

Manual on AML/CFT issued by MOJ

“Message of the Minister”

Introduction

All praise be to Allah, and may prayers and peace be upon the Messenger of Allah, his family, his companions and those who followed him

The importance of combating money laundering and terrorist financing resides in the fact that it is the crime of the century and the most important economic crime faced by countries in the light of the subsequent changes in technology, the accelerated advancement of communication and transfer of information as well as the financial liberalization in international financial markets and international trade markets, which requires international cooperation, comprehensive coordination and implementation of WTO agreements.

The kingdom of Saudi Arabia was keen to pay great attention and conduct due diligence to combat money laundering and terrorist financing through the implementation of relevant procedures and directives. The Council of Ministers issued Decision No. (15) dated on 17/01/1420 H. approving the implementation of AML administrative directives issued by the Financial Action Task Force (FATF) and resolution No. (278) dated on 14/11/1424 H. approving the implementation of necessary executive measures relevant to the forty directives which culminated in the issuance of the Royal Decree No. (m / 31) dated on 11/05/1433 H. approving the AML system to be implemented on financial institutions and designated non-financial businesses and professions, including lawyers.

In this context, it is also necessary to firmly implement an AML system thus, this guide was elaborated to meet the system requirements in accordance with Article 7 thereof, pursuant to the orders of the High Commissioner in this regard and based on the Ministry of Justice’s role in combating money laundering and terrorist financing and the risks thereof on the national economy. The guide was also issued taking into consideration the important role played by lawyers to combat money laundering and terrorist financing, for the purpose of implementing international standards and FATF recommendations. It emphasized on understanding and assessing the risks of money laundering and terrorist financing, conducting due diligence toward traders, keeping records, following the effective reporting procedures in case of suspicion, elaborating internal control mechanisms for this profession, developing a program to combat money laundering and terrorist financing and giving feedback that will help organizations, businesses and professions in taking the corrective action and implement the necessary measures and procedures.

It is also important to establish a balance between AML/CFT requirements and the professional requirements necessary to achieve growth, progress and professional success through expansion and provision of legal services via safe and cost-effectively means and without being abused or exploited by money launderers.

Therefore, the Ministry of Justice approved the issuance of this guide to law firms for combating money laundering and terrorist financing comprising due measures, basic information necessary thereto, requirements and preventive measures associated with the law firms in particular.

And considering the importance of combating money laundering and terrorist financing, It is necessary for the government, financial institutions, security and judicial authorities to meet the requirements and achieve international standards in order to face the adverse economic, political, social and security effects of this crime.

Minister of Justice

Dr. Walid Al-Samaani

The ministry is keen to provide its services and accomplish its functions in accordance with regulatory requirements and effective means to ensure the achievement of the desired results. These tasks include supervising the legal profession and lawyers as an oversight authority over the profession and the practitioners thus embodying the principle of cooperation and coordination in providing their services through communication and exchange of views with relevant AML/CFT parties to gain access to and implement the AML system to which the ministry aspires as an essential mean to raise awareness and increase knowledge among practitioners, the associated trainees and legal consultants for the purpose of improving their performance and help them carry out their assigned role in a professional and regulatory manner, defending and preserving rights, achieving justice and fighting against corruption, namely money laundering and terrorist financing.

This guide only considered the matter of combating ML/TF crime due to the risks it poses on the political, social and economic fields and the extent of its negative impact on individuals, society and the state in general. Furthermore, international requirements gives great priority to this matter in terms in of implementation, adherence, urgent action and measures that need to be adopted as well as the executive mechanisms that need to be established in accordance with international regulations, standards and recommendations issued to combat or prevent the ML/TF crime in the current period with the purpose of achieving actual results subject to such requirements and international controls that will be considered in the assessment of Saudi Arabia in the near future. It is noted that Saudi Arabia seeks membership of FATF as it has now an observer status and it will be granted a permanent member status in Mid-2017. In this regard, the government and the competent authorities began taking required action to complete the accession through the implementation of the recommendations. It issued new regulations as per the provisions of the recommendations and the technical standards contained therein and established competent executive bodies in charge of implementing the regulations and provide assistance to those involved in combating the ML/TF crime such as the permanent team in the Cabinet, the competent authorities. It also established a financial investigation unit in the Ministry of the Interior as a central unit in charge of receiving and handling reports in respect of money laundering activities,

and to implement AML/CTF executive procedures as well as the appropriate preventive measures as stipulated in "FATF agreements."

Legal services are not only linked to combating the ML/TF for being a part within the professional tasks in the fight against corruption in general, the provision of advice and guidance and the protection of others and their customers from illegal acts, but because legal services and attorneys are considered among the involved in implementing the ML system, have regulatory duties and must take preventive measures against ML/TF.

Therefore, this program was prepared as a guidance and cooperation method to achieve the implementation of regulations and professional instructions under the name of Ministry of Justice's Guide to Law Firms for combating ML/TF.

It is a guide for law firms and their employees, a presentation for regulatory actions and procedures that should be followed in for due diligence in taking preventive measures and necessary executive procedures to combat money laundering and terrorist financing.

This program aims to achieve interaction with the program and its implementation, through filling the attached questionnaire, take advantage of your expertise in combating this dangerous problem and understand the obstacles in this area which will be a feedback to analyze the questionnaire, benefit from it in the future and strengthen coordination and cooperation in combating money laundering.

Program's part

First part:

It includes the basic regulatory texts to combat money laundering and the legal instructions and recommendations which are:

- Money Laundering Law issued by the Royal Decree (M/31) dated 11/5/1433 H.
- International standards for combating money laundering and terrorist financing and the proliferation of arms and the recommendations of the Financial Action Task Force (FATF).
- Rules to combat money laundering and terrorist financing regarding the practice of law firms issued by the Ministry of Justice circular No. (13/T/4441) dated 08/01/1433 H.

Second part:

It includes scientific and regulatory guidance sections to combat money laundering and terrorist financing related to the Law Firms, the basis of the program, which includes educational and guidance sections, warnings, instructions and a comprehensive statement about the responsibility of the lawyer towards Anti-Money Laundering.

Third part:

This section is the assessor and feedback of the program and Anti-Money Laundering at the Law Firms based on cooperation and assistance through a comprehensive survey of the program's subjects, direct

questions and everything related to the international standards and guidance recommendations in Anti-Money Laundering.

The guidance part of the program to combat ML/TF for the Law Firms and the required procedures and preventive measures on law firms is divided into sections:

First section: Saudi Arabia's efforts in combating money laundering and terrorist financing.

Second section: International organizations for combating money laundering and terrorist financing.

Third section: Definition of Money Laundering crime.

Fourth section: The lawyer's responsibility according to the Anti-Money Laundering system.

First section: Saudi Arabia's efforts in combating money laundering and terrorist financing.

The Kingdom was keen on combating money laundering and terrorist financing and is considered one of the leading countries in fighting them and working on achieving international requirements and technical standards to combat money laundering via concluding international agreements and participations to combat money laundering. The Kingdom is considered a member of the Financial Action Task Force team known as (FATF) through its membership in the Gulf cooperation Council for which it regularly attends meetings. It is also an observer member which got promoted to permanent member after the assessment.

The Kingdom is a member of the Financial Action Task Force in the Middle East and North Africa known as (MENA-FATF) regularly attending its meetings. The kingdom also ratified in this area the Vienna Convention of 1988 against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, the Arab Convention on the Suppression of Terrorism 1999 and the Organization of Islamic Conference for Combating International Terrorism 1999. The kingdom implemented the requirements of Security Council resolutions on combating the financing of terrorist activities contained in the following resolutions (1267-1333-1368-1373-1390-1455-1456).

The efforts of the Kingdom in the area of Anti-Money Laundering and Terrorist Financing on the international and local levels and its leading role are represented as follows:

1. The Kingdom was among the signatories of the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances approved in 1988 in Vienna.
2. The Kingdom was among the signatories that approved the Arab Convention on the Suppression of Terrorism in New York in 1999.
3. The Kingdom was among the signatories that approved the United Nations Convention against Transnational Organized Crime in Palermo in 2000.

4. The Kingdom implemented all international resolutions in this regard issued by the United Nations Security Council.

5. The Kingdom is a participating member of FATF through its membership in the GCC. It underwent in 2003 a joint assessment by a team from FATF regarding the extent of the Kingdom's implementation of the Forty Recommendations issued by it. The kingdom was among the countries that were assessed according to the new evaluation methodology that was discussed in the plenary session held in 2004 in Paris, where the Kingdom achieved a positive result.

6. The Kingdom participates as a member of MENA-FATF and regularly attends all meetings.

7. It ratified the treaty of the Organization of Islamic Conference for Combating International Terrorism 1999.

Second section: International organizations for combating money laundering and terrorist financing.

Given the importance of cooperation and assistance in combating money laundering crimes and the nations, organizations and associations' joint forces in the fight against this crime, political, economic and legal communities and entities were established to develop controls and standards, determine the necessary procedures, exchange experiences, information and knowledge and cooperate in the fight against this crime; examples of those international organizations and bodies:

1. United Nations: Several agreements have emerged in the field of combating money laundering and terrorist financing, and they are:

- a) Vienna Convention of 1988 against Illicit Traffic in Narcotic Drugs and Psychotropic Substances. It is considered the first international mention regarding the confiscation of proceeds resulting from Narcotic Drugs and Psychotropic Substances trade. It stipulated the criminalization of money laundering, confiscation of proceeds and international cooperation in this.
- b) The Arab Convention on the Suppression of Terrorism in New York in 1999.
- c) The Convention Against Transnational Organized Crime in Palermo in 2000.
- d) UN Security Council Resolution (1377) in September 2000 on combating the financing of terrorism.

2. FATF: Established in 1989, it is a forum of the world's seven most industrialized countries (The Group of Seven (G7)) consisting of (Canada, France, Germany, Italy, Russia, the United Kingdom, and the United States) known as FATF. It includes now 31 members in addition to two organizations: the European Union and GCC. There are more than twenty observer member, fifteen international organizations and associations and five different committees for combating money laundering. It issued in 1990 the Forty Recommendations on Anti-Money Laundering considered the main pillar to combat money laundering around the world upon which the countries wishing to join the Group are assessed. In September 2001, it added 9 recommendations on combating terrorist financing and in 2000, it developed 25 evaluation standards for cooperative and non-cooperative countries in the field of ML/TF which resulted in issuing

the first list of non-cooperative countries. This list is renewed yearly along with the standards to measure the extent of countries' cooperation and compliance with the implementation of these recommendations and the conformity of the legislations and actual practices. Non-cooperative countries shall be charged with economic sanctions.

FATF plays two major roles:

- Develop standards and recommendations related to ML/TF.
- Assess the compliance of the countries with implementing these standards and recommendations.

FATF developed the Forty Recommendations against money laundering and added nine recommendations related to terrorist financing, which confirmed the responsibility of the legal personality from companies, businesses and professions subject to criminal responsibility. It was obliged to take specific actions and file reports regarding suspicious operations.

Most countries aim to join this Group to enjoy the international evaluations and international requirements in order to support and protect their economy through the enactment of legislations and regulations to combat money laundering and terrorist financing in accordance with international standards and the Forty Recommendations. The Kingdom did so.

The results prepared about the Kingdom in this regard during the reports of field visits done by high-level delegation of FATF presided by the head of the Group between 14-17/Shaban 1435 corresponding to June 2015 and the unanimous decision of approval showed that the Kingdom was granted an observer seat in the Group before obtaining the full membership in the future after the periodic assessment in mid 2017.

3. FATF-MENA was established in 2004 in the Kingdom of Bahrain during the ministerial meeting of 14 Arab countries where it was decided to combat ML/TF just like FATF. It is of a cooperative of voluntary nature and initiate its tasks and work via an agreement between members.

4. EGMONT: Established in 1995 by the Financial Intelligence Units and Anti-Money Laundering offices for 116 countries. It plays an essential role in enhancing information exchange and international cooperation between the Financial Intelligence Units and Anti-Money Laundering offices around the world. EGMONT developed the principles and requirements of information exchange in 2001.

5. The Basel Committee on Banking Supervision: Founded in 1974 by the governors of central banks and comprises ten countries. It is under the supervision of the Bank for International Settlements which develops the proper supervisory standards around the world. Therefore, the Committee developed supervisory standards and instructions regarding all the supervisory subjects in banks and the essential principles of supervision in 1997 to validate and implement the principle of "know your client", maintain the records and all information, prevent the opening of current and investment accounts anonymously or without documents, take the necessary measures to save the documents, evaluate and manage the risks, report the suspicious operations and comply with the effective reporting controls.

6. IOSCO is related to the capital market and its regulators where the organization made a series of 30 principles to organize the capital markets of member countries in order to achieve three goals:

- Protect investors
- Ensure that these markets achieve justice, efficiency and transparency of transactions
- Minimize the risks arising from financial transactions

In addition to its 1998 principles and essential standards for securities' legislations regarding the importance of a comprehensive legislative framework to fight illicit activities and the importance of developing proper policies and procedures for financial supervision by institutions operating in the field of securities.

7. IAIS (Zurich - Switzerland): It guided insurance companies in 2000 and determined their obligations and responsibilities.

8. Wolfsburg Group: A group of international banks that established in Switzerland a federation of twelve international banks. It organizes the banking sector in the world through four main groups including eleven principles regarding Anti-Money Laundering and those related to correspondent banks, supervision, review and audit.

Third Section: Definition of the money laundering crime.

It contains a definition of the money laundering crime as well as its aspects and stages. In general, money laundering crimes are illicit activities to disguise the real source of illicit resource and other actions of camouflage to make the income or proceeds look like they are obtained from a legitimate source.

However, in anti-money laundering system, it was defined as follows: "to commit or attempt any act meant to illicitly conceal or disguise the origin of the acquired funds and make them look like they are obtained from a legitimate source".

The system did not only define the crime but added actions that consider the person who commit them a money laundering crime committer, and they are as follows:

1. Perform any funds or proceeds operation, with the knowledge that they result from a criminal activity or from an illegal or irregular source.
2. Transfer or obtain or use or save or receive funds or proceeds, with the knowledge that they result from a criminal activity or from an illegal or irregular source.
3. Disguise the nature or source or movement or property of funds or proceeds, with the knowledge that they result from a criminal activity or from an illegal or irregular source.
4. Participate via agreement or assistance or incitement or counseling or advice or facilitation or conspiracy or concealing or attempt to commit any of the acts set forth in article (2). This

article's regulation showed the criminal activities and the illicit or irregular sources. It also cited 24 of these actions considered as criminal activities.

FATF defined money laundering as: "the transfer of properties with the knowledge that they result from a criminal activity to disguise the illicit asset or help any person in committing this crime to prevent the legal consequences, source, movement, rights or properties with the knowledge that the source is a crime or a person that contributed to it".

Elements of Money Laundering Crime:

The money laundering crime consists of two elements, which are the material and moral elements, in addition to a assumed element, subject of the crime, as follows:

1. The assumed element.

Subject of the money laundering. It is the dirty or illicit or irregular proceeds from crimes stipulated in the AML system and regulations approved by most countries as proceeds from drug trade or weapons, prostitution, human organ trafficking, migrant labor, counterfeit money, abuse of power, crimes of administrative corruption, commercial concealment, tax evasion, smuggling of goods, counterfeit credit cards, terrorism or caused by these crimes, whether directly or indirectly.

Those proceeds are considered a money laundering crime and its assumed element.

2. The material element:

It is determined by the material facts corresponding to the incriminatory text which identified specific actions and behaviors considered one of the criminal acts. The committer is charged with money laundering crime which is a constituent of the money laundering and not the legal facts.

The money laundering crime is defined in the first article as any money or proceeds incurred by the ML crimes including: transfer or acquiring or using or reserving or receiving or wiring or hiding funds, or disguising the nature or source or movement or ownership of the funds or its way of usage.

Or through participation or assistance or agreement or incitement or counseling or advice or facilitation or conspiracy related to any money transaction or proceeds resulted from money laundering.

The law stipulated that initiating the operation is equal to committing money laundering crime.

3. Moral Element.

According to the international standards, the law considered that the essence of the moral element is the general and private criminal purpose of the money laundering crime and stipulated: "with the knowledge that they result from a criminal activity or from an illegal or irregular source". This confirms the achievement of the moral element which is the general criminal meaning, i.e. knowledge and will.

In particular, knowing that it is resulted from a criminal, illegitimate or irregular activity.

Stages of the money laundering crime.

Money laundering is an international and provisional organized crime divided when executed into three different stages:

- Investment or deposit stage.
- coverage or camouflage stage.
- merge or integration stage.

Investment stage:

This is a dangerous stage where funds are invested or introduced to the financial system through banks or financial companies or markets.

Coverage stage:

After the first stage, this one covers, disguises and hides the nature of the funds and their relation with their illicit sources through a complicated series of financial and legal operations so they will be hard to track and discover their origin.

Merge or integration stage:

Laundered money are merged in this stage after the coverage in the economy where it will be hard to differentiate between them and funds resulting from legitimate sources.

Impacts of the money laundering

Money laundering is a dangerous and organized crime with negative impacts on the economy, society and politics. Hereinafter some of the most important impacts:

Economic Impacts

Money laundering crimes cause migration of national funds outside the country which will be deducted from the national income of which are deprived the citizen, the government and the national economy. This will prevent them as well from being invested. This crime leads to a general economic defect due to the decrease of savings with the increase of the random consumption and creating obstacles for the competent authorities in charge of development and economy while executing their tasks to be able to develop future strategies and plans resulting in the economic progress of the country. This will indirectly affect the fair distribution of the national income, since the crime allows for a small portion to obtain high illicit incomes on the expense of the majority which leads to an excess of consumption without an economic reason.

The greatest impact of the money laundering crime is the national currency deterioration since money laundering affects the national currency supply against the increased demand on the foreign currencies, which affects its value in international markets. This will lead to unemployment, damages to the financial markets and obstacles to attract investments benefitting the economy and achieve positive results.

Social and political Impacts

The previous economic impacts are followed by social and political impacts.

The impact of unemployment reaches the society and affects the social and political authorities which makes it harder to provide treatment and education spreading ignorance and diseases.

The money laundering crime affects the economical policy adopted by the political authority as well as the policy it adopts with other countries and its internal policy.

Fourth section: The responsibility of the lawyer according to the anti-money laundering code.

The money laundering law determined the regulatory obligations imposed on the financial and non-financial institutions and businesses, such as the legal services during the practice of the profession because the lawyer is committed to follow the rules mentioned in the money laundering law based on the international recommendations in fighting the money laundering. Among the most important obligations, the necessity to check the identity of the transactors according to the law and its executive regulations, in addition to the issued instructions and the matters related to preserving the records and documents, take internal precautionary and preventive measures, exert due diligence against the suspicious situation of money laundering crimes, follow the effective reporting procedures, find a program to manage and determine the risks in his office and submit the documents upon request by the financial intelligence unit.

The lawyer's detailed responsibility:

1- Following the necessary procedures when creating a professional relation with others.

The lawyer must implement the "know your client" principal according to the international law and recommendations, check the transactors' identity whether a natural or legal person and make sure to perform any transaction with an anonymous or presumed person or someone without the necessary documents to prove the identity; in addition to continuously making sure of the transactors identity, checking the real beneficiaries and following up the law and regulations. Due diligence requires a classification of the lawyer's operations with others on the riskiness and proportional level from high to low risk and enhances tough measures in the classified high risks operations and suspected money laundering or terrorist financing situation and a declining role which requires an internal assessment to determine the risk.

The lawyer must exert due diligence in the high risk situation, lower it with low risk situation and take strict actions in accordance with the law in cases of suspected money laundering. These situation can be divided into three high-risk cases:

Cases according to the nature of the operation.

The operation's nature may be suspicious and requires a due diligence. The Forty Recommendations mentioned some operations that look like money laundering and associated with the following operations:

1. Buy and sell real estate.
2. Manage funds, securities or other assets owned by the customer.
3. Manage bank accounts or savings accounts or securities accounts.
4. Organize the contributions for the purpose of establishing, operating or managing companies.
5. Establish, operate or manage legal persons or legal arrangements, plus purchase and sell commercial bodies.

This was mentioned in the executive regulations of article (2/5) on the necessity of implementing the due diligence towards all customers according to importance and risks; in addition to enhancing measures towards customers and the relation of work and high risk correspondences; or performing effective reporting in case of suspicion.

The same goes for large and complex operations that have no clear economic or legal feasibility, or the fact that the original precedent process was about the sale of real estate, gemstones, jewelry or precious metals, or related to the insurance companies, investment or large commercial companies such as malls.

Cases according to the customer's nationality or the operation.

Countries are classified according to high, medium and low risk countries and the extent of their compliance or non-compliance in implementing the international standards regarding ML/TF. The high risk country is the one which does not implement international standards regarding ML/TF or produces drugs or has secret banking rules. Or those prevented from transactions by the Security Council or Chapter VII of the Charter of the UN. In case of prohibition, it must immediately stop the transaction with it until there is no risk.

Cases according to the customer's position and capacity.

The lawyer, upon performing a transaction with a customer, must evaluate or classify of high risk everyone who has a special post and immunity such as politicians and NGOs. He must also take and enhance measures and implement due diligence.

Therefore, he requires an evaluation of the risks management that includes those cases and there classification. In addition to the determination of the high risk countries and persons, and the

development of a classification in accordance with the international classification; plus the classification of the Security Council, Chapter VII Committee and most importantly FATF.

It is divided into countries of high, medium and low risks, periodically renewed.

2. Taking the necessary measures in order to keep the exchanged registers and papers for any professional operation.

Finding a mechanism in order to keep the registers and files for 10 years after closing the deal or the account. The files of the account should be also kept as well as commercial and professional correspondences and the papers related to the transactors' identities.

3. Taking precautionary measures and internal monitoring of his office.

Article 7 of the anti-money laundering law and its executive regulations stipulated this obligation in order to disclose any of the crimes mentioned in the law and try to abort it and evaluate it on the level of riskiness and commitment to the issued instruction in this field by the regulatory authorities and financial investigations. The regulations stipulated the details of this procedure divided into four procedures that should be abided by as follows:

a- set written and effective regulations to prevent the exploitation of these institutions in the money laundering process and help detect suspicious transactions.

b- the instructions issued by the supervisory authorities is the minimum of applicable instructions.

c- follow up and control to verify of the implementation of the instructions and make sure of the procedures' safety.

d- updating these regulations periodically, to keep pace with the evolution of money laundering.

4- Give special attention to large and complex operations.

The law described it in Article 8 the patterns of unusual transactions that do not have a clear economic or legal purpose. Accordingly, the background of those transactions and their purpose should be checked and the findings should be written down and kept for a period of ten years to be submitted to the competent authorities upon request.

5. Adopting the effective procedures for reporting.

In the cases defined by Article 7 of the law, such as when there is suspicion or when having rational reasons that some or all of the funds represent the proceeds of criminal activity or in association with, or in relation with money laundering, financing terrorism, terrorist acts, terrorist organizations or people financing terrorism, including attempts to conduct such operations, regardless of their value, the following actions should be taken:

- a. To notify immediately and directly the Financial Investigation Unit at the Ministry of Interior directly according to the law and its regulations.
- b. To prepare a detailed report containing all the data and information available to them on that case and relevant parties and to submit it to the investigation unit.

The lawyer is asked to set a mechanism in his office to control transactions and processes in order to detect indicators that show the possibility of the existence of money laundering or suspicion of money laundering, and that the mechanism can be continuously updated to keep pace with the evolution of money laundering and abide by any law issued by regulators in this regard.

As an exception to the principle of professional secrecy, provisions of effective reporting are also applied to the lawyer and he may not use this principle to be excused before the governing laws or those complementing it, while trying to protect the rights from being violated or illegally used through effective notification.

6. Refraining from giving any warning or advice regarding the suspected operations.

It is a negative duty that the lawyer should abide by during the practice of the profession, and when he suspects money laundering in the processes that he is carrying out. He has to send a warning to the transactors of the suspicious process and prepare based on article 11 of the law and what has been stipulated by the executive regulations of the necessary measures in this case and that is to approve the process in form and not reject it and refrain from advising or guiding them or providing alternatives in the operations they perform and refrain from inquiring about the nature of the suspicious transactions except from the unit of financial investigations without showing the transactors that their transaction is under surveillance or review.

7. The lawyer must develop a program to combat ML/TF.

Article 12 and its executive regulations detailed the content of this program:

- Develop policies, procedures and internal controls to combat money laundering and inform his employees in order to implement due diligence, follow their procedures, records and mechanism of detecting suspicious or unusual transactions and commit to that.
- Develop appropriate arrangements for the management of his office and appoint a responsible for executing the duties of combating money laundering and terrorist financing. This responsible must enjoy independent powers from the administration and direct contact powers with a senior administrative chief, review the customer identity and due diligence information in the office and any other related records in time.
- Create a separate auditing and review unit equipped with sufficient resources to test the adherence to these procedures, policies and controls according to the risk rate standard and its assessment .
- Develop training programs for his workers within the office functions to inform them about regulations and instructions on anti-money laundering and developments in this area, which raise their ability to identify those instructions and their patterns and the way to address them.

- Implement inspection procedures to ensure the presence of high efficiency standards when selecting the office employees because they are under the supervision, control and responsibility of the lawyer. He must be responsible for any consequences related to their actions during their work at the office.

The executive regulation of article twelve determines that the responsible of implementing the money laundering law is the board of directors, executive administration, general manager, owner or delegate who is responsible for implementing the provisions, rules and procedures in the money laundering law. He must hire competent and supervisory bodies when developing preventive programs and procedures to know the extent of compliance with the rules and instructions.