A model group protocol

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The following elements constitute a group AML protocol that in my experience satisfies both regulators.

Checklist

- One AML/CFT programme document approved by the boards of both entities, with a Singapore annex mapped to PSN02 and a Swiss annex mapped to the SRO regulations, each annex cross-referenced to the common core.
- A group risk assessment that identifies the customers, products and corridors shared between the entities and the risks arising from the group structure itself, supplementing each entity's own assessment.
- One customer-acceptance policy applying the stricter rule in each row of the divergence table, with a documented list of the exceptions where jurisdiction-specific rules apply (sanctions lists, freeze mechanics, filing procedures).
- One onboarding process generating both entities' documentation from a single data collection, with the Swiss forms built in.
- Separate screening, risk rating and monitoring in each entity, run on shared systems with entity-level access controls and entity-level audit logs.
- A reliance agreement between the entities meeting PSN02 para. 9 and the Swiss delegation rules, reviewed annually.
- A risk-event notification protocol that defines what each entity tells the other on a report, an exit, a freeze or a sanctions hit, in terms that respect s. 57 CDSA and Art. 10a AMLA.
- An intra-group data-transfer agreement satisfying the FADP, the PDPA and Art. 273 SCC, with customer consent language in both entities' terms.
- A single counterparty VASP register and travel-rule configuration applying the full information set and proof of control for unhosted wallets.
- A ten-year retention rule for all compliance records in both entities.
- A coordinated audit calendar under which the Swiss SRO audit and the Singapore independent audit share a findings register and the remediation of each finding is applied in both entities.
- A group compliance committee meeting at least quarterly with both compliance officers and board representation from each entity, minuted.

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