DATA & COMPLIANCE REPORT (DCR) INFORMATION KIT

(updated as at 21 August 2026)

2026

National AML CFT Compliance Programme
Comply To Protect

BANK NEGARA MALAYSIA
CENTRAL BANK OF MALAYSIA

DATA & COMPLIANCE REPORT (DCR) INFORMATION KIT

This document is issued to guide reporting institutions to complete the DCR 2026 only. This document is not intended to replace any requirement of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLA) 2001 and the Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Designated Non-Financial Businesses and Professions (DNFBPs) and Non-Bank Financial Institutions (NBFIs) Policy Document.

Bank Negara Malaysia
30 June 2026

Table of CONTENTS

		PAGE NO.
01	**INTRODUCTION**	
	Brief background on Data and Compliance Report 2026 (DCR 2026)	4
02	**SUBMISSION REQUIREMENTS**	
	Who needs to submit DCR	5
	Infographic - Self-assessment on type of DCR submissions	6
	Infographic - Gazetted Activities	7
03	**FREQUENTLY ASKED QUESTIONS (FAQs)**	
	FAQs on Submission Requirements	9
	FAQs on Dynamic Submissions Portal (DSP)	15
04	**REPORTING CHECKLIST**	
	Checklist for compilation of information or document before submission of DCR 2026	18
05	**DCR REPORTING GUIDE**	
	Guidance on answering the DCR 2026 questions	
	Part A: Information on Reporting Institution	20
	Part B: Business Information and Structure	26
	Part C: AML/CFT/CPF Risk Assessment	52
	Part D: Mandatory AML/CFT/CPF Requirements	54
	Part E: AML/CFT/CPF Compliance Programme	71

INTRODUCTION

The purpose of this document is to guide Reporting Institutions (RIs) in completing the Data and Compliance Report (DCR) 2026.

DCR comprises questions to assess and gain understanding of:

- How RIs have complied with Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing, and Targeted Financial Sanctions (AML/CFT/CPF and TFS) requirements; and
- The level of exposure faced by RIs to money laundering, terrorism financing, and proliferation financing (ML/TF/PF) risks.

DCR is issued pursuant to section 8(3)(a), 16(6) and section 25(2) of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLA) 2001 read together with section 143(2) of the FSA 2013 and section 155(2) of the IFSA 2013. Enforcement action can be taken against non-submission of the DCR.

Upon DCR submission, a report card will be issued highlighting identified gaps, which are intended to help the firm to understand areas for improvement and strengthen its AML/CFT/CPF processes.

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SUBMISSION REQUIREMENTS

APPLICABILITY: WHO NEEDS TO SUBMIT DCR?

DCR 2026 is applicable to the following sectors:

- **Accountants**
- **Company Secretaries**
- **Dealers in Precious Metals or Precious Stones (DPMS)**
- **Registered Estate Agents (REA)**
- **Lawyers**
- **Licensed Gaming Outlets (Gaming)**
- **Moneylenders**
- **Pawnbrokers**
- **Trust Companies (Trust Co)**
- **Factoring Companies**
- **Leasing Companies**

Disclaimer:
RIs are required to submit a DCR as part of the AML/CFT/CPF and TFS compliance obligations. Filling in the DCR does not tantamount to endorsement of the firm's businesses or products. Bank Negara Malaysia does not endorse, approve, register or license the businesses or products or services offered by any RIs.

SUBMISSION

For any enquiries on DCR 2026:
please email dcr@bnm.gov.my

i. **To submit DCR, please log into Dynamic Submissions Portal (DSP) via this link.**

ii. The submission period is from **1 July to 30 September 2026.** Only completed DCRs will be accepted and processed by BNM for subsequent issuance of a report card to the RI.

iii. Please be reminded that all DCR 2026 submissions are final and BNM will not entertain any requests to amend the DCR that has been submitted.

iv. **No extension of timeline will be provided for DCR 2026.**

v. Information submitted by RIs in the DCR 2026 are confidential and will be used by BNM for supervisory purposes and risks assessments. RI is responsible in ensuring information provided is complete and accurate to the best of their knowledge.

Note:
RIs are advised to use the DCR and its corresponding report card issued as self-assessment tools to help identify gaps and areas of improvements in complying with the AML/CFT/CPF requirements.

Please use the self-assessment provided in the next page to guide you in choosing the correct DCR submission for your firm

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SELF-ASSESSMENT ON TYPE OF DCR SUBMISSION

WHICH SECTOR ARE YOU IN?

ACCOUNTANT | COSEC | DPMS | LAWYER | REA

FACTORING | LEASING | GAMING | MONEY LENDER | PAWN BROKER | TRUSTCO

ARE YOU ANY OF THE FOLLOWING?

1. **An internal company secretary, lawyer (i.e. legal officer), or accountant?**
2. **A firm that has been selected and informed of 2025 and 2026 on-site examination and off-premise examination?**

YES → **NOT REQUIRED TO SUBMIT DCR 2026**

NO ↓

DOES YOUR FIRM FULFILL ANY OF THE FOLLOWING CRITERIA?

1. **No longer in operation/ dormant/ in the process of striking off/ winding up or liquidation** in 2024, 2025 and 2026
2. **No new and existing transaction/client** for the entirety of 2024 and 2025, i.e., inactive firms, newly incorporated/registered firms in 2026
3. **Lawyer/Accountant/Trust Company**: Do **not** provide Gazetted Activities in 2024 and 2025
4. **Registered Estate Agent:** Holds an Estate Agency licence issued by BOVAEP and carries out activities as defined under the Valuers, Appraisers, Estate Agents and Property Managers Act 1981 but **did not perform** any estate agency activities in 2024 and 2025

YES → **CATEGORY A: SUBMIT DECLARATION FORM 2026**

NO ↓

CATEGORY B: SUBMIT DCR FORM 2026

GAZETTED ACTIVITIES

The following Gazetted Activities are applicable to lawyers, accountants (external) as stipulated under paragraph 3.3 of the Policy Document. Please note that examples cited below are **non-exhaustive**.

LAWYER

GA I — Buying and selling of immovable property

Examples: (non-exhaustive)

- Advisory services related to buying and selling of real property
- Preparation of legal documents to facilitate buying and selling of immovable property
- Facilitating payments for buying and selling of immovable property

ACCOUNTANT

GA IV — Organising of contributions for the creation, operation or management of companies

Examples/ explanation: (non-exhaustive)

- Advisory services related to capital contribution or funding/ financing arrangement of companies, e.g., initial public offerings (IPOs) or issuance of bonds
- Preparation of agreement related to funding / financing arrangement, e.g., IPOs or issuance of bonds
- Advisory services related to tax/ tax planning, investments in securities and/or other assets

GA II — Managing of client's money, securities or other property

Examples/ explanation: (non-exhaustive)

- Hold or keep client monies/ funds/ assets in separate account (client/escrow account) and use the monies according to the client's instructions in conjunction with any of the specified GAs, e.g., holding of earnest deposit in firm's client account as stakeholder funds pending completion of property acquisition
- Administer and manage client assets in a separate account (client/escrow account), e.g., in relation to lawyer's role as a trustee for the administration of client's assets, tax payment to Inland Revenue Board on behalf of client.
- For lawyers, there could be circumstances of spill-over, in which the funds from litigation process may pass-through the client's account, and hence form part of the Gazetted Activities.

GA III — Managing of accounts including savings and securities accounts

Examples: (non-exhaustive)

- Managing of client's accounts including bank accounts or securities accounts, e.g., acting as authorised signatory on behalf of client to facilitate funds transfer/salary payment from client's bank account to third party/employees, power of attorney over accounts
- Make investments on behalf of clients in securities and/or other assets
- Book-keeping and the preparation of annual and periodic accounts

GA V — Creating, operating or managing of legal entities or arrangements and buying and selling of business entities

Examples: (non-exhaustive)

- Formation or setting up of companies/ entities, including the related advisory services
- Formation or setting up of trust arrangement, including the related advisory services and preparation of trust deed
- Provision of shell or shelf companies, including the related advisory services
- Company secretarial or administrative services for new or existing companies/ entities
- Provision of nominee director/ shareholder services
- Takeover, mergers and acquisition arrangement, including the related advisory services and preparation of Share Sale Agreement
- Insolvency/ receiver-managers/ bankruptcy, including the related advisory services

GAZETTED ACTIVITIES

The following Gazetted Activities are applicable to company secretaries (external) as stipulated under paragraph 3.3 of the Policy Document. Please note that examples cited below are **non-exhaustive**.

COMPANY SECRETARIES

GA I

Act as a formation agent of legal entities

Examples: (non-exhaustive)

- Register or incorporate new companies with Companies Commission of Malaysia (CCM) or other registrar, where relevant

GA II

Act as (or arrange for another person to act as) a director or secretary of a company, a partner of a partnership, or a similar position in relation to other legal entities

Examples: (non-exhaustive)

- Company secretarial services, including acting as director and the related advisory services
- Maintain statutory registers such as register of directors, register of members
- Administration of company related matters, e.g. file updates with CCM on changes of company name or address, issue of shares, changes in directors, shareholders, filing annual returns, making amendments to company constitution, drafting resolutions, organizing the company's board meetings and annual general meeting and prepare agendas and minutes, etc.

GA III

Provide a registered office, business address or accommodation, correspondence or administrative address for a company, a partnership, or any other legal entities or arrangement

Examples: (non-exhaustive)

- Provide or maintain a registered address for companies

GA IV

Act as (or arrange for another person to act as) a trustee of an express trust

Examples/ explanation: (non-exhaustive)

- Provide trustee services, including advisory, administration and management of trust

GA V

Act as (or arrange for another person to act as) a nominee shareholder for another person

Examples: (non-exhaustive)

- Arrange for person B to act as nominee shareholder for company JKW Sdn. Bhd. on behalf of person C, who is the actual owner of JKW Sdn. Bhd.

FAQS ON SUBMISSION REQUIREMENTS

SUBMISSION OF DCR

1. **Is submission of the DCR mandatory?**
   Yes. Submission of the DCR is compulsory and is an enforceable requirement on the specified RI sectors.

   Depending on your firm's situation, your firm should choose to **either** submit Declaration Form or submit DCR Form, not both.

2. **My firm has ceased operation. Am I required to submit DCR Form?**
   You are not required to submit DCR Form. However, you need to submit Declaration Form if your business or company still legally exists.

   In the case that your firm has **no** legal existence (i.e. struck off, dissolved or terminated registration of business), then your firm is exempted from DCR 2026. You do not have to submit Declaration Form or DCR Form.

3. **My firm is in the midst of winding up in 2025. Which form should I submit?**
   Declaration Form.

4. **My firm has no new client for 2024 and 2025. Which form should I submit?**
   Declaration Form.

5. **My firm is newly incorporated in 2025 and has zero client. Which form should I submit?**
   Declaration Form. If your firm is newly incorporated in 2025, please proceed in submitting Declaration Form too.

6. **My firm has been selected for on-site examination by BNM in 2025. Which form should I submit?**
   You do not have to submit DCR 2026. Your firm has been exempted from DCR 2026 exercise.

   For any firms that has been selected for any BNM on-site examination or off-premise examination in 2025 and 2026, please be informed that your firm is exempted from DCR 2026 exercise. Please email dcr@bnm.gov.my for any queries.

7. **My firm has been selected for Independent Audit Review (IAR) by BNM in 2025. Do I have to submit DCR?**
   Yes. Please refer to the self-assessment provided in page 6 to guide you in choosing the correct DCR submission for your firm.

8. **My firm has been selected as part of on-site examination by BNM's authorised audit firms. Do I have to submit DCR?**
   No. If these Audit Firms has contacted/conducted review on your firm on BNM's behalf, you are exempted from DCR 2026 exercise.

9. **Does my firm need to submit one DCR for each of my clients?**
The DCR is filled and submitted based on your firm's business (as a "reporting institution" under the AMLA) and not your clients'. Each firm who is a RI needs to submit one DCR.

10. **Does my firm need to ensure all my clients who are also RIs to submit DCR?**
No. The obligation to ensure that the DCR is submitted is on the RI and its own Compliance Officer.

11. **If a RI qualifies as small-sized, is the RI exempted from the submission of the DCR?**
No, small-sized RIs are still subjected to the DCR submission.

The simplification or exemption are only for selective AML/CFT/CPF requirements. This includes simplification on the conduct of employee screening and training and exemption of AML/CFT/CPF independent audit functions. Please refer to paragraph 11.1.1 of the Policy Document for more information on the exemptions and simplifications applicable to small-sized RIs.

12. **My firm only submitted Declaration Form back for DCR 2024. Can I submit Declaration Form again for DCR 2026?**
Please refer to the self-assessment provided in page 6 to guide you in choosing the correct DCR submission for your firm.

13. **What are the consequences for failure to submit the DCR?**
Failure to submit the DCR 2026 constitutes non-compliance with the AMLA, the FSA and the IFSA, as the case may be. The Bank may pursue appropriate actions, including enforcement actions such as imposition of monetary penalty, in respect of such non-compliance, pursuant to the applicable laws.

14. **What is internal company secretary, lawyer (i.e., legal officer), or accountant?**
An internal company secretary/lawyer/accountant refers to someone who is hired by an organisation to perform specified roles for the organisation. They are considered as an employee to the organisation.

GROUP OF COMPANIES / MULTIPLE PRACTISING CERTIFICATES

Given the different nature of business operations and customer profiles for each business activity, the DCR needs to be submitted separately for each company or practice areas. For instance:

Scenario	Submission Required
I am a Compliance Officer for a group of companies undertaking Gazetted Activities (GA) of company secretarial and accounting services in separate entities (e.g. Firm A for company secretarial service, Firm B for accounting service). How many DCRs should I submit?	One DCR for each business entity.
[For DPMS] My group of companies have several entities operating in the same chain of business (e.g. one manufacturer, one wholesaler firm and one retailer firm). How many DCRs should I submit?	One DCR for each firm.
My firm is part of HQ with multiple branch offices. How should DCR be submitted?	For firms with multiple branch offices, submission is aggregated and by the head office only. However, if the branch office is operating **independently** from the head office and has its own compliance officer, then the branch office should respond to the DCR separately.
My firm provides both GA and non-GA services (e.g., conveyancing and litigation services by the same legal firm). What should my firm do?	For firms providing both GA and non-GA services, your firm is required to submit **one DCR Form** only. Your firm is not required to submit a different Declaration Form for non-provision of GA. For firms providing non-GA only, your firm needs to submit Declaration Form.

GROUP OF COMPANIES / MULTIPLE PRACTISING CERTIFICATES

Scenario	Submission Required
My firm provides services under different sectors, e.g., accounting and company secretarial services or legal and company secretarial services. How many DCR should I submit, and which sector should I choose?	If the provision of services are under 1 firm, you may submit 1 DCR under the firm's core service. For example, 1. Accounting services is the main services provided, please submit DCR under the accounting sector. Information related to company secretarial services can be included as GA V in Part B. The same applies to legal sector. 2. Company secretarial services is the main services provided, please submit DCR under the company secretarial sector. Information related to accounting or legal services can be included as "other services" in Part B.
If a firm has two COs representing different GA undertaken by the firm, should each of the CO submit his/her own DCR or both COs should submit only 1 DCR for the firm?	If the different GA fall under a single sector (e.g. both COs are lawyers carrying out GA of legal sector), only 1 DCR should be submitted by the firm.
In what instances, myself as the CO has to submit separate DCRs?	A CO is required to submit DCR respectively for: • A group of companies or multiple practising certificates holders doing different activities under AMLA (e.g. group of companies undertaking accounting and company secretarial business) • Firms with same brand name but operating independently (e.g. law firms that have branch offices with the name of 'ABC & Partners' but each operating independently)

COMPLIANCE OFFICER (CO)

15. **Does my firm need to appoint a CO prior to submitting the DCR Form?**
Yes, RIs need to appoint a CO before attempting to respond to the DCR.
For new appointment of CO or change of CO, please notify BNM through this link: https://amlcft.bnm.gov.my/co/.

16. **What is a CO number?**
CO number is a unique number assigned to each Compliance Officer for communications with BNM on AML/CFT/CPF matters, including for reporting of STR. You will receive your CO number via the registered email after you have notified BNM on the appointment using the online form.

Please ensure that you have entered the correct sector and email address in the online form. Please note that CO number is unique to the firm. If you are the CO for multiple firms, you will receive a dedicated CO number for each of the firms.

17. **If my firm has appointed CO and has notified the appointment to BNM previously, do we still need to fill up the CO Nomination Notification Form this year?**
No, the CO number previously assigned to the CO of your firm is still valid and can be used to fill in the DCR 2026.

18. **I am a sole proprietor with no employee. Can I appoint myself as the CO?**
Yes.

19. **If my firm is only required to declare our status, do we need to appoint a CO?**
No. Your firm does not have to appoint a CO.

Please refer to this CO infographic for more information

GAZETTED ACTIVITIES (GA)

20. **Do we need to submit the DCR if we provide GA related service but do not hold money in the client's account?**
Yes, DCR submission is required if your firm provides GA, regardless of whether the firm holds or does not hold clients' money in the client accounts.

21. **My firm only commenced GA services in 2026. Do we need to submit DCR?**
As the DCR submission is for transactions or activities for the year of 2024 and 2025, your firm is only required to submit Declaration Form for DCR 2026.

22. **[For Accountants] I am not a member of MIA, but my firm provides accounting services. Does my firm need to submit DCR?**
The DCR submission is on firm basis:
    - If the firm has accountant with practicing certificate from MIA, then to submit DCR 2026.
    - However, if the firm has no accountant with practicing certificate from MIA and is not a RI, then the firm is not required to submit the DCR 2026.

23. **[For Accountants] My firm provides auditing services only. Do we need to submit DCR?**
Accountants who provide audit service which does not fall within any of the 5 GAs are not RIs under the AMLA. As such, your firm is only required to submit Declaration Form.

24. **[For Registered Estate Agents] My firm provides valuation services only. Do we need to submit DCR?**
Only Registered Estate Agents who provide estate agency practice as defined in the Valuers, Appraisers, Estate Agents and Property Managers Act 1981 are RIs under the AMLA.

    Hence, if your firm only carries out valuation services but not any of the estate agency practices, then your firm is not an RI under the AMLA. As such, your firm is only required to submit Declaration Form.

25. **[For Registered Estate Agents] Are the real estate negotiators in my firm required to submit DCR?**
No. The submission is by the **Registered Estate Agents**, at the firm level only.

Please refer to page 7 and 8 for more information on GA

FAQS ON DYNAMIC SUBMISSIONS PORTAL (DSP)

DSP PLATFORM

1. **What is DSP?**
   Dynamic Submissions Portal (DSP) is an official platform for DCR 2026 submission.

2. **What is the difference between current DCR Form vs previous DCR Form?**
   The current DCR Form is a user-friendly system-based questionnaires with enhanced security features.

   It allows users to validate inputs, save drafts and submit forms directly on the platform. There's also a feature where users can post "queries" regarding questions in the DCR Form straight to BNM and Statutory Regulatory Bodies.

3. **How many forms are there in the platform?**
   There will be two types of form (i.e., DCR Declaration Form or DCR Form).

   Please refer to the self-assessment provided in page 6 to guide you in choosing the correct DCR submission for your firm.

ACCESS AND ACCOUNT CREATION

4. **How can I access DSP platform?**
   If your firm only need to submit Declaration Form, you can proceed to open the DSP platform (https://dsp.bnm.gov.my) and click self-register.

   If your firm needs to submit the full DCR Form, there are two scenarios:

   (i) Your firm has nominated CO with BNM, please check your mailbox for an email titled "User Account Created" in your registered email. Please check the spam or junk mail and use the information provided in that email for sign in purposes.

   (ii) Your firm has not nominate CO with BNM, please nominate your CO via this link here and wait for "User Account Created" for access to DSP Portal.

5. **I have nominated my CO but I have not received the "User Account Created email"?**
   It could be because your firm has not notified BNM on the appointment of your firm's CO. Please refer to CO FAQ on page 13 of this information kit for further info.

   However, if your firm has already notified BNM on your CO but has yet to receive the "User Account Created", please email dcr@bnm.gov.my.

6. **I am the CO for many firms, do I need to create new accounts for each DCR submission, respectively?**
If you nominate your CO using the same email, BNM admin will create one account for you that allows access to all your firms. You may submit multiple DCR for all the firms by selecting the correct firm using the **"Reporting On Behalf"** section.

7. **If I already have an account for DCR 2020/2021/2022/2024, do I still need to log in and activate my account?**
Yes. The DSP is a new submission portal, so you are required to activate your account again.

Please log in using your registered Compliance Officer (CO) email and the temporary password provided in the email titled "User Account Created."

LOGIN TO DSP

8. **What do I need to have prior to log in on DSP platform?**
You are recommended to be ready with a device (Computer/Ipad) to fill up DCR and a phone. The chosen device (Computer/Ipad) will be used to fill up the DCR questions while your phone is required for authentication purposes.

Addditionally, you are required to download any universal authenticator application e.g. Google Authenticator, Microsoft Authenticator, Authenticator App or others.

9. **How do I log in?**
Please refer to this **User Guide** on how to login DSP platform.

For password, please ensure password to be at least 12 characters long and contain a mix of uppercase and lowercase letters, numbers and special characters like !@#$%^&*-.

10. **I forgot my password. How can I sign in to my account?**
Click "forgot password" in the DSP sign in page. An email will be sent to the registered email. A temporary new password will be provided in the email.

Follow instruction provided and sign in again.

11. **Is downloading Multi-Factor Authenticator (MFA) application mandatory for all users?**
Yes. MFA is required for every login purposes. For Samsung and Apple users, please download Google Authenticator. For Huawei, Honor, Xiaomi, OPPO, Vivo, please download Microsoft Authenticator. Please refer to this **User Guide** or this **Video Guide**.

12. **How do I use the Microsoft/Google Authenticator App?**
Please refer to this **User Guide** or this **Video Guide**.

13. **What is this 2FA OTP in the sign in page?**
It is referring to the six numbers provided in the Microsoft/Google Authenticator App.

14. **There's a notification saying my account is locked. What should I do next?**
The notification will be prompted after 3 unsuccesful attempts of log in. Please email dcr@bnm.gov.my for assistance.

15. **I could not see any 2FA OTP numbers in my Microsoft/Google Authenticator App. My phone is no longer linked to my DSP account. What should I do?**
This issue occurs because your existing 2FA setup is no longer accessible.

Please send an email to dcr@bnm.gov.my to request a reset of your 2FA settings. In your email, kindly provide your login details (e.g. registered email and username) for verification purposes.

Once the reset is completed, you will be able to set up your 2FA again on your new device and scan new QR code.

16. **Upon login, I noticed some of the DCR question are in grey colour/blocked. I am unable to click or expand the questions. What should I do?**
Those questions are not applicable to your firm. Please proceed to fill up the questions that are applicable to your firm and submit DCR.

OTHER FEATURES OF DSP

17. **Where can I post my "queries"?**
You can post any queries relating to the DCR questionnaires by using the "Discussion" section at the bottom page. Please scroll down to find it.

18. **Is it possible for us to save the Declaration Form and DCR form as draft in the DSP?**
Yes. DSP allows users to save the DCR forms as draft manually. Please ensure that you have click "Save Draft" at the bottom of DCR forms or click "Enter" keypad to save the answers on your current page.

19. **Can we print our drafts of the submitted declaration form or submitted DCR form in DSP?**
Yes, although we do not have a button feature, but user may do so via shortcut:
- Windows: Ctrl + P
- Mac: Command (⌘) + P

20. **Can we submit the DCR in excel/ PDF format or via email?**
No. Submission for DCR 2026 can only be done through the Dynamic Submissions Portal (DSP).

REPORTING CHECKLIST

Before starting the DCR, it is recommended that the reporting institution review and compile the following information or document beforehand to assist in responding to the DCR

PART A: Information on Reporting Institution

1. RI information (name, type/nature of business, registration/license number) ☐
2. RI contact information (email, phone number, address) ☐
3. Compliance Officer (CO) information ☐
   - CO name and number
4. Local and foreign branch information ☐
5. RI size:
   - Number of all employees (for DPMS) ☐
   - Number of practising lawyers, accountants, company secretaries or real estate agent. ☐
   - Number of practising lawyers, accountants or company secretaries carrying out Gazetted Activities ☐
   - Number of real estate negotiators (for REAs) ☐
6. Membership of association(s) (if any) ☐

PART B: Business Information and Structure

1. Transaction information for GA activities (where applicable), including total and breakdown (%) by type of product/services, for 2024 and 2025
   - Revenue / Value of transactions (RM) ☐
   - Number of transactions ☐
   - Value of cash transactions (RM) ☐
2. Payment method by clients ☐
3. Delivery channel (face-to-face and non-face-to-face) ☐

PART C: Institutional Risk Assessment

1. Conduct of ML/TL/PF risk assessments by RI
   - Process or guidance available (e.g. manual or standard operating procedure [SOP]) ☐
   - Frequency of review ☐
   - Risk ratings assigned to products, services, customers, etc. (if any) ☐
   - Risk drivers / risk issues identified (if any) ☐

REPORTING CHECKLIST

PART D: Mandatory AML/CFT/CPF Requirement

1. General Client Information
   - Total number of clients ☐
   - Breakdown of client by types (e.g. individual, legal person, legal arrangement, and politically exposed person, clients in any alert lists, sanctioned/ specified person/ entity, clients with investigation orders issued) ☐
   - Breakdown of client by nationality ☐

2. RI AML/CFT/CPF standard operating procedures (SOP) or implementation manual, specifying the processes, procedures or policy for/ on:
   - Customer Due Diligence or Know Your Customer ☐
   - Record keeping ☐
   - Screening of clients against sanctioned persons/ entities lists ☐
   - Risk profiling / risk rating for clients ☐
   - Enhanced Due Diligence for higher risk customers (if any) ☐
   - Ongoing Due Diligence (for repeat clients) ☐
   - Reporting suspicious transaction (STR) and other STR related information (i.e. number of STR submitted or internally generated STR) ☐
   - Storing clients' information and transactions records (electronic or manual) ☐

PART E: AML/CFT/CPF Programme

1. RI AML/CFT/CPF Compliance Programme (applicable to large-sized firms) in relation to:
   - AML/CFT/CPF Policy & Procedures for implementation of compliance programme ☐
   - Employee training on AML/CFT/CPF measures ☐
   - Screening of employee ☐
   - Independent AML/CFT/CPF audit (where relevant) ☐

DCR REPORTING GUIDE

PART A: Information on Reporting Institution

Information in this part is based on current business information, unless stated otherwise.

Questions are applicable to **ALL** sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
A1 – A5	• Type of Business • Name of Firm • Firm Identification • Email of Firm • Address of Firm	Complete the RI's (firm) full name and contact details based on current details. For question A3 in relation to firm identification, fill in **business or company registration number (BRIC) issued by Companies Commission of Malaysia (CCM) or firm registration number** issued by the authorities or your respective licensing authority or self-regulatory body. Please take note that the email address provided in question A4 will receive the DCR report card. Do check your spam or junk mail folder if it does not arrive in your inbox.
A6	Details of Compliance Officer.	Please fill in your firm's CO name and number that has been provided to you. Appointment of CO is compulsory pursuant to section 19(4) of the AMLA and paragraph 11.5.13 of the Policy Document stipulates the requirement to notify BNM of the appointment. The roles and responsibilities of CO can be found here.

NO.	DCR QUESTION	GUIDANCE
A7 - A7B	Does your firm have any local branch(es) within Malaysia?	If 'Yes,' please provide the postcodes for the locations of the local branch(es). For **lawyers**, please confirm whether you will be submitting the DCR 2026 on behalf of your branches. • If 'Yes', please provide the number and location of your branches by postcodes. • If 'No', please proceed to question A8.
A8 - A9	Are you part of a DNFBP group or other DNFBP structure as defined under paragraph 6.2 of the PD?	For question A8, you have to identify whether your firm is classified as a part of DNFBP group or other DFNBP structures. **DNFBP group** refers to a group that consists of a parent company incorporated in Malaysia or any other type of legal person exercising control and coordinating functions over the rest of the group, together with branches and/or subsidiaries that are subject to AML/CFT/CPF policies and procedures at the group level. **Other DNFBP structures** refers to DNFBP structures that do not operate like financial groups but share common ownership, management or compliance control as defined in the **paragraph 6.2** of the Policy Document. If 'Yes', please proceed to question A9 on the common AML/CFT/CPF policies and procedures implemented for the group or other DNFBP structure. Please refer to **paragraph 13.1.2** of the Policy Document. If 'No', please proceed to question A10.

NO.	DCR QUESTION	GUIDANCE
A10 - A10A	Does your firm have any formal international affiliation/ network/ association?	International affiliation/network/association refers to formal arrangements with international firms to acquire a wider client reach. For example, collaboration between international law offices. This arrangement does not necessarily have to bind affiliated firms to refer cases to each other. This, however, does not constitute a branch and head office relationship. If 'Yes', please indicate the number of such arrangements that your firm has in question A10A. If 'No', please proceed to question A11.
A11 - A11A	Does your firm have any international branch(es) and subsidiari(es) that carry on any activities listed in the First Schedule of AMLA?	Any entities that carry on any activities listed in the First Schedule of AMLA is included in the 'Reporting Institutions (RI)'. Please refer to paragraph 3 of the Policy Document, to better understand if your firm is a reporting institution. If 'Yes', please select all the relevant location of the branches and subsidiaries from the list in question A11A. You can select more than one answer. If 'No', please proceed to question A12.
A12	Total number of employees in your firm.	Please fill in the total number of the following, **regardless of whether they provide Gazetted Activities or not**. Where applicable, • For **accountant**, this refers to number of practising accountants who is MIA member. • For **registered estate agent**, this refers to number of registered members. • For **lawyer and company secretary,** this refers to number of employees with practicing certificate.

NO.	DCR QUESTION	GUIDANCE
A12A	Number of lawyers in your firm. **LAWYER**	Please fill in the number of practising lawyers who provides GA services. Please refer to **paragraph 3.3** of the Policy Document or page 7 and 8 of this information kit for reference and non-exhaustive examples of GAs. The total number should be as of **31 December 2025**.
A13	Number of (whichever is applicable) that **provides Gazetted Activities (GA)** • Practising accountant who are MIA members in your firm • Registered company secretary in your firm **ACCOUNTANT** **COMPANY SECRETARY**	Please fill in the number of practising accountant/ company secretaries who provides GA services, attached to your firm. Please refer to **paragraph 3.3** of the Policy Document or page 7 and 8 of this information kit for reference and non-exhaustive examples of GAs. The total number should be as of **31 December 2025**.
A13 - A13A	Total number of REA in your firm and total number of REN attached to your firm for the year 2025. **REA**	For question A13, please fill in the number of registered estate agents (REA) attached to your firm. For question A14, please fill in the number of real estate negotiators (REN) attached to your firm. The total number should be as of **31 December 2025**.

NO.	DCR QUESTION	GUIDANCE
A13 - A14A	**DPMS** What is your firm's nature of business, business focus and what is the percentage (%) of business from B2B and B2C?	Choose your firm's nature and focus of business from the options provided. For question A13, please select all types of business that your firm is involved in. For question A14, if your firm deals with both B2B (business-to-business) and B2C (business-to-consumer), please state the % of your business contribution from these dealing. **Note!** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. **Example:** XYZ Jewellery mainly manufactures jewelleries for retail market. Occasionally or in some instances (around 10% of the sales), the firm also sells some of the jewelleries to consumer or referred individual clients. In this case: • For question A14, you should select both manufacturer and jewellery retailer • For question A14A, you should input 90 for B2B and 10 for B2C.

NO.	DCR QUESTION	GUIDANCE
A13 - A13A	Is your firm a member of any trust company industry association? **TRUST COMPANIES**	If your firm is a member of any association within your sector, please select from the options provided. Multiple selection is allowed. If you select 'Others,' please specify the name of the association(s) in the column provided.
A14 - A14A	Is your firm a member of real estate industry associations? **REA**	
A15 - A15A	Is your firm a member of goldsmith/jewellery industry association? **DPMS**	

PART B: Business Information and Structure

Information in this part is based on the entire business/operations of your firm in 2024/2025 in particular:

- Revenue/value of transactions (RM)
- Number of transactions
- Payment method by clients
- Value of cash transactions (RM)
- Information on whether firm assist overseas transaction/foreign clients
- Non-face-to-face clients

NO.	DCR QUESTION	GUIDANCE
B1	What is the **total revenue** of your firm? ACCOUNTANT COMPANY SECRETARY REA DPMS FACTORING LEASING MONEYLENDERS TRUST COMPANIES	Please provide the revenue received for ALL activities (including non-GA activities, for applicable sectors i.e., Lawyer, Accountant, Company Secretary) for the **year 2024** and **2025, respectively** based on the calendar year 1 January to 31 December of the specified year. **Example:** Firm ABC Sdn. Bhd. recorded revenue of RM888,888.88 in year 2024 and RM1,111,111.11 in 2025. Thus, question B1 should be filled in as follows: • 2024: 888,888 • 2025: 1,111,111 **Note:** **Moneylenders** should only declare revenue and transactions derived from moneylending activities. Revenue from hire purchase financing or leasing-related activities should be excluded from the reporting.
B1	What is the **total revenue** of your firm? GAMING	Total revenue refers to **total value of tickets sold.** Please provide the total revenue for 2024 and 2025, respectively.

NO.	DCR QUESTION	GUIDANCE
B1	What is the **total value of transactions** of your firm? **LAWYER**	Please provide the total value of transactions of your firm for the **year 2024** and **year 2025, respectively** based on the calendar year 1 January to 31 December of the specified year above. *"Value of transaction" means the monetary value of the client's underlying transaction, activity, matter or arrangement handled by the law firm in year of review (i.e., 2024 or 2025) for Gazetted Activities. This may include, where applicable, the sale or purchase price, financing amount, amount of client money or property managed, contribution amount, capital value, consideration, or value of the relevant business entity, legal entity or legal arrangement. It excludes the law firm's legal fees, stamp duty, registration fees, reimbursements, disbursements, and other charges which are not part of the underlying transaction value.* **Example:** Ari and Partners total value of transactions totalled to RM1,500,000 in year 2024 and RM4,000,000 in 2025. Thus, question B1 should be filled in as follows: • 2024: 1,500,000 • 2025: 4,000,000
B1	Does your firm provides ar-rahnu service? **PAWNBROKERS**	Please select Yes/No.

NO.	DCR QUESTION	GUIDANCE
B1A	What is the **breakdown (%) of revenue** (for each of the products/services) that your firm offer in 2025? **ACCOUNTANT** **COMPANY SECRETARY** **REA** **DPMS** **LEASING**	Please provide the breakdown of the total revenue for the **year 2025,** of each services in percentage (%). **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no revenue for the particular product or service.
B1A	What is the **breakdown (%) of value of transactions** for each of the services that your firm offers for 2025? **LAWYER**	Please provide the breakdown of value of transactions for each of the services for the **year 2025,** of each services in percentage (%). **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular product or service.

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>B1A</td><td>What is the breakdown (%) of revenue - cont'd

DPMS</td><td>Example:
Kedai Emas Madani revenue from jewellery and gold bar amounted to 29.5% 70.2% of the total revenue, respectively.

Thus, question B1A should be filled in as follows:
<table><tr><td>Prescious metal bar for B2B purposes (gold bar, gold coin, gold nugget)</td><td>30</td></tr><tr><td>Jewellery</td><td>70</td></tr><tr><td>Luxury watch containing precious metal and/or precious stones</td><td>0</td></tr><tr><td>Scrap gold</td><td>0</td></tr><tr><td>Worksmanship</td><td>0</td></tr></table></td></tr>
<tr><td></td><td>What is the breakdown (%) of revenue - cont'd

LEASING</td><td>Example:
Company XYZ revenue from financial lease and operational lease amounted to 29.5% 70.2% of the total revenue, respectively.

Thus, question B1A should be filled in as follows:
<table><tr><td>Financial lease</td><td>30</td></tr><tr><td>Operational lease</td><td>70</td></tr></table></td></tr>
<tr><td></td><td>What is the breakdown (%) of revenue - cont'd

GAMING</td><td>Total revenue refers to total tickets sold.

Hence, please indicate 100% under "Tickets Sold" and leave "Total Winnings" blank.

Thus, question B1A should be filled in as follows:
<table><tr><td>Tickets Sold</td><td>100</td></tr><tr><td>Total Winnings</td><td>0</td></tr></table></td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
B1A	What is the **breakdown (%) of revenue** - cont'd **TRUST COMPANIES**	**Example:** ABC Sdn Bhd generated 29.5% and 70.2% of revenue from acting as a director of a company and acting as a trustee of a private trust. Thus, question B1A should be filled in as follows:

Act as (or arrange for another person to act as) a director or secretary of a company, partner of a partnership, or any similar position in relation to other legal entities	30
Act as (or arrange for another person to act as) a nominee shareholders for another person	0
Act as (or arrange for another person to act as) a trustee of an express trust a) Private trust b) Commercial trust	a) 70 b) 0
Other types of activities undertaken/provided, please specify	0

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>B2</td><td>What is total number of transactions of your firm?

LAWYER
ACCOUNTANT
COMPANY SECRETARY
REA
DPMS
FACTORING
LEASING
GAMING
TRUST COMPANIES</td><td>Please provide the total number of transactions for the year 2024 and year 2025, respectively in whole number.

Transactions for each sector refers to the following:
<table><tr><td>Accountant/ Lawyer</td><td>Number of letter of engagements (LoE) issued or still attended to for GA activities only</td></tr><tr><td>Company Secretary</td><td>Number of bills or invoices issued for GA activities only</td></tr><tr><td>DPMS/ Factoriong/ Leasing/ REA/ Trust Companies</td><td>Number of bills or invoices issued</td></tr><tr><td>Gaming</td><td>Total number of winnings</td></tr></table></td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
B2A	What is the **breakdown (%) of number of transactions** for each of the services that your firm offers for 2025? **DPMS** **LEASING** **TRUST COMPANIES** **REA**	Please provide the breakdown of the total transaction for the **year 2025,** of each product and service in percentage (%). **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular product or service.
B2A	What is the **breakdown (%) of number of transactions** for each of the services that your firm offers for 2025? **LAWYER** What is the **breakdown (%) of number of transactions** for each of the services that your firm offers for 2025? **ACCOUNTANT** **COMPANY SECRETARY**	Please provide the breakdown of the total transaction for the **year 2025,** of each product and service in percentage (%). **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular product or service.

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>B2A</td><td>What is the breakdown (%) of number of transactions for each of the services that your firm offers for 2025? (cont'd)</td><td>Example:
Accounting Firm ABC Sdn. Bhd. conducts GA III and GA V activities only with no nominee services provided. GA III and GA V contributed to 29.5% and 70.2% of the total revenue, respectively.

Thus, question B2A should be filled in as follows:
<table><tr><td>GA I</td><td>0</td></tr><tr><td>GA II</td><td>0</td></tr><tr><td>GA III</td><td>30</td></tr><tr><td>GA IV</td><td>0</td></tr><tr><td>GA V (exclude nominee services)</td><td>70</td></tr><tr><td>Non- GA</td><td>0</td></tr></table></td></tr>
<tr><td>B2A</td><td>What is the breakdown (%) of number of transactions?

GAMING</td><td>Number of transaction refers to total winnings.

Hence, please leave "Tickets Sold" blank and indicate 100% under "Total Winnings".
<table><tr><td>Tickets Sold</td><td>0</td></tr><tr><td>Total Winnings</td><td>100</td></tr></table></td></tr>
<tr><td>B2B</td><td>Please provide the breakdown (%) of total winnings.

GAMING</td><td>Please provide the breakdown (%) of total winnings based on the range below.
• RM50,000 - RM100,000
• RM101,000 - RM250,000
• RM251,000 - RM500,000
• RM500,000 and above
Note:
For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%.

Round off to the nearest number, for example:
• for 30.7% of business, please indicate as 31;
• for 99.6% of business, please indicate as 99.
Fill in 0 (zero) if there is no transaction for the particular product or service.</td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
B3	How do clients make payment to your firm for 2025? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY** **REA** **DPMS** **FACTORING** **LEASING** **GAMING** **TRUST COMPANIES**	This refers to the methods of payment used by your clients in **2025**. Please fill in the breakdown in % for each method of payment for GA activities, where applicable, as follows: • Cash (including physical cash notes payment and cash payment deposited into the ATM/CDM/over the counter into RI's account). **For DPMS**, for this option, cash excludes gold. • Telegraphic Transfer (TT)/ Bank Transfer • Debit Card/ Credit Card • E-Wallet/ e-money • Cheque • Gold (only applicable to **DPMS** only) • Others (please specify) **Note:** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no payment is made through the particular method. **Note:** For Gaming sector, clients refers to **winners**.

NO.	DCR QUESTION	GUIDANCE
B4	What is the **total value of all cash transactions** (inward and outward payments) by your firm ? LAWYER ACCOUNTANT COMPANY SECRETARY REA DPMS FACTORING LEASING GAMING TRUST COMPANIES	Please provide the total number of transactions for the **year 2024 and year 2025, respectively.** **Cash transactions cover both inward and outward payments**. Cash transactions include (please see paragraph 6.2 of the Policy Document): • Bank notes and coins to the RI or into a bank account of the RI (via counter or CDM); • Bearer negotiable instruments including traveller's cheques, vouchers and others but exclude bank drafts, cheques, and electronic transfers; and/ or • Precious metals and/or precious stones, including gold trade-ins. Cash transactions for GA activities, where applicable, should exclude operational expenses such as payroll, bills, finance expenses and dividend payment. For purchase of property, money released from bank loans straight into the firm's or vendor's accounts for initial or subsequent payments is **not** considered as cash transaction. Inward cash transactions refer to cash payments received by the firm while outward cash transactions refer to cash payments or cash disbursements made by the firm to customers or other parties. • The reported amount should capture the total value of all inward and outward cash transactions conducted during the reporting period. • Inward and outward cash payments should be aggregated.

NO.	DCR QUESTION	GUIDANCE
		Example: Cash (RM) / 2024 / 2025 Cash received by the firm (inward payment): 500,000 / 150,000 Cash paid by the firm (outward payment): 10,000 / 150,000 Total: 510,000 / 300,000 Thus, question B4 should be filled in as follows: • 2024: 510,000 • 2025: 300,000
B5	Does your firm assist domestic clients for overseas transaction? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY** **REA** **FACTORING** **LEASING** **GAMING** **TRUST COMPANIES**	This question refers to overseas transactions facilitated on behalf of domestic clients. This includes the following: (non-exhaustive) • Assist/ facilitate clients to purchase properties outside of Malaysia (lawyers, REA) • Assist / facilitate clients to incorporate companies outside of Malaysia

Example table (from the B4 guidance above):

Cash (RM)	2024	2025
Cash received by the firm (inward payment)	500,000	150,000
Cash paid by the firm (outward payment)	10,000	150,000
Total	510,000	300,000

NO.	DCR QUESTION	GUIDANCE
B5	Please provide the % of cash transaction that falls within the range listed **DPMS**	Please provide the breakdown in % for **cash transactions** based on the range listed below for year 2025: • RM4,999 and below; • RM5,000 – RM9,999; • RM10,000 – RM24,999; • RM25,000 – RM49,999; • RM50,000 – RM74,999; • RM75,000 – RM99,999; and • RM100,000 and above. **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no cash transaction for that particular range. **Example:** DPMS firm KNJ Jewellery has 100 cash transactions, 80.4% are below RM4,800 and 19.5% are within the range of RM15,000- RM20,000. Based on the above, please fill in question 5 as follows:

RM4,999 and below	80
RM5,000 – RM9,999	0
RM10,000 – RM24,999	20
RM25,000 – RM49,999	0
RM50,000 – RM74,999	0
RM75,000 – RM99,999	0
RM100,000 and above	0

NO.	DCR QUESTION	GUIDANCE
B6	Does your firm assist foreign clients (residing or based in overseas) for any services/transactions in Malaysia? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY** **REA** **FACTORING** **LEASING** **GAMING** **TRUST COMPANIES**	This question refers to assisting foreign clients (residing or based in overseas) for any services / transactions in Malaysia, for example: • Assist/ facilitate clients residing overseas for services in Malaysia, but execution of agreement/ transaction is being conducted outside of Malaysia, assisted by RI abroad. • Act as nominees for foreign firms who want to incorporate locally in Malaysia.
B6	Does your firm assist for domestic overseas transaction? **DPMS**	This question refers to overseas transactions facilitated on behalf of domestic clients.

NO.	DCR QUESTION	GUIDANCE
B7	Does your firm have any clients who you do not meet at all throughout the business relationship (i.e., non-face-to-face clients)? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY** **REA** **FACTORING** **LEASING** **GAMING** **TRUST COMPANIES**	Non-face-to-face means that you do not engage physically with the clients at all during on-boarding and throughout the business relationship, such as through mobile apps or online transaction. Examples of non-face-to-face interactions include, (but are not limited to), phone call, video call, mobile applications, or website/ e-commerce platform. Please answer 'Yes' if your firm has non-face-to-face clients. If 'No', please proceed to Part C.
B7	Does your firm assist foreign clients (residing or based in overseas) for any services/transactions in Malaysia? **DPMS**	This question refers to assisting foreign clients (residing or based in overseas) for any services / transactions in Malaysia.

NO.	DCR QUESTION	GUIDANCE
B8	How many clients are engaged through non-face-to-face? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY** **REA** **FACTORING** **LEASING** **GAMING** **TRUST COMPANIES**	Please determine by % the total number of clients engaged through non-face-to-face methods from the dropdown provided. • Below 20% of total clients • Between 20%-50% of total clients • More than 50% of total clients
B8	Does your firm have any clients who you do not meet at all throughout the business relationship (i.e., non-face-to-face clients)? **DPMS**	Non-face-to-face means that you do not engage physically with the clients at all during on-boarding and throughout the business relationship, such as through mobile apps or online transaction. Examples of non-face-to-face interactions include, (but are not limited to), phone call, video call, mobile applications, or website/ e-commerce platform. Please answer 'Yes' if your firm has non-face-to-face clients. If 'No', please proceed to Part C.
B9	How many clients are engaged through non-face-to-face? **DPMS**	Please determine by % the total number of clients engaged through non-face-to-face methods from the dropdown provided. • Below 20% of total clients • Between 20%-50% of total clients • More than 50% of total clients

NO.	DCR QUESTION	GUIDANCE
B2	What is the total **value of loan disbursement** of your firm ? **MONEYLENDERS**	Please state the total amount in **whole number** for 2024 and 2025, respectively. **Example:** Firm ABC Sdn. Bhd. total loan disbursed amounted to RM888,888.88 in year 2024 and RM1,111,111.11 in 2025. Thus, question B2 and B3 should be filled in as follows: • 2024: 888,888 • 2025: 1,111,111
B3	What is the **breakdown of value of loan disbursement** for each of the services that your firm offers for 2025? **MONEYLENDERS**	Please provide the breakdown of value of loan disbursement for the **year 2025,** of each services: • Secured loan to individual client • Secured loan to corporate client • Unsecured loan to individual client • Unsecured loan to corporate client Fill in 0 (zero) if there is no loan disbursement for the particular loan type.

NO.	DCR QUESTION	GUIDANCE
B4	What is the **total value of loan repayment** of your firm ? **MONEYLENDERS**	Please state the total amount in **whole number** for 2024 and 2025, respectively. **Example:** Firm ABC Sdn. Bhd. total loan repaid amounted to RM888,888.88 in year 2024 and RM1,111,111.11 in 2025. Thus, question B2 and B3 should be filled in as follows: • 2024: 888,888 • 2025: 1,111,111
B4A	What is the **breakdown of value of loan repayment** for each of the services that your firm offers for 2025? **MONEYLENDERS**	Please provide the breakdown of the value of loan repayment for the **year 2025,** of each services in percentage (%) for: • Secured loan to individual client • Secured loan to corporate client • Unsecured loan to individual client • Unsecured loan to corporate client Fill in 0 (zero) if there is no repayment for the particular loan type.
B5	What is the **total number of loan disbursement transaction** of your firm? **MONEYLENDERS**	Please state the total amount in **whole number** for 2024 and 2025, respectively.

NO.	DCR QUESTION	GUIDANCE
B5A	What is the **breakdown (%) of number of loan disbursement transaction** for each of the services that your firm offers for 2025? **MONEYLENDERS**	Please provide the breakdown for number of loan disbursement transaction for the **year 2025,** of each services in percentage (%) for: • Secured loan to individual client • Secured loan to corporate client • Unsecured loan to individual client • Unsecured loan to corporate client **Note:** For answers in %, please provide in **whole numbers** i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular loan type.
B6	What is the **total number of loan repayment transaction** of your firm? **MONEYLENDERS**	Please state the total amount in **whole number** for 2024 and 2025, respectively.

NO.	DCR QUESTION	GUIDANCE
B6A	What is the **breakdown (%) of number of loan repayment transaction** for each of the services that your firm offers for 2025? **MONEYLENDERS**	Please provide the breakdown for number of loan repayment transaction for the year 2025, of each services in percentage (%) for: • Secured loan to individual client • Secured loan to corporate client • Unsecured loan to individual client • Unsecured loan to corporate client **Note:** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular loan type.
B7	How do clients make payment to your firm for 2025? (answer in %). **MONEYLENDERS**	This refers to the methods of payment used by your clients in **2025**. Please fill in the breakdown in % for each method of payment for GA activities, where applicable, as follows: • Cash (including physical cash notes payment and cash payment deposited into the ATM/CDM/over the counter into RI's account). • Telegraphic Transfer (TT)/ Bank Transfer • Debit Card/ Credit Card • E-Wallet/ e-money • Cheque • Gold (only applicable to **DPMS** only) • Others (please specify)

NO.	DCR QUESTION	GUIDANCE
B7	How do clients make payment to your firm for 2025? (answer in %) - cont-s **MONEYLENDERS**	**Note:** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no transaction for the particular loan type.
B8	What is the **total value of all cash transactions** (inward and outward payments) by your firm ? **MONEYLENDERS**	Please provide the total number of transactions for the year 2024 and year 2025, respectively in whole number. Cash transactions cover both inward and outward payments. Cash transactions include (please see paragraph 6.2 of the Policy Document): • Bank notes and coins to the RI or into a bank account of the RI (via counter or CDM); • Bearer negotiable instruments including traveller's cheques, vouchers and others but exclude bank drafts, cheques, and electronic transfers; and/ or Inward and outward cash payments should be aggregated. Example: Thus, question B8 should be filled in as follows: • 2024: 510,000 • 2025: 300,000

Cash (RM)	2024	2025
Cash received by the firm (inward payment)	500,000	150,000
Cash paid by the firm (outward payment)	10,000	150,000
Total	510,000	300,000

NO.	DCR QUESTION	GUIDANCE
B9	Does your firm assist for domestic overseas transaction? **MONEYLENDERS**	This question refers to overseas transactions facilitated on behalf of domestic clients.
B10	Does your firm assist foreign clients (residing or based in overseas) for any services/transactions in Malaysia? **MONEYLENDERS**	This question refers to assisting foreign clients (residing or based in overseas) for any services / transactions in Malaysia.
B11	Does your firm have any clients who you do not meet at all throughout the business relationship (i.e., non-face-to-face clients)? **MONEYLENDERS**	Non-face-to-face means that you do not engage physically with the clients at all during on-boarding and throughout the business relationship, such as through mobile apps or online transaction. Examples of non-face-to-face interactions include, (but are not limited to), phone call, video call, mobile applications, or website/ e-commerce platform. Please answer 'Yes' if your firm has non-face-to-face clients. If 'No', please proceed to Part C.
B12	How many clients are engaged through non-face-to-face? **MONEYLENDERS**	Please determine by % the total number of clients engaged through non-face-to-face methods from the dropdown provided. • Below 20% of total clients • Between 20%-50% of total clients • More than 50% of total clients

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>B2</td><td>What is the total revenue of your firm?
PAWNBROKERS</td><td rowspan="2">Please state the total amount in whole number for 2024 and 2025, respectively.

Example:
Firm ABC Sdn. Bhd. recorded revenue of RM888,888.88 in year 2024 and RM1,111,111.11 in 2025.

Thus, question B2 and B3 should be filled in as follows:
• 2024: 888,888
• 2025: 1,111,111</td></tr>
<tr><td>B3</td><td>What is the total value of pawn/redemption of your firm?
PAWNBROKERS</td></tr>
<tr><td>B3A</td><td>What is the breakdown of value of pawn/redemption for each of the services that your firm offers for 2025?
PAWNBROKERS</td><td>Please provide the breakdown of the total value of pawn/redemption for each of the services that your firm offers for 2025:
• Pawn
• Redemption
• Ar-rahnu pawn
• Ar-rahnu redemption

Fill in 0 (zero) if there is no provision of the particular product or service.</td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
B4	What is the **total number of pawn/redemption transactions** of your firm? **PAWNBROKERS**	Please state the total amount in **whole number** for all services which commenced **OR** still worked on between 1 January 2024 to 31 December 2025 regardless of whether the said services were completed in **OR** after the said period.
B4A	What is the **breakdown of number of pawn/redemption transactions** for each of the services that your firm offers for 2025? **PAWNBROKERS**	Please provide the breakdown of the total number of pawn/redemption transactions for the year 2025: • Pawn • Redemption • Ar-rahnu pawn • Ar-rahnu redemption Fill in 0 (zero) if there is no provision for the particular product or service.

NO.	DCR QUESTION	GUIDANCE
B5	How do clients make payment to your firm for 2025? (answer in %) **PAWNBROKERS**	This refers to the methods of payment used by your clients in 2025. Please fill in the breakdown in % for each method of payment for GA activities, where applicable, as follows: • Cash (including physical cash notes payment and cash payment deposited into the ATM/CDM/over the counter into RI's account). • Telegraphic Transfer (TT)/ Bank Transfer • Debit Card/ Credit Card • E-Wallet/ e-money • Cheque • Gold (only applicable to DPMS only) • Others (please specify) **Note:** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if there is no payment is made through the particular method.

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>B6</td><td>What is the total value of all cash transactions (inward and outward payments) by your firm ?

PAWNBROKERS</td><td>Please provide the total number of transactions for the year 2024 and year 2025, respectively in whole number.

Cash transactions cover both inward and outward payments. Cash transactions include (please see paragraph 6.2 of the Policy Document):
Bank notes and coins to the RI or into a bank account of the RI (via counter or CDM);
Bearer negotiable instruments including traveller's cheques, vouchers and others but exclude bank drafts, cheques, and electronic transfers; and/ or
Inward and outward cash payments should be aggregated.

Example:<table><tr><th>Cash (RM)</th><th>2024</th><th>2025</th></tr><tr><td>Cash received by the firm (inward payment)</td><td>500,000</td><td>150,000</td></tr><tr><td>Cash paid by the firm (outward payment)</td><td>10,000</td><td>150,000</td></tr><tr><td>Total</td><td>510,000</td><td>300,000</td></tr></table>
Thus, question B6 should be filled in as follows:
2024: 510,000
2025: 300,000</td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
B7	Does your firm assist for domestic overseas transaction? **PAWNBROKERS**	This question refers to overseas transactions facilitated on behalf of domestic clients.
B8	Does your firm assist foreign clients (residing or based in overseas) for any services/transactions in Malaysia? **PAWNBROKERS**	This question refers to assisting foreign clients (residing or based in overseas) for any services / transactions in Malaysia.
B9	Does your firm have any clients who you do not meet at all throughout the business relationship (i.e., non-face-to-face clients)? **PAWNBROKERS**	Non-face-to-face means that you do not engage physically with the clients at all during on-boarding and throughout the business relationship, such as through mobile apps or online transaction. Examples of non-face-to-face interactions include, (but are not limited to), phone call, video call, mobile applications, or website/ e-commerce platform. Please answer 'Yes' if your firm has non-face-to-face clients. If 'No', please proceed to Part C.
B10	How many clients are engaged through non-face-to-face? **PAWNBROKERS**	Please determine by % the total number of clients engaged through non-face-to-face methods from the dropdown provided.

PART C: AML/CFT/CPF Risk Assessment

Information in this part is based on current process, practice, or assessment of the firm, unless otherwise stated.

The ML/TF/PF risk assessment is an exercise to identify, assess and understand the MT/TF/PF risks faced by your firm, by considering the following risk factors:

- customer risk
- product /services risk
- geographical location
- delivery channels

Questions are applicable to **ALL** sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
C1	Has your firm conducted any ML/TF/PF risk assessments on its own business?	If your firm has undertaken any sort of ML/TF/PF risk assessments, please select the appropriate answer from the dropdown menu/ list. If 'Yes, documented' or 'Yes', but not documented' or "No, but my firm understands risk inherent to my sector based on risk assessment results shared by BNM", to proceed to C2. If 'No', to proceed to Part D.
C2	How often does your firm conduct/review the ML/TF/PF risk assessment on your own business?	Please select the relevant frequency of the ML/TF/PF risk assessment conducted by your firm from the selection.
C3	Does your firm incorporate the results of the National Risk Assessment (NRA) report when conducting your firm's risk assessment?	Please select 'Yes' if your firm use NRA as a reference when assessing your risks. Risks that are highlighted in the NRA includes but not limited to, high-risk customers, industries, or countries.

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>C3A - C3C</td><td>From your firms' own
Money Laundering (ML);
Terrorist Financing (TF); and
Proliferation Financing (PF)
risk assessments, what is the risk rating level for each risk factor?</td><td>If your firm conducted ML/TF/PF risk assessments, please select the corresponding ML,TF and PF risk rating level (i.e., Low, Medium, High) for each risk factor.

There are four types of risks to be considered by RIs:

a) Client Risk
Refers to RI's exposure to politically exposed person (PEP) clients, nationality or location of clients, occupation for individual clients, nature of business for corporate clients, etc.
Please refer to Appendix 9 of the <u>Policy Document</u>.
b) Transaction/Delivery Channel Risk
Usage of cash in business/practice, non-face-to-face channels, location of funds, etc.
Please refer to Appendix 9 of the Policy Document.
c) Products and Services Risk
Refers to nature and complexity of the products/ services offered by the firm.
For example, whether products are easily transferable/ not easily traceable/ exchanged/ high value, services allow payment from third-party/ unknown parties, able to conceal beneficial ownership, services that include creation/ setting up of complex legal structures, etc.
Please refer Appendix 9 of <u>Policy Document</u>.
d) Geographical risk
Refers to whether location of business (HQ and/or branches) is at/near country's border, crime hotspots, etc.
If your firm's assessments do not consider any of the above specified risk factors, please choose 'Not Assessed' from the selection.</td></tr>
</table>

PART D: AML/CFT/CPF Programme

Questions in this part are based on your firm's **current** process, practice on client or transactions relating to (i) activities regulated under the AMLA; or (ii) meets the Customer Due Diligence (CDD) threshold specified for DPMS. Responses would determine the understanding and/ or compliance of the RI on the AML/CFT/CPF and TFS requirements.

Questions are applicable to **ALL** sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
D1	What is your firm's total number of client? **FACTORING** **LEASING** **MONEYLENDERS** **PAWNBROKERS** **TRUST COMPANIES** **REA**	Please provide total number of clients **for 2024** and **2025**, respectively.
D1	What is your firm's total number of client? **GAMING**	Total number of clients refers to **total number of winners.** Please provide for 2024 and 2025, respectively.
D1	What is your firm's total number of client for Gazetted Activities (GA)? **LAWYER** **ACCOUNTANT** **COMPANY SECRETARY**	Please provide total number of clients of your firm for **Gazetted Activities** (where applicable) **for 2024** and **2025, respectively.**

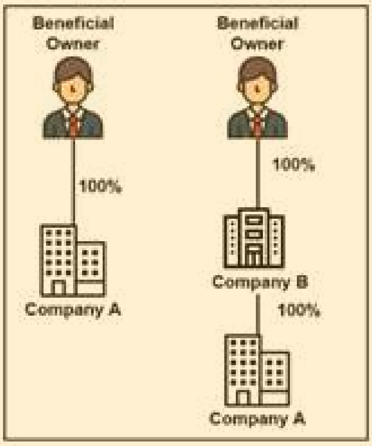
NO.	DCR QUESTION	GUIDANCE
D1 - D1C	What is your firm's total number of clients? **DPMS**	Please provide total number of clients for **2024** and **2025, respectively.** For question D1A, please indicate whether there are clients who transacted in cash for **RM50,000 and above** for year 2024 and 2025. If 'Yes' for D1A, please indicate the total number of clients that transacted in cash for **RM50,000 and above** for year 2024 and 2025, respectively in D1B. If 'No', please indicate if your firm collects information on client's identity in D1C.
D2	Please provide the number of **MALAYSIAN** clients.	Please provide the number of **MALAYSIAN** clients **for 2025 only,** based on the following type: • Individual • Sole proprietors, partnerships, limited liability partnerships, companies • Government-linked companies (GLC)/ state owned corporations (SOC) • Societies, foundations, associations i.e. CLBG and Non-profit organisations (NPO) • Legal arrangements e.g. trusts **Note:** **Companies incorporated in Malaysia with foreign shareholders (or foreign beneficial owners) are considered as MALAYSIAN clients.** **For Lawyer, Accountant, and Company Secretary, please provide number of MALAYSIAN clients for Gazetted Activities only.**

NO.	DCR QUESTION	GUIDANCE
CUSTOMER DUE DILIGENCE (FOR MALAYSIAN CLIENTS)		
D3A	What information does your firm collect from your individual client, or person conducting transaction, or beneficial owner? **Note:** **Companies incorporated in Malaysia with foreign shareholders (or foreign beneficial owners) are considered as MALAYSIAN clients.**	*This question is dependent on whether you have indicated a certain percentage of* ***individual clients*** *in question D1.* CDD is the process of **identifying** and **verifying** (using reliable and independent documentation including electronic data) the identity of your clients, persons conducting the transaction (PCT) as well as beneficial owners (BO). Please refer to the requirement on CDD in paragraph 14 of the Policy Document. For question D3A, please select from the list **ALL** relevant information that your firm obtains/collects to **identify** your individual clients, PCT or BO. • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed.
D3B	What documents does your firm use/obtain to verify/confirm the identity of your individual clients?	For question D3B, please select from the list all type of information, electronic data or documents (if any) that you use to **verify** the identity of your clients, PCT or BO. • You may select more than one answer. • Please specify if you rely on any other documents that are not listed

<table>
<tr><th>NO.</th><th>DCR QUESTION</th><th>GUIDANCE</th></tr>
<tr><td>D4A</td><td>What information does your firm collect from your corporate and business clients (sole proprietorships, partnerships, limited liability partnerships, companies, GLC, NPO, societies, foundation, association)?</td><td rowspan="2">This question is dependent on whether you have indicated a certain percentage of corporate clients in question D1.

For question D4A, please select from the list, ALL relevant information that your firm obtains / collects to identify your corporate clients.
You may select more than one answer.
Please specify if you obtain or collect other information that are not listed
For question D4B, please select from the list, ALL type of information, electronic data or documents (if any) that you use to verify the identity of your corporate clients.
You may select more than one answer.
Please specify if you rely on any other documents that are not listed.</td></tr>
<tr><td>D4B</td><td>What documents does your firm use/obtain to verify/confirm the identity of your corporate and business clients (sole proprietorships, partnerships, limited liability partnerships, companies, GLC, NPO, societies, foundation, association)?</td></tr>
<tr><td>D4C - D4Cii</td><td>For corporate clients, does your firm identify who is the individual (beneficial owner) that directly or indirectly owns or control the business/company?</td><td>This question is dependent on whether you have indicated a certain percentage of corporate clients in question D1.

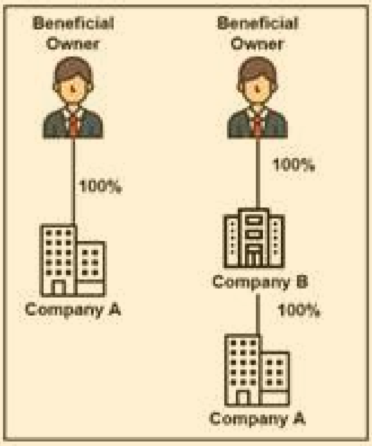
Beneficial owner refers to any natural person(s) who ultimately owns or controls a client and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.</td></tr>
</table>

NO.	DCR QUESTION	GUIDANCE
D4C - D4Cii	For corporate clients, does your firm identify who is the individual (beneficial owner) that directly or indirectly owns or control the business/company? (cont'd)	As provided in paragraph 14.10.6 of the Policy Document, RIs should identify the beneficial owners of legal persons through the steps provided in the Policy Document (an example is provided below). **For example:**  **[Left diagram]** Direct ownership **[Right diagram]** Indirect ownership. If Company A is legally owned by Company B (according to its corporate registration information), the beneficial owners are the natural persons behind the Company B (or behind the ultimate holding company in the chain of ownership). For more information, please refer to the Guidance on Beneficial Ownership which can be accessed here. For question 4C, please select 'Yes' or 'No' if your firm **identify** who is the individual or beneficial owner that directly or indirectly owns or control the business/entity • If 'Yes', please proceed to questions 4C (i) and 4C (ii). • If 'No', please proceed to the next relevant question. For question D4C (i), please select from the list on how your firm check/ obtain information to verify the identity of the beneficial owner of your corporate clients. • You may select more than one answer. For question D4C (ii), please select 'Yes', 'No' or 'Partially', if your firm verify all layers of corporate shareholding of your corporate clients to know who is the ultimate beneficial owner.

NO.	DCR QUESTION	GUIDANCE
D5A - D5B	What information does your firm collect/obtain to identify/verify your legal arrangement client?	*This question is **dependent** on whether you have indicated a certain percentage of legal arrangement clients in question 1.* For question D5A, please select from the list **ALL** relevant information that your firm obtains/ collects to **identify** your legal arrangement clients. • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed For question D5B, please select from the list the type of information, electronic data or documents (if any) that you use to **verify/confirm** the identity of your legal arrangement clients. • You may select more than one answer. • Please specify if you rely on any other documents that are not listed.
CUSTOMER DUE DILIGENCE (NON-MALAYSIAN CLIENTS)		
D6 - D6A	Does your firm have any **NON-MALAYSIAN** clients? **Note:** **Companies incorporated outside of Malaysia and/or operating and/or registered (as foreign company) in Malaysia are considered as NON-MALAYSIAN clients.**	Please select 'Yes' or 'No'. If 'Yes', please provide the number of **NON-MALAYSIAN clients** for Gazetted Activities (GA), for 2025 only, based on the following type: • Individual • Sole proprietors, partnerships, limited liability partnerships, companies • Government-linked companies (GLC)/ state owned corporations (SOC) • Societies, foundations, associations i.e. CLBG and Non-profit organisations (NPO) • Legal arrangements e.g. trusts **Note:** For Lawyer, Accountant, and Company Secretary, please provide number of **NON-MALAYSIAN** clients for Gazetted Activities only.

NO.	DCR QUESTION	GUIDANCE
D7A	What information does your firm collect from your **NON-MALAYSIAN** individual client, or person conducting transaction, or beneficial owner?	*This question is **dependent** on whether you have indicated a certain percentage of **individual clients** in question D1.* CDD is the process of **identifying** and **verifying** (using reliable and independent documentation including electronic data) the identity of your clients, persons conducting the transaction (PCT) as well as beneficial owners (BO). For more information, please refer to the infographic on CDD which can be accessed here. Please also refer to the requirement on CDD in paragraph 14 of the Policy Document. For question D7A, please select from the list **ALL** relevant information that your firm obtains/collects to **identify** your individual clients, PCT or BO. • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed. For question D7B, please select from the list all type of information, electronic data or documents (if any) that you use to **verify** the identity of your clients, PCT or BO. • You may select more than one answer. • Please specify if you rely on any other documents that are not listed
D7B	What documents does your firm use/obtain to verify/confirm the identity of your **NON-MALAYSIAN** individual clients?	

NO.	DCR QUESTION	GUIDANCE
D8A	What information does your firm collect from your foreign corporate and business clients (sole proprietorships, partnerships, limited liability partnerships, companies, GLC, NPO, societies, foundation, association)?	*This question is **dependent** on whether you have indicated a certain percentage of corporate clients in question D1.* For question D8A, please select from the list, **ALL** relevant information that your firm obtains / collects to **identify** your corporate clients. • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed For question D8B, please select from the list, **ALL** type of information, electronic data or documents (if any) that you use to **verify** the identity of your corporate clients. • You may select more than one answer. • Please specify if you rely on any other documents that are not listed.
D8B	What documents does your firm use/obtain to verify/confirm the identity of your foreign corporate and business clients (sole proprietorships, partnerships, limited liability partnerships, companies, GLC, NPO, societies, foundation, association)?	
D8C - D8Cii	For foreign corporate clients, does your firm identify who is the individual (beneficial owner) that directly or indirectly owns or control the business/company?	*This question is **dependent** on whether you have indicated a certain percentage of corporate clients in question D1.* **Beneficial owner** refers to any natural person(s) who **ultimately owns** or **controls** a client and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

NO.	DCR QUESTION	GUIDANCE
D8C - D8Cii	For foreign corporate clients, does your firm identify who is the individual (beneficial owner) that directly or indirectly owns or control the business/company? (cont.)	As provided in paragraph 14.10.6 of the Policy Document, RIs should identify the beneficial owners of legal persons through the steps provided in the Policy Document (an example is provided below). **For example:**  **[Left diagram]** Direct ownership **[Right diagram]** Indirect ownership. If Company A is legally owned by Company B (according to its corporate registration information), the beneficial owners are the natural persons behind the Company B (or behind the ultimate holding company in the chain of ownership). For more information, please refer to the Guidance on Beneficial Ownership which can be accessed here. For question D8C, please select 'Yes' or 'No' if your firm **identify** who is the individual or beneficial owner that directly or indirectly owns or control the business/entity • If 'Yes', please proceed to questions 4C (i) and 4C (ii). • If 'No', please proceed to the next relevant question. For question D8C (i), please select from the list on how your firm check/ obtain information to verify the identity of the beneficial owner of your corporate clients. • You may select more than one answer. For question D8C (ii), please select 'Yes', 'No' or 'Partially', if your firm verify all layers of corporate shareholding of your corporate clients to know who is the ultimate beneficial owner.

NO.	DCR QUESTION	GUIDANCE
D9A - D9B	What information does your firm collect/obtain to identify/verify foreign legal arrangement client?	*This question is dependent on whether you have indicated a certain percentage of legal arrangement clients in question D1.* For question D9A, please select from the list all relevant information that your firm obtains/ collects to **identify** your legal arrangement clients. • You may select more than one answer. • Please specify if you obtain or collect other information that are not listed For question D9B, please select from the list the type of information, electronic data or documents (if any) that you use to **verify/confirm** the identity of your legal arrangement clients. • You may select more than one answer. • Please specify if you rely on any other documents that are not listed.
D10	Has your firm conducted delayed verification?	Delayed verification refers to verification done after offer is made, after transaction begin or after relationship is established. Choose 'Yes' if it is applicable to your firm. If 'No', please proceed to D12.

NO.	DCR QUESTION	GUIDANCE
D11	How long does your firm take to complete the delayed verification?	For D11, please select the relevant timeframe for delayed verification for your firm.
D12	Please state the country(ies) and percentage (%) of your Non-Malaysian clients from each country (Please ensure that the overall total % does not exceed 100).	*This question is dependent on whether you have indicated the firm has Non-Malaysian clients in question D6.* **Note:** For answers in %, please provide in whole numbers i.e. from 0 to 100 only. Please ensure that the % total up to 100%. Round off to the nearest number, for example: • for 0.3% of business, please indicate as 1; • for 30.7% of business, please indicate as 31; • for 99.6% of business, please indicate as 99. Fill in 0 (zero) if the category is not applicable. **Example:** Accounting Firm XYZ Sdn. Bhd. provided services to 50 foreign clients in 2025, with the following breakdown: 12 Indonesian 30 Singaporean 18 United Kingdom Fill up the state and % of your Non-Malaysian clients from each country: Indonesia: 24 Singapore: 60 United Kingdom: 36

NO.	DCR QUESTION	GUIDANCE
SANCTIONS SCREENING		
D13	What are the sanctions lists that your firm uses when conducting screening on your clients?	Maintaining sanctions lists and screening of all new and existing clients against these lists are part of the AML/CFT/CPF requirements. You may refer to the Policy Document for links to the relevant sanctions lists. Please choose the relevant sanctions list that your firm maintains. • You may select more than one answer. • If you do not maintain any of the lists, select 'None of the above' and proceed to question D16.
D14	How does your firm screen your clients against the sanctions lists?	Please choose the most relevant answer based on your firm's practice.
D15	Does your firm put in place relevant process or procedures for the purpose of dealing with confirmed sanctioned client/ potential client who is in the sanctions list?	Please select the relevant process/procedures in place, in the event of any match from the sanctions lists that you maintain, or when dealing with sanctioned individuals or entities. • You may select more than one answer.

NO.	DCR QUESTION	GUIDANCE
CUSTOMER RISK PROFILING		
D16	Does your firm assess the ML/TF/PF risk of your clients?	Risk profiling of clients is conducted during customer on-boarding. Please choose 'Yes' or 'No' on whether your firm conducts customer risk profiling. If 'Yes', please proceed to answer questions D16A - D 16D. If 'No', please proceed to question D18.
D16A	Please provide the number of clients by each categories.	For reference, • Politically Exposed Person (PEP) refers to individuals who are/have been entrusted with prominent public functions or prominent functions by an international organization. Domestic PEP refers to Malaysian PEP. • Foreign PEP refers to Non-Malaysian PEP. • High Net Worth clients is typically a customer whose wealth, assets, or transaction size is significantly above the firm's standard client base and may warrant enhanced due diligence. The determination of a High Net Worth client is left to the respective RI, based on its business model, risk appetite, and customer profile. • Clients who are sanctioned individuals for terrorism financing and proliferation financing (TF/PF) refers to individuals who are listed in MOHA and UNSCR list. • Clients with investigation orders issued by authorities (including but not limited from LHDN, MACC, PDRM) refers to if any of the authorities have issued investigation orders on your clients.
D16B	How does your firm assess the ML/TF/PF risks of your clients?	Formal process refers to standardise process/ procedure that is consistently conducted on all clients. Informal process may refer to judgment/assessment by senior management/ partner or relevant PIC.

NO.	DCR QUESTION	GUIDANCE
D16C	What do you consider when determining whether your client is higher/lower risk?	Please choose the relevant items considered when assessing a client.
D16D	When does your firm review your clients' ML/TF/PF risks?	Please select the most suitable answer.
ENHANCED DUE DILIGENCE		
D17A	Does your firm asks for more information (e.g. source of funds, source of wealth) before accepting higher ML/TF/PF risks clients?	*This question is dependent on whether you have indicated a certain percentage of legal arrangement clients in question D16A.* Source of funds refers to source of a specific asset/money used in the client's transaction with your firm. Source of wealth refers to source of the person's total assets.
D17B	Does your firm obtain approval from senior management/ owner/ partner before accepting higher ML/TF/PF risks clients?	*This question is dependent on whether you have indicated a certain percentage of legal arrangement clients in question D17A.* Please select the answer that is applicable to your firm.
ONGOING DUE DILIGENCE		
D18A	Does your firm monitor and review clients' transactions to see if they are consistent with their profile?	For D17A, select 'Yes' if your firm monitor and review clients' transactions, or update clients' information throughout the business relationship. For D17B, select 'Yes' if your firm updates CDD documents, data or information of clients.
D18B	Does your firm update clients' information?	

NO.	DCR QUESTION	GUIDANCE
RECORD KEEPING		
D19A	Does your firm keep copies or records of the identification documents of your firms' clients and beneficial owners?	Record keeping refers to copies of documents used during the identification and verification process of clients being kept by your firm. These include receipts, agreements and invoices. For question D19A - D19C, please select 'Yes', 'No' or 'Partially', based on your firm's practice.
D19B	Does your firm keep copies of all transaction records of clients?	
D19C	How long does your firm keep your clients' records?	
MANAGEMENT INFORMATION SYSTEM		
D20A	How does your firm maintain and centralise clients' information (also known as management information system, MIS)?	MIS refers to any system used by your firm to store clients' information and transactions records. Please choose the most relevant answer from the selection in question D20A. MIS does not necessarily have to be digitalised or computerised. MIS can be in a manual form as long as MIS adopted by the firm is capable of aggregating client's transactions from multiple accounts/files and/or across all branches. And more importantly, can **Examples of an electronic MIS**: • In-house/ off-the-shelves accounting/ centralised data management system. • Excel or any database software. **Example of a manual MIS**: • Hardcopy files and centralised filing system.

NO.	DCR QUESTION	GUIDANCE
D20B	Is the way that your firm maintain and centralise clients' information able to do the following?	Please select the answer that is applicable to your firm.
SUSPICIOUS TRANSACTION REPORTS (STR)		
D21A - D21B	Does your firm have any triggers/criterias (also called as red flags) to identify suspicious transactions?	To detect suspicious transactions, does your firm, either documented or not documented, have any scenarios or criteria (red flags) to identify whether a client or a transaction may be suspicious? Suspicious transactions should be reported to BNM whenever the RI suspects that the transaction (including attempted or proposed), regardless of the amount: • appears unusual; • has no clear economic purpose; • appears illegal; • involves proceeds from an unlawful activity or instrumentalities of an offence; or • indicates that the client is involved in ML/TF. Please select the relevant answers for your firm in question D21. Do note that you can also refer and obtain the common or sector-specific red flags in the Policy Document, as a guidance in identifying your firm's red flags. Please see Appendix 14 of the Policy Document. If 'Yes' for question D21A, proceed to question D21B on whether the identified red flags are provided to all the staff/employees of the firm.

NO.	DCR QUESTION	GUIDANCE
D21C	Does your firm have any procedures/workflow for the submission of suspicious transaction report (STR)?	The procedures refer to: • Procedures to channel internal STR from employee to the CO; • Duration of time for the CO to review the internal STR; and • Duration of time for the CO to submit an STR to BNM, upon confirmation of suspicion. Please select the relevant answer for your firm for question D21C.
D21D	Who decides whether to submit STR to BNM for your firm?	Please indicate who decides to submit STR to BNM for your firm, either through mail, email or FINS (Financial Intelligence System) platform.
COMPLIANCE OFFICER (CO) FUNCTION		
D22	Has your firm's Compliance Officer attended any AML/CFT/CPF training?	Please select the answer that is applicable to your firm. **Note:** Example of AML/CFT/CPF training are as per below, but not limited to trainings provided by: • BNM; • licensing authority (e.g. Companies Commission of Malaysia); • self-regulatory bodies (e.g. Bar Council Malaysia or Malaysian Institute of Accountants);or • industry associations (e.g. MAICSA, FGJAM (Federation of Goldsmith and Jewellers Association of Malaysia) etc).

NO.	DCR QUESTION	GUIDANCE

PART E: AML/CFT/CPF COMPLIANCE PROGRAMME

GENERAL INFORMATION

I **AML/CFT/CPF Compliance Programme consists of several requirements as follows:**

Policies, Procedures and Controls
(paragraph 11.2 of the Policy Document)

Employee Training & Awareness Programme
(paragraph 11.8 of the Policy Document)

Employee Screening Procedures
(paragraph 11.7 of the Policy Document)

Independent Audit Function
(paragraph 11.9 of the Policy Document)

II **Please refer to the Policy Document for full details on AML/CFT/CPF compliance programme**

- Select what is relevant to the practice of your firm.
- Small-sized RIs are subject to the application of simplification or exemption of Compliance Programme requirements, pursuant to paragraph 11.1 of the Policy Document.
  - Please refer to Appendix 2 of PD for definition of small-sized RIs for DNFBPs sectors.

III **Proceed in answering the following questions, where applicable**

Small-sized RI
Question E1

Large-sized RI
Question E2 - E5A

Questions are applicable to **ALL** sectors unless otherwise specified

NO.	DCR QUESTION	GUIDANCE
AML/CFT/CPF COMPLIANCE PROGRAMME		
E1	Please select the number of practicing certificate holders in your firm. **ACCOUNTANT** **COMPANY SECRETARY** **LAWYER**	Please select the answer that is applicable to your firm.
	Please select the applicable category for your firm. **DPMS**	Please select the answer that is applicable to your firm.
	Please select the annual sales turonver and number of employees for your firm in 2025. **FACTORING** **LEASING** **MONEYLENDERS** **PAWNBROKERS** **TRUST COMPANIES**	Please select the answer that is applicable to your firm.

NO.	DCR QUESTION	GUIDANCE
E1	Please select the total annual fees for your firm for the financial year 2025. **REA**	Please select the answer that is applicable to your firm.
POLICIES AND PROCEDURES		
E2 - E2C	Does your firm have a written AML/CFT/CPF policy, procedures and controls? **LARGE-SIZED FIRMS** **Note:** This will be question 1 for Gaming.	For the rest of the sectors, please indicate if your firm has established written AML/CFT/CPF policies, procedures and controls. • If 'Yes', please proceed to questions E2A, E2B and E2C. • If 'No', please proceed to question E3A. For question E2A, please indicate whether the policies are approved by your Senior Management and Board of Directors or senior partners (in the case of partnership). • Select either 'Yes' or 'No' that best reflects your firm's practice. For question E2B, please indicate whether the written policies are kept up-to-date with the regulatory requirements. • Select either 'Yes' or 'No' that best reflects your firm's practice. For question E2C, please indicate if the AML/CFT/CPF policies are provided to all the staff/employees. • Please select the answer that best reflects your firm's practice.

NO.	DCR QUESTION	GUIDANCE
EMPLOYEE TRAINING & AWARENESS PROGRAMME		
E3A	Does your firm conduct training and awareness programmes for the employees on the firm's AML/CFT/CPF practices and measures? **LARGE-SIZED FIRMS**	Select 'Yes' if your firm has provided training and awareness programmes for your employees in relation to your firm's AML/CFT/CPF practices and measures. If 'No', please proceed to question E4.
E3B	What type of AML/CFT/CPF training is provided to your firm's employees? **LARGE-SIZED FIRMS**	Please select the answer that is applicable to your firm.
EMPLOYEE SCREENING PROCEDURES		
E4 - E4D	Does your firm conduct employee screening or background checks on your employees? **LARGE-SIZED FIRMS**	These checks assist RI to assess their employees' risks to ML/TF/PF, fraud and bribery to ensure that they do not abuse their position or be vulnerable/used as a conduit to facilitate ML/TF activities. • If 'Yes' for E4, please proceed to answer question E4A - E4D. Please select the answers that are applicable to your firm. • If 'No' for E4, please proceed to question E5.
INDEPENDENT AUDIT FUNCTION		
E5 - E5D	Does your firm conduct regular AML/CFT/CPF independent audit? **LARGE-SIZED FIRMS**	Select 'Yes' if your firm conducts regular independent audits on AML/CFT/CPF measures to determine the effectiveness and compliance with AMLA and the Policy Document. • Please proceed to answer question E5A - E5D. Please select the answers that are applicable to your firm. If 'No', this will be the last DCR question.

End of Document