



Republic of Serbia

MINISTRY OF
FINANCE

Games of Chance Administration
Balkanska 53
Belgrade

Form: KL-028-01/01
Date of adoption: 05.02.2024

CHECKLIST

for checking the implementation of the Law on the Prevention of Money Laundering and Financing of Terrorism ("Official Gazette RS", no. 113/17, 91/19, 153/20 and 92/2023, hereinafter: LPMLTF) by organisers of games of chance through means of electronic communication (offsite inspection)

Date:

I GENERAL DATA ABOUT THE OBLIGED ENTITY:

1	Name of the obliged entity:	
2	Address, email address and phone number:	
3	Company registration number	
4	TIN	
5	Representative / responsible person	
6	Job position	
7	Personal number/Passport number	
8	Address of registered offices	
9	Business unit	
10	Total number of entity's employees	
11	Total number of entity's employees assigned to jobs related to LPMLTF	

	Question:	Degree of risk:	Assessed degree of risk:	Score:	Response of the subject entity:	Notes of the inspector
II ACTIVITIES OF THE OBLIGED ENTITY:						
1	Did the obliged entity appoint authorized person and its deputy in accordance with Article 5, paragraph 2, point 3 of the Law on the Prevention of Money Laundering and Financing of Terrorism?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Risk level 0 (no risk, score 0) - the obliged entity appointed an authorized person and its deputy Risk level 1 (score 5) - the obliged entity appointed an authorized person or its deputy Risk level 2 (score 30) - the obliged entity did not appoint neither the authorized person or its deputy			
2	If the obliged entity appointed authorized person and deputy, did the obliged entity provide the Administration for the Prevention of Money Laundering (hereinafter: APML) with data on name and job position of the authorized person and its deputy in accordance with Article 52, paragraph 3 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Risk level 0 (no risk, score 0) - data has been provided to APML within the set time frame Risk level 1 (score 5) - data has been provided to APML outside the set time frame, i.e. within 15 days from the date of appointment Risk level 2 (score 10) - data has been provided to APML within the set time frame, but not all required data has been provided Risk level 3 (score 15) - data on authorized person and/or its deputy have not been provided to APML			
3	If the obliged entity has appointed an authorized person and its deputy, do they meet the requirements set forth in Article 50 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Risk level 0 (no risk, score 0) - the appointed authorized person and its deputy meet the requirements set forth in Article 50 of the LPMLTF Risk level 1 (score 5) - the appointed authorized person or its deputy do not meet the requirements set forth in Article 50 of the LPMLTF Risk level 2 (score 10) - neither the appointed authorized person nor its deputy meet the requirements set forth in Article 50 of the LPMLTF			
4	Did the obliged entity provide APML with data on name and job position of the member of top management who is responsible for implementation of LPMLTF in accordance with Article 52, paragraph 3 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Risk level 0 (no risk, score 0) - data has been provided to APML within the set time frame Risk level 1 (score 5) - data has been provided to APML outside the set time frame, i.e. within 15 days from the date of appointment Risk level 2 (score 10) - data has been provided to APML within the set time frame, but not all data required by Article 52, paragraph 3 of the LPMLTF has been provided Risk level 3 (score 15) - no data has been provided to APML			
5	Has the obliged entity established a procedure according to which at the time person is employed on job that is subject to provisions of LPMLTF it is necessary to check whether the candidate has been convicted of criminal offences related to unlawful financial gain or connected to terrorism - Article 55, paragraph 1 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Risk level 0 (no risk, score 0) - procedure has been established and all documents have been collected in accordance with Article 55, paragraph 1 of the LPMLTF Risk level 1 (score 25) - procedure has been established, but not all documents have been collected in accordance with Article 55, paragraph 1 of the LPMLTF Risk level 2 (score 50) - procedure has not been established, and not all documents have been collected in accordance with Article 55, paragraph 1 of the LPMLTF			

6	Has the obliged entity developed a regular annual training, education, and professional development program for employees on the prevention of money laundering and financing of terrorism in accordance with Article 53, paragraph 3 of the LPMLTF and Article 12 of the Rulebook on Compliance with the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - program has been developed in accordance with LPMLTF and the Rulebook</p> <p>Risk level 1 (score 5) - the program, which contents are compliance with the Rulebook, has been developed, but not within the time frame provided by Article 53, paragraph 3 of the LPMLTF</p> <p>Risk level 2 (score 10) - the program has been developed within the time frame provided by Article 53, paragraph 3 of the LPMLTF, but does not include all elements required by the Rulebook</p> <p>Risk level 3 (score 15) - the program has been developed, but not within the time frame provided by Article 53, paragraph 3 LPMLTF and which contents do not comply with the Rulebook</p> <p>Risk level 4 (score 20) - program has not been developed</p>			
7	Does the obliged entity prepare an official report about the conducted employee training in accordance with Article 12, paragraph 3 of the Rulebook on Methodology for Compliance with the Law on the Prevention of Money Laundering and Terrorism Financing?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - an official report on the training is prepared</p> <p>Risk level 1 (score 5) - no official report on the training is prepared</p>			
8	Has the obliged entity through its internal regulations defined the powers and responsibilities of governing bodies, organisational units, authorized persons in performing internal controls, as well as the method and schedule of internal controls in accordance with Article 9 of the Rulebook on Compliance with the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - the obliged entity through its internal regulations defined the powers and responsibilities of governing bodies, organisational units, authorized persons in performing internal controls, as well as the method and schedule of internal controls in accordance with Article 9 of the Rulebook on Compliance with the LPMLTF?</p> <p>Risk level 1 (score 5) - the obliged entity did not prepare the internal regulations</p>			
9	Has the obliged entity ensure regular internal controls and prepared an annual report on the internal controls and the measures taken after the control in accordance with Article 54 of the LPMLTF and Article 10 of the Rulebook on Compliance with the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - regular internal control is ensured and annual report is prepared in accordance with the Rulebook</p> <p>Risk level 1 (score 5) - internal control is ensured and annual report with required contents has been prepared, but not within the time frame set forth in the Rulebook</p> <p>Risk level 2 (score 10) - internal control has been ensured and the annual report has been prepared within the required time frame, but it does not contain all elements required by the Rulebook</p> <p>Risk level 3 (score 15) - internal control is ensured and the annual report has been prepared, but not within the time frame provided by the Rulebook and does not have required contents</p> <p>Risk level 4 (score 20) - internal control has not been ensured and annual report has not been prepared</p>			

10	Has the obliged entity prepared a list of indicators for identifying persons and transactions reasonably suspected of involving money laundering or terrorism financing, in accordance with Article 69, paragraph 1 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - List of indicators has been prepared and includes indicators developed by the Games of Chance Administration in accordance with Article 69, paragraph 1 of the LPMLTF</p> <p>Risk level 1 (score 5) - List of indicators has been prepared, but does not include all indicators developed by the Games of Chance Administration in accordance with Article 69, paragraph 1 of the LPMLTF</p> <p>Risk level 2 (score 10) - List of indicators has not been prepared</p>			
11	Has the obliged entity through its internal regulation define a procedure for establishing if a customer or a beneficial owner is a politically exposed person, in accordance with Article 38 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p>Risk level 0 (no risk, score 0) - internal regulation defines a procedure for establishing if a customer or a beneficial owner is a politically exposed person and additional actions and measures provided by Article 38, paragraphs 2 and 3 of the LPMLTF have been applied</p> <p>Risk level 1 (score 10) - internal regulation that defines the procedure for establishing if a customer or a beneficial owner is a politically exposed person has been adopted, but no additional actions or measures provided by Article 38, paragraphs 2 and 3 of the LPMLTF have been applied</p> <p>Risk level 2 (score 20) - internal regulation does not define a procedure for establishing if a customer or a beneficial owners is a politically exposed person and additional actions and measures provided by Article 38, paragraphs 2 and 3 of the LPMLTF have not been applied</p>			
Risk level	Insignificant	Low	Medium	High	Critical	
Total score	0-39	40-79	80-119	120-159	160-200	

Inspectors:			Attended by: