



THE LAW SOCIETY
OF SINGAPORE

PREVENTION OF MONEY LAUNDERING, FINANCING OF TERRORISM AND PROLIFERATION FINANCING

SAMPLE ONGOING CUSTOMER DUE DILIGENCE CHECKLIST TEMPLATE

Date: 6 October 2025

Introduction

This sample ongoing Customer Due Diligence (“CDD”) template (“**Sample Ongoing CDD Checklist**”) is designed to assist legal practitioners and law practices in their compliance with the Legal Profession Act 1966 (“LPA”), Legal Profession (Prevention of Money Laundering, Financing of Terrorism and Proliferation Financing) Rules 2015 (“**Rules**”)¹ and the Council’s Practice Direction 3.2.1 on Prevention of Money Laundering, Financing of Terrorism and Proliferation Financing (“**Practice Direction**”).

This Sample Ongoing CDD Checklist is provided for reference only. It is not intended to be used as a comprehensive or exhaustive guide.

It should not be relied upon as the sole resource for compliance or practice management.

Legal practitioners and law practices should carefully review and adapt this checklist to suit their specific requirements, obligations, and professional standards. The ultimate responsibility and accountability for ensuring compliance with the Rules rests with the legal practitioners and law practice. It is suggested that certain sections in this Sample Ongoing CDD template require the signatures from the legal practitioners /partner/director/proprietor of the law practice.

Documents and records obtained through CDD measures must be maintained for at least five (5) years (Rule 20).

MATTER / FILE NO.:		DATE when CDD performed:	
NAME OF CLIENT:		FILED BY (Name of legal practitioner):	
SUBJECT MATTER:			

ONGOING CUSTOMER DUE DILIGENCE ON THE BUSINESS RELATIONSHIP (*Rules 5 and 9*)

Date(s) of Review undertaken:	
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1. I have scrutinised transactions undertaken throughout the course of the business relationship to ensure that those transactions are consistent with my knowledge of —

- | | | | |
|-------|---|------------------------------|-----------------------------|
| (i) | the client | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (ii) | the client’s business | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (iii) | the client’s risk profile | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (iv) | where appropriate, the source of funds for those transactions | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

¹ As amended by the Legal Profession (Prevention of Money Laundering and Financing of Terrorism) (Amendment) Rules 2025, which came into operation on 1 July 2025.

2. I have ensured that the CDD data, documents and information obtained in respect of the following persons are relevant and kept up-to-date, by undertaking reviews of existing CDD data, documents and information, particularly if the client is a higher risk client:

- | | | | |
|-------|--|------------------------------|-----------------------------|
| (i) | the client | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (ii) | each person acting on behalf of the client | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (iii) | each person on whose behalf the client is acting | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (iv) | each beneficial owner of the client | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

3. Based on my assessment of the client:

a. The client is a:

☐ Low Risk Client

☐ Moderate Risk Client – Perform General Customer Due Diligence Measures

If moderate risk is selected, please also refer to senior management. Senior management to determine the frequency of ongoing monitoring.

Frequency (eg, X months): _____

☐ High Risk client – Conduct Enhanced Customer Due Diligence

Provide reasons below:

b. I have assessed the business relationship with the client to be:

☐ Low Risk business relationship

☐ Moderate Risk business relationship – Perform General Customer Due Diligence Measures

If moderate risk is selected, please also refer to senior management. Senior management to determine the frequency of ongoing monitoring.

Frequency (eg, X months): _____

☐ High Risk business relationship – Conduct Enhanced Customer Due Diligence

Provide reasons below:

4. Where I have assessed the client to be a higher risk client, or the business relationship with the client to be a higher risk business relationship, I must —
- (i) perform enhanced CDD diligence measures in accordance with rule 13; and
 - (ii) obtain the approval of the senior management to retain the client or continue the business relationship with the client.

Additional Comments:

5. Has a Suspicious Transaction Report (“STR”) been filed?

☐

Yes

☐

No

Please refer to Rules 5, 15, 16, and Section 70D of the LPA

If yes, please indicate the date the STR was filed:

Please refer to Section D of the Guidance on Analysis of Client Risk, Identification of Material Red Flags, Source of Wealth (SOW) Establishment, Ongoing Monitoring of Clients and their Transactions and Suspicious Transaction Report (STR) Filing Timeline issued by the Ministry of Law (“**Ministry of Law Guidance**”) at [Guidance-on-Analysis-of-Client-Risk-Material-Red-Flags-SOW-Ongoing-Monitoring-and-STR-Filing-Timeline.pdf](#) which states:

“D. STR Filing Timeline

STRs should be filed as soon as reasonably practicable upon the establishment of suspicion.

What is “as soon as reasonably practicable”?

- “As soon as reasonably practicable” should be no longer than 5 business days.
- This will include some flexibility for exceptions e.g. prioritise STR filing for higher risk cases; and STRs for targeted financial sanctions/ sanctions cases are to be filed within one business day, if not immediately”

6. In relation to a STR filed under Rule 5 (ie where there are reasonable grounds to suspect that a client may be engaged in ML, FT or PF), please answer the following questions:

- (a) Have you considered whether it is appropriate to (i) continue a business relationship with the client;² or (ii) establish a new business relationship with, or undertake a new matter for, the client?³
- ☐ Yes ☐ No
- (b) Having considered in (a) above, I will be (i) continuing a business relationship with the client; or (ii) establishing a new business relationship with, or undertaking a new matter for, the client.
- ☐ Yes ☐ No

² Rule 5(1)(b)(i)

³ Rule 5(1)(b)(ii)

7. If yes, please substantiate the reasons for continuing or establishing the business relationship with, or undertaking the matter for, the client⁴:

8. If yes, please subject the business relationship or matter to commensurate risk mitigation measures, including enhanced ongoing monitoring and state the measures below⁵:

Risk mitigation measures: _____

Frequency of enhanced ongoing monitoring: _____

APPROVALS

☐ I certify that the information above is correct and accurate to the best of my knowledge.

Approved by Legal Practitioner

(Optional) Reviewed by Compliance Officer (if any)

Name and Signature

Name and Signature

Date

Date

For High Risk Cases, approval to establish a business relationship/continue a business relationship from senior management⁶ required and obtained from:

Signed by

Signed by

Name and Signature

Name and Signature

Designation

Designation

Date

Date

⁴ Rule 5(2)(a)

⁵ Rule 5(2)(b)

⁶ The firm should designate the positions or individuals who are "senior management" in their firm's policy.