
3				

A.10 What is the name and address of the NPO's primary bank?

Bank Name: _____

Bank Address: _____

A.11 What is the name and address of the NPO's secondary bank?

Bank Name: _____

Bank Address: _____

A.12 What was the NPO's estimated annual income for the previous fiscal?

TT\$0 – TT\$299,999 TT\$300,000 – TT\$499,999 TT\$500,000 – TT\$1,999,999
 TT\$2,000,000 – TT\$3,999,999 TT\$4,000,000 - TT\$9,999,999 TT\$10,000,000 and over

A.13 What was the NPOs' annual inflow, outflows and asset size for the last three (3) years?

YEAR	ANNUAL INFLOW	ANNUAL OUTFLOW	ASSET SIZE

A.14 Has the NPO implemented a limit/threshold for receipt of cash or currency receipts? **YES** **NO**
 If yes, what is the approved limit/threshold? [Currency means cash (bank notes and coins), Travellers cheques, Bearer Bonds, Money Orders and Postal Notes, Virtual Assets (Bitcoin, etc)].

A.15 What percentages of last year's receipts were derived from the following methods of payment: (Please indicate an annual estimate of the percentage of payments received in each category in Table 3 below)?

TYPE OF PAYMENT	% OF ANNUAL INCOME
Cash	
Cheque	
Credit Card	
Debit Card	
Wire Transfer	
Money Remittance	
Standing Orders	
Virtual Assets	
Other [Money Orders, Postal Notes, Bearer Bonds, Internet, travellers cheque (please specify)]	
In kind (e.g food items, vehicles etc.)	
Gift or Donations	

Table 3: Types of Payment

A.16 What is the estimated value of outflows and inflows in the last fiscal were sent to or received from foreign jurisdictions?

Outflows: _____ Inflows: _____

A.17 Briefly explain how are payments verified by the NPO?

A.18 Indicate the number of unusual, complex and/or large transactions valued TT\$90, 000.00 and over conducted within the past 12 months. *(TT\$90,000.00 refers to one transaction or two or more transactions of which together the total value is TT\$90, 000.00 or more).* _____

A.19 Please indicate in the order of priority the top three (3) primary sources of income below (E.g. Government subventions, Donations, Membership dues, etc.):

No.	Source of Primary Income	% of Primary Income
1.		
2.		
3.		

A.20 Indicate the number of staff and/or volunteers of the NPO *(attach organisational chart if one exists)*.

STAFF: _____ VOLUNTEERS: _____

A.21 What is the average period of employment? (years and or months): _____

A.22 What is the process for recruitment?

Part B Compliance Officer Information

B.1 Has your organisation appointed a Compliance Officer or alternate Compliance Officer responsible for implementing your compliance regime to meet its AML/CFT obligations? **YES** **NO**

B.2 If you answered 'Yes' to B1, provide the name, position/job title that the compliance officer holds in the NPO [Controller, CEO, CFO, Senior Manager, Director, Supervisor, Compliance Officer].

B.3 To whom does the compliance officer report? [e.g. Board of Directors, etc]

B.4 What AML/CFT training has the compliance officer received in detecting suspicious transactions relevant to the business operations? _____

B.5 What are the AML/CFT duties of the Compliance Officer? [Tick all that apply.]

- Implementing the entity's AML/CFT program and procedures;
- Updating and maintaining the AML/CFT program and procedures;
- Training staff about AML/CFT;
- Screening staff prior to employment;
- Responding to requests from the FIU;
- Monitoring members activity to identify suspicious transactions;
- Conducting further enquiries on high-risk members;
- Sighting and recording identification for members;
- Receiving reports from staff on suspicious transactions;
- Reporting suspicious transactions to the FIU.

B.6 What other duties does the Compliance Officer have in the NPO? [Specify]:

Part C Compliance Policies and Procedures Information

C.1 Has the NPO developed or implemented an AML/CFT compliance programme? YES NO
If yes, provide a copy of the Compliance Programme approved by senior management.

C.2 Has your organisation conducted transactions within the last 12 months with any of the following?
 members, individuals or companies based in any of the countries listed by the Financial Action Task Force (FATF) as Non- Co-operative Countries or Territories (NCCT) (See list on FIU website www.fiu.gov.tt)(See attached Appendix B)?
 individuals or other persons who are politically exposed persons (PEPs)?

C.3 If you selected any option in C.2, which countries were involved and how many transactions were conducted with each country? Also indicate the number of PEPs with whom transactions were conducted.

C.4 Does your organisation cross-reference the names of staff, donors or volunteers with any list of designated individuals or entities distributed by the FIU? (UN2253/Trinidad and Tobago Consolidated List of Court Orders/Economic Sanctions Orders)? YES NO

C.5 If yes, state which lists were checked.

C.6 How often are transaction records reviewed for suspicious patterns of activity?

Fortnightly []; Quarterly []; Bi-annually []; Annually []

Part D Client Identification

D.1 What identification information does the NPO collect from donors? [Tick all that apply.]

- [] Full name
- [] Residential address
- [] Proof of Address
- [] Date of birth
- [] Place of birth
- [] Nationality
- [] Nature and Place of Business/Occupation (where applicable)
- [] Occupational Income (where applicable)
- [] Source of funds
- [] Phone number
- [] Other [Specify other]

D.2 Has the organisation conducted Enhanced Due Diligence (EDD) on any donor or volunteer within the last 12 months? **YES** **NO**

If 'Yes', please provide the category of members and how many in each category. (e.g. Foreign members, PEPS)

D.3 Who in the NPO is responsible for conducting EDD?

Part E AML/CFT Compliance Training

E.1 Has AML/CFT training been received by the controller/s, volunteers or staff? **YES** **NO**

If yes, provide details of the most recent training received.

E.2 Who received the training? (E.g. all staff, senior staff, other.) [Specify other]

E.3 Who ensures that staff is following AML/CFT procedures?

E.4 Did the training give examples of methods to launder money/finance terrorism through NPOs?

YES NO

E.5 If you answered 'Yes' to E.5 describe some of the examples.

E.6 To whom do employees/volunteers refer unusual or large transactions for approval before they are accepted?

E.7 Who ensures that staff/volunteers is/are aware that they **must not** disclose to any member that they have or intend to report a suspicion to the Compliance Officer?

E.8 Who ensures that staff understands that they are not liable for civil or criminal proceedings against them for making a report in good faith?

Part F Record Keeping

F.1 Describe any system which the organisation has implemented to record and/or monitor transactions?

F.2 What system does your organisation use for storing information on donors identification information or transactions? (E.g. Electronic or manual) [Please provide details.

F.3 For how long is the information kept? _____

Part G Reporting

G.1 Briefly explain the systems developed and implemented to identify and report transactions suspected to be related to money laundering, financing of terrorism or proliferation financing.

G.2. How many cash, donation or gift transactions (receipt or payment) of TT\$90,000.00 and over were conducted within the last 12 months? (TT\$90,000.00 refers to one transaction or two or more transactions of which together the total value is TT\$90, 000.00 or more)

Part H Review of Compliance Policies and Procedures

H.1 How is the effectiveness of your organisation's AML/CFT policies and procedures determined?

H.2 Has a review assessment already been conducted for your NPO's AML/CFT policies and procedures by an external auditor? **YES NO**

If yes, was a copy provided to the FIU? **YES NO**
If no, please attach a copy with this completed questionnaire.

Part I Oversight by the Board of Directors/Controller/Senior Management

I.1 Is the Compliance Programme approved by the Board of Directors/Controller/Senior Management?

YES NO

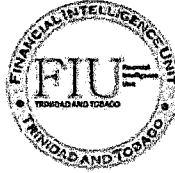
If yes, what is the approved date? _____

I.2 How frequently are Board Meetings held and are meetings minuted? **YES NO**

Dated this _____ day of _____, 20____

Name of Controller: _____

Signature: _____



LIST OF FIU SUPERVISED SECTORS

Supervised Entities are those Non-Regulated Financial Institutions and Listed Businesses which are required to register with the FIU under the **Financial Intelligence Unit Act, Chap 72:01 (as amended)**, namely:

- | | |
|---|--|
| <ul style="list-style-type: none"> * Co-operative Societies * Building Society * Real Estate * Motor Vehicle Sales * Money or Value Transfer Services * Gaming House/Pool Betting * National Lotteries On-Line Betting Games | <ul style="list-style-type: none"> * Jewellery * Private Members' Club * Accountant * Attorney-at-law * Art Dealer * Trust and Company Service Provider * Non-Profit Organisation¹ |
|---|--|

NON-REGULATED FINANCIAL INSTITUTIONS

TYPE OF FINANCIAL INSTITUTION	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
Building Society	A society registered under the Building Societies Act.	Chapter 33:04
Co-operative Societies	A society registered under the Co-operative Societies Act.	Chapter 81:03
Money or Value Transfer Service Provider	A person who carries on money or value transfer services is one who provides a financial service that accepts cash, cheques, other monetary instruments or other stores of value in one location and pays a corresponding sum in cash or other form to a beneficiary in another location by means of a communication, message, transfer or through a clearing network to which the money value service belongs.	

LISTED BUSINESSES

TYPE OF BUSINESS	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
Art Dealer	An individual or company that buys and sell works of any category or art.	
Gaming House and Pool Betting	Any such business registered under the Gambling and Betting Act.	Chapter 11:19
Jewellery	A business licensed under the Licensing of Dealers (Precious Metals and Stones) Act.	Chapter 84:06

¹ In accordance with Act No 7 of 2019, a register of non-profit organizations (NPOs) registered under Section 4 shall be established and maintained by the Registrar General. Further, Section 18B of the FIU Act does not apply to NPOs. Additionally, only NPOs with a gross annual income exceeding Five Hundred Thousand Dollars (TT\$500,000) will be supervised by the FIU.



TYPE OF BUSINESS	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
Attorney-at-law, Accountant or other person performing the functions of an Accountant or other Independent Legal Professional	Such a person is accountable when performing the following functions on behalf of a client: <ul style="list-style-type: none"> (a) buying and selling of real estate; (b) managing of client money, securities and other assets; (c) management of banking, savings or securities accounts; (d) organisation of contributions for the creation, operation or management of companies; and (e) creation, operation or management of legal persons or arrangements, and buying or selling of business entities. 	
Motor Vehicle Sales	Any natural or legal person, firm or partnership, carrying on the business of selling or leasing new or used motor vehicles as defined under the Motor Vehicles and Road Traffic Act.	Chapter 48:50
National Lotteries On-line Betting Games	The business of lotteries operated in accordance with the National Lotteries Act.	Chapter 21:04
Non-Profit Organisations	A body of persons whether incorporated or unincorporated which: <ul style="list-style-type: none"> (a) is established primarily for the promotion of patriotic, religious, philanthropic, charitable, educational, cultural, scientific, literary, historical, artistic, social, professional, fraternal, sporting or athletic purpose or some other useful object and raises or disburses funds for that purpose or object; (b) carries on its business without pecuniary gain to its members or officers except as reasonable compensation for services rendered; and (c) restricts the use of any of its profits or other accretions to the promotion of its purpose or object. 	Act No. 7 of 2019
Private Members' Club	A members' club which is granted a certificate under section 5(4) of the Registration of Clubs Act.	Chapter 21:01
Real Estate	Any natural or legal person, partnership or firm carrying on the business of buying, selling or leasing land and any interest in land or any, buildings thereon and appurtenances thereto.	



TYPE OF BUSINESS	INTERPRETATION	LAWS OF TRINIDAD AND TOBAGO
Trust and Company Service Provider	<p>Any such person when he prepares for and when he carries out transactions for a client in relation to the following activities:</p> <ul style="list-style-type: none">(a) acting as a formation agent of legal persons;(b) acting as (or arranging for another person to act as) a director or secretary of a company, a partner of a partnership or a similar position on relation to other legal persons;(c) providing a registered office, business address or accommodation, correspondence or administrative address for a company, a partnership or any other legal person or arrangement;(d) acting as (or arranging for another person to act as) a nominee shareholder for another person; and(e) acting as, or arranging for another person to act as a trustee of an express trust.	

Source: Proceeds of Crime Act, Chap 11:27 as amended.