

and independent documentation, an AML/CTF program must comply with the requirements specified in paragraph 4.9.5.

4.9.5 An AML/CTF program must include appropriate risk-based systems and controls for the reporting entity to determine:

- (1) what and how many reliable and independent documents the reporting entity will use for the purpose of verification;
- (2) whether a document is sufficiently contemporaneous for use in verification;
- (3) whether, and in what circumstances, the reporting entity is prepared to rely upon a copy of a reliable and independent document;