

IPPC (Internal Policies, Procedures, and Controls)

ANTI-MONEY LAUNDERING / COMBATING THE FINANCING OF TERRORISM POLICY GOVERNANCE

INTERNAL POLICIES PROCEDURES
AND CONTROL MANUAL



MARCH 2026

Table of Contents

- 1. Introduction**
- 2. Objectives**
- 3. Scope Of IPPC**
- 4. Purpose of the IPPC**
- 5. IPPC Statement**
- 6. Overview of Compliance Framework**
- 7. IPPC Compliance Structure**
- 8. Organisation Chart**
- 9. Compliance Responsibilities**
- 10. Risk Assessment Framework**
- 11. Foreign Politically Exposed Persons (“PEP”)**
- 12. Trusts**
- 13. High-Risk Geographic Locations**
- 14. Suspicious Transaction Report (“STR”)**
- 15. Customer Identification – Unique Identifier (NRIC) & Name Match**
- 16. Customer Due Diligence (CDD)**
- 17. Customer Due Diligence (CDD) Process Flow**
- 18. Enhanced Customer Due Diligence (ECDD)**
- 19. Record Keeping**
- 20. Training/Screening of Staff**

21. Consequences of Non-compliance

22. Appendices

Annex A – DEFINITIONS OF KEY TERMS

Annex B – LIST OF INSTRUCTIONS WITHOUT AML BEARINGS (NON-EXHAUSTIVE)

Annex C – LAW & REGULATIONS GUIDELINES

- (i) The Law Society of Singapore- Prevention of Money Laundering, Financing Terrorism and Proliferation Practice Direction 3.2.1 (dated 6th Oct 2025)
- (ii) Legal Profession Act 1966 (Prevention of Money Laundering and Financing Terrorism) (Amendment) Rules 2025
- (iii) Ministry of Law – Changes to Trustees’ Anti-Money Laundering / Countering the Financing of Terrorism Obligations under the Trustees Act 1967

Annex D – OPERATIONAL RISK MANAGEMENT POLICY

Annex E – GUIDE TO CYBERSECURITY (FOR LAW PRACTICES)

Annex F – CYBERSECURITY INCIDENT MANAGEMENT PROCEDURE

Annex G – AML FLOW PROCESS A THROUGH TRAIN MONITORING PROCESS