



Republic of Serbia

MINISTRY OF  
FINANCE

Games of Chance Administration  
Balkanska 53  
Belgrade

Form: KL-029-01/01  
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 (onsite 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	Has the obliged entity conduct an analysis of money laundering and terrorism financing risk?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - the obliged entity conducted the analysis of money laundering and terrorism financing risk <b>Risk level 1 (score 60)</b> - the obliged entity did not conduct the analysis of money laundering and terrorism financing risk			
1.1	If yes, please specify the date on which the procedure was adopted:					

2	If yes, has the obliged entity conducted an analysis for money laundering and terrorist financing risk for its entire business operation, as well as for each group or type of customer, business relationship, or service provided by the obliged entity as part of its business activities?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - risk analysis was conducted for entire business operation of the obliged entity, as well as for each group or type of customer, business relationship or service provided by the obliged entity as part of its business activities <b>Risk level 1 (score 15)</b> - risk analysis has been conducted only for entire business operation of the obliged entity or only for each group or type of customer, business relationship, or service provided by the obliged entity as part of its business activities <b>Risk level 2 (score 25)</b> - risk analysis for entire business operation of the obliged entity, as well as for each group or type of customer, business relationship or service provided by the obliged entity as part of its business activities was not conducted			
3	If yes, has the obliged entity conduct the analysis of money laundering and terrorism financing risk in accordance with the national money laundering and terrorism financing risk assessment (hereinafter: National Risk Assessment), as well as in accordance with Guidelines adopted by the GCA?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - risk analysis conducted in accordance with the National Risk Assessment and the Guidelines <b>Risk Level 1 (score 15)</b> - risk analysis conducted in accordance with the National Risk Assessment or the Guidelines <b>Risk Level 2 (score 25)</b> - risk analysis not conducted in accordance with the National Risk Assessment and the Guidelines			
4	Does the obliged entity check compliance of system and procedures for implementation of the Law in accordance with Article 8, paragraph 2 of the Rulebook on Compliance with the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk Level 0 (no risk, score 0)</b> - the obliged entity checks compliance of system and procedures for implementation of the Law in accordance with Article 8, paragraph 2 of the Rulebook on Compliance with the LPMLTF. <b>Risk Level 1 (score 5)</b> - the obliged entity did not check compliance of system and procedures for implementation of the Law in accordance with Article 8, paragraph 2 of the Rulebook on Compliance with the LPMLTF.			
5	Does the obliged entity carry out actions and measures from Article 7 of the LPMLTF regarding collection of winnings, placement of wagers or in both cases when transaction value exceed 2000 euro in dinar equivalent, regardless of whether it is one or more interconnected transactions?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk Level 0 (no risk, score 0)</b> - the obliged entity takes all actions and measures of customer due diligence in accordance with Article 7 LPMLTF, <b>Risk Level 1 (score 5)</b> - the obliged entity did not take all actions and measures of customer due diligence in accordance with Article 7, paragraph 1 of LPMLTF and did not prepare report, but acted in accordance with Article 7, paragraph 2 of the LPMLTF, <b>Risk Level 2 (score 10)</b> - the obliged entity did not take all actions and measures of customer due diligence in accordance with Article 7 of the LPMLTF			
6	Did obliged entity have customers that carried out transactions which value was 15,000 euro or more in dinar equivalent?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - the obliged entity provided the Administration with data on each transaction which value was 15,000 or more in dinar equivalent in accordance with Article 47 of the LPMLTF <b>Risk level 1 (score 5)</b> - the obliged did not have any customers that carried out transactions which value was 15,000 euro or more in dinar equivalent <b>Risk level 2 (score 10)</b> - the obliged entity did not provided the Administration with data on each transaction which value was 15,000 or more in dinar equivalent in accordance with Article 47 of the LPMLTF			
7	Does the obliged entity have a business relationship with a customer who is a politically exposed person?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - no relationship <b>Risk level 1 (score 5)</b> - has relationship			
8	Does the obliged entity have customers originating from countries with strategic deficiencies in the anti-money laundering and counter-terrorism financing system?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - no such customer <b>Risk level 1 (score 5)</b> - has such customers			
9	Does the obliged entity apply enhanced customer due diligence actions and measures in case of customers originating from countries with strategic deficiencies in anti-money laundering and counter-terrorism financing system, in accordance with Article 41 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score 0)</b> - the internal regulation defines enhanced customer due diligence actions and measures in case of customers originating from countries with strategic deficiencies in anti-money laundering and counter-terrorism financing system, in accordance with Article 41, paragraph 2 of the LPMLTF <b>Risk level 1 (score 5)</b> - the obliged entity adopted internal regulation, but failed to implement enhanced actions and measures provided by Article 41, paragraph 2 of the LPMLTF <b>Risk level 2 (score 10)</b> - the obliged entity did not adopt internal regulation and failed to implement enhanced actions and measures provided by Article 41, paragraph 2 of the LPMLTF			
10	Does the obliged entity maintain a record of data on customers and business relationships referred to in Article 98, paragraph 1, point 1) of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<b>Risk level 0 (no risk, score)</b> - records are maintained and include all data required by Article 98, paragraph 1 of the LPMLTF <b>Risk level 1 (score 5)</b> - records are maintained, but do not include all data required by Article 98, paragraph 1 of the LPMLTF <b>Risk level 2 (score 10)</b> - no records are maintained			

11	Does the obliged entity maintain records referred to in Article 99, paragraph 1, point 3) and points 7)-11) and provide them to the Administration in accordance with Article 47 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p><b>Risk level 0 (no risk, score 0)</b> - the obliged entity maintains records required by Article 99, paragraph 1, point 3) and points 7)-11) and provide them to the Administration in accordance with Article 47 of the LPMLTF</p> <p><b>Risk level 1 (score 5)</b> - the obliged entity maintains records required by Article 99, paragraph 1, point 3 and points 7)-11), but fails to provide them to the Administration in accordance with Article 47 of the LPMLTF</p> <p><b>Risk level 2 (score 10)</b> - the obliged entity does not maintain records required by Article 99, paragraph 1, point 3 and points 7)-11) of the LPMLTF</p>			
12	Does the obliged entity retain documentation during the time period provided by Article 95 of the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p><b>Risk level 0 (no risk, score 0)</b> - documentation is retained in accordance with the requirements</p> <p><b>Risk level 1 (score 5)</b> - documentation is not retained in accordance with the requirements</p>			
13	Does the obliged entity maintain records in electronic form, in chronological order and in the manner that allows adequate access to data, information and documentation for the purpose of Article 11 of the Rulebook on Compliance with the LPMLTF?	<input type="checkbox"/> YES <input type="checkbox"/> NO	<p><b>Risk level 0 (no risk, score 0)</b> - the obliged entity maintains records in electronic form, in chronological order and in the manner that allows adequate access to data, information and documentation for the purpose of Article 11 of the Rulebook on Methodology of Compliance with the LPMLTF</p> <p><b>Risk level 1 (score 5)</b> - does not maintain records in accordance with Article 11 of the Rulebook</p> <p><b>Risk level 2 (score 10)</b> - does not maintain records</p>			
<b>Risk level</b>	<b>Insignificant</b>	<b>Low</b>	<b>Medium</b>	<b>High</b>	<b>Critical</b>	
<b>Total score</b>	<b>0-27</b>	<b>28-55</b>	<b>56-83</b>	<b>84-111</b>	<b>112-140</b>	

<b>Inspectors:</b>			<b>Attended by:</b>