AKT

AKT · Resources

Customer due diligence checklist and template

A risk-based customer due diligence checklist for corporate and individual customers. It shows what you must always do, what you may simplify at low risk and what you must enhance at high risk, with the legal basis for each step. Adapt it to your own business-wide risk assessment and procedures.

Reviewed 27 November 2026 · aktkyc.com/en/resources/cdd-checklist

How this checklist works

CDD is risk-based. The same steps apply to every customer, but the customer's risk decides how far you go in each one (Chapter 3, Section 14 of the Swedish AML Act (2017:630); AMLR Article 20(2)). The checklist therefore follows the order of the work:

1. **Assess the customer's risk.** A first assessment based on who the customer is, where they are and which service is involved.
2. **Carry out the core measures.** Identity, representatives, beneficial owner, PEP, high-risk third country and purpose. They apply to every customer.
3. **Adjust the measures to the risk.** Simplify at low risk and enhance at high risk.
4. **Set the risk profile and decide.**
5. **Follow up at the pace the risk requires.**

The customer's risk profile must be based on your business-wide risk assessment (Chapter 2, Section 3). Your procedures must reflect your size, your business and the risks you have identified (Chapter 2, Section 8). The evidence column gives examples; your procedure should state what you accept.

The Swedish AML Act applies today. From 10 July 2027 the EU Anti-Money Laundering Regulation (AMLR), Regulation (EU) 2024/1624, applies directly (Article 90). The AMLR column maps each step. A dash means the law does not name the measure expressly. Background is in the KYC guide.

Step 1: Assess the customer's risk

Make a first assessment as soon as you know who the customer is, where they are and which service is involved. It decides how much you need to do in steps 2 and 3. Update it once the information has been verified. The law gives examples of factors to consider. The lists are not exhaustive.

Risk factor	May indicate higher risk	May indicate lower risk	Swedish AML Act	AMLR
☐ Customer	Unusual or overly complex ownership, cash-intensive business, nominee shareholders or bearer shares, a vehicle holding one person's assets	A state, region or municipality, or a company they control. A company listed on a regulated market	Ch. 2, Section 4 points 1 and 5, Section 5 points 1–4	Annex II(1), III(1)
☐ Geography	Residence in a country without effective AML systems, with significant corruption, under sanctions or supporting terrorism	Residence in the EEA, or in a country with effective AML systems and low corruption	Ch. 2, Section 4 points 2–4, Section 5 points 5–8	Annex II(3), III(3)

Risk factor	May indicate higher risk	May indicate lower risk	Swedish AML Act	AMLR
☐ Service, transaction and channel	Products or transactions that may favour anonymity, payment from an unknown third party, remote contact without reliable identity verification, new products and technology	Services of limited scope, where the risk is contained by, for example, financial limits or transparency of ownership	Ch. 2, Section 5 points 9–10	Annex II(2), III(2)

Some customers always require enhanced measures. This applies if the customer or beneficial owner is a PEP, family member or close associate, and if the customer is established in a high-risk third country (Chapter 3, Sections 17 and 19; AMLR Articles 29(4), 42 and 46). It applies whatever the assessment otherwise shows. See step 3.

See customer risk assessment.

Step 2: Carry out the core measures

The core measures apply to every customer. The risk decides how far you go and which evidence is enough (Chapter 3, Section 14; AMLR Article 20(2)).

Corporate customer

#	What to do	Evidence (examples)	Swedish AML Act	AMLR
☐ 1	Identify the company and verify its identity	Register extract or another independent, reliable source	Ch. 3, Section 7, first paragraph	Art. 20(1)(a), 22(1)(b)
☐ 2	Verify the identity and authority of the person representing the company	ID document or electronic ID, registered signatory rights or a power of attorney	Ch. 3, Section 7, third paragraph	Art. 20(1)(i)
☐ 3	Search the beneficial ownership register	Register extract, dated	Ch. 3, Section 8, first paragraph	Art. 23(4)
☐ 4	Understand the ownership and control structure	Ownership chart, share register, articles of association, agreements	Ch. 3, Section 8, first paragraph	Art. 20(1)(b)
☐ 5	Verify the beneficial owner's identity	ID document or another reliable source	Ch. 3, Section 8, first paragraph	Art. 20(1)(b)
☐ 6	No beneficial owner: record the chair, CEO or equivalent	Documented investigation showing why	Ch. 3, Section 8, third paragraph	Art. 22(2)
☐ 7	Check whether the customer or beneficial owner is a PEP, family member or close associate	Question to the customer and a check against a source named in your procedure	Ch. 3, Section 10	Art. 20(1)(g)
☐ 8	Check whether the company is established in a high-risk third country	The European Commission's list	Ch. 3, Section 11	Art. 29
☐ 9	Obtain the purpose and intended nature of the relationship	Engagement description, expected services, volumes and flows	Ch. 3, Section 12	Art. 20(1)(c)

Exception: the beneficial ownership requirements in Chapter 3, Section 8, first paragraph do not apply to a limited company whose shares are traded on a regulated market in Sweden or the EEA, or on an equivalent market outside the EEA. The same goes for its subsidiaries (Chapter 3, Section 8, second paragraph).

Steps 3–6 are covered in depth in beneficial ownership.

Individual customer

#	What to do	Evidence (examples)	Swedish AML Act	AMLR
☐ 1	Identify the customer and verify their identity	ID document or electronic ID	Ch. 3, Section 7, first and second paragraphs	Art. 20(1)(a), 22(1)(a)
☐ 2	Someone acting for the customer: verify their identity and authority	Power of attorney or other proof of authority, ID document	Ch. 3, Section 7, third paragraph	Art. 20(1)(i)
☐ 3	Establish whether someone else stands behind the customer	The customer's statement and your assessment	Ch. 3, Section 8; Ch. 1, Section 3 of Act 2017:631	Art. 20(1)(h)
☐ 4	Check whether the customer is a PEP, family member or close associate	Question to the customer and a check against a source named in your procedure	Ch. 3, Section 10	Art. 20(1)(g)
☐ 5	Check whether the customer is established in a high-risk third country	The European Commission's list	Ch. 3, Section 11	Art. 29
☐ 6	Obtain the purpose and intended nature of the relationship	Engagement description, expected transactions	Ch. 3, Section 12	Art. 20(1)(c)

AMLR Article 22(1)(a) sets the minimum data for an individual: all names, place and full date of birth, nationalities and usual place of residence.

Sanctions

Under the Swedish AML Act, sanctions screening sits outside the CDD rules, though residence in a sanctioned country may indicate high risk (Chapter 2, Section 5, point 7). Under AMLR, sanctions screening of the customer and beneficial owners becomes a CDD measure (Article 20(1)(d)). See sanctions screening.

Step 3: Adjust the measures to the risk

Low risk: what you may simplify

If the risk is assessed as low, you may apply simplified measures. The steps must still be carried out, but the checks may be more limited and carried out differently (Chapter 3, Section 15).

Measure	What you may simplify	Swedish AML Act	AMLR
☐ Identity verification	Verification may be completed later where needed so as not to interrupt the normal conduct of business, but no later than when the relationship is established. Under AMLR, no later than 60 days after the relationship begins.	Ch. 3, Section 9, second and third paragraphs	Art. 33(1)(a), 33(3)
☐ Purpose and nature	Less information, which may be inferred from the type of service or relationship	Ch. 3, Section 15	Art. 33(1)(c)
☐ Updating customer information	Less often	Ch. 3, Section 15	Art. 33(1)(b)
☐ Transaction scrutiny	Less often or less thoroughly, but enough to detect unusual or suspicious transactions	–	Art. 33(1)(d)

Your procedures must set out which simplified measures you use for which types of customer. You must also check regularly that the conditions for simplified measures are still met (AMLR Article 33(2) and (4)).

Simplified measures must not be used (AMLR Article 33(5)):

- if you doubt that the customer's information is true, or find gaps in it
- if the factors indicating lower risk no longer exist
- if monitoring of the customer rules out lower risk
- where money laundering or terrorist financing is suspected
- where you suspect the customer is trying to evade targeted financial sanctions

High risk: what you must enhance

If the risk is assessed as high, the checks, assessments and investigations must be especially thorough (Chapter 3, Section 16; AMLR Article 34). Which measures are needed depends on what makes the customer high risk. The law gives examples:

Measure	Evidence (examples)	Swedish AML Act	AMLR
☐ Additional information on the customer and the beneficial owner	Business description, annual report, background of the owners	Ch. 3, Section 16	Art. 34(4)(a)
☐ Additional information on the intended nature of the relationship	Detailed engagement description, expected flows and counterparties	Ch. 3, Section 16	Art. 34(4)(b)
☐ Source of funds and wealth	Bank statements, contracts, tax return, purchase documents	Ch. 3, Section 16, second paragraph	Art. 34(4)(c)
☐ Reasons for intended or completed transactions	The customer's explanation with evidence	–	Art. 34(4)(d)
☐ Approval from a senior decision-maker	Documented approval	Ch. 3, Sections 17 and 19	Art. 34(4)(e)
☐ Enhanced monitoring	More frequent follow-up and more checks	Ch. 3, Sections 17 and 19	Art. 34(4)(f)

The Swedish AML Act expressly requires approval and enhanced monitoring for high-risk third countries and PEPs. For other high-risk customers, your procedure should state what you do.

Always enhanced: the customer or beneficial owner is a PEP

In addition to the core measures, you must always (Chapter 3, Section 19; AMLR Article 42):

1. take appropriate measures to establish the source of the assets in the relationship,
2. apply enhanced ongoing monitoring, and
3. obtain approval from a senior decision-maker before deciding to enter into or end the relationship. Under AMLR, the approval covers entering into or continuing the relationship.

This also covers family members and close associates (Chapter 3, Section 19, second paragraph; AMLR Article 46). See PEP screening.

Always enhanced: the customer is established in a high-risk third country

Enhanced due diligence is mandatory (Chapter 3, Section 17; AMLR Article 29(4)). It must at least include enhanced monitoring and obtaining:

- additional information on the customer and the beneficial owner,
- additional information on the purpose and nature of the relationship,
- information on the financial situation and the source of funds, and
- approval from a senior decision-maker.

Step 4: Set the risk profile and decide

#	What to do	Evidence (examples)	Swedish AML Act	AMLR
☐ 1	Set the customer's risk profile	Risk assessment with reasons, based on your business-wide risk assessment	Ch. 2, Section 3	Art. 20(2)
☐ 2	Check that the measures match the risk	Review of steps 2 and 3	Ch. 3, Section 14	Art. 20(4)
☐ 3	PEP or high-risk third country: obtain approval	Approval from a senior decision-maker	Ch. 3, Sections 17 and 19	Art. 29(4), 42(1)(a)
☐ 4	Decide: onboard or decline	Documented decision with reasons	Ch. 3, Section 1	Art. 21(1) and (3)

Your procedure decides how many risk levels you use. Under AMLR you must always be able to show your supervisor that the measures are appropriate to the risks (Article 20(4)).

Step 5: Follow up at the pace the risk requires

- **Ongoing and when needed.** Your knowledge must stay current and sufficient for the assessed risk (Chapter 3, Section 13). Update the risk profile when there is reason to (Chapter 2, Section 3).
- **Intervals by risk.** Under AMLR the time between updates of customer information depends on the risk. It may never exceed one year for customers under enhanced measures and five years for all other customers (Article 26(2)).
- **When something changes.** Review the information when the customer's circumstances change or new relevant information comes to light (AMLR Article 26(3)).
- **Sanctions.** Check regularly, at a frequency proportionate to the risk (AMLR Article 26(4)).
- **When something looks wrong.** Apply enhanced measures to assess whether there are reasonable grounds for suspicion (Chapter 4, Section 2).

Your procedure sets the interval for each risk level. See ongoing monitoring.

When must CDD be carried out?

- **New business relationship.** Measures are taken when the relationship is established (Chapter 3, Section 4; AMLR Article 19(1)(a)). Identity verification of the customer and beneficial owner must be complete before then, except at low risk as described in step 3 (Chapter 3, Section 9).
- **Occasional transactions.** From EUR 15,000 today, including smaller linked transactions that together reach that amount (Chapter 3, Section 4). Under AMLR the threshold is EUR 10,000 (Article 19(1)(b)).
- **Lower thresholds in some businesses.**
  - Gambling: payment of winnings or wagers from EUR 2,000 (Chapter 3, Section 5; AMLR Article 19(5)).
  - Trading in goods: cash amounts from EUR 5,000 (Chapter 3, Section 6).
  - Transfers of funds or crypto-assets: above EUR 1,000 (Chapter 3, Section 4, second paragraph, point 3). Under AMLR, EUR 1,000 applies to certain transfers and to crypto-assets (Article 19(2)–(3)).
  - Under AMLR, the customer's identity must be verified for cash transactions from EUR 3,000, unless the Member State has set a cash payment limit of EUR 3,000 or less (Article 19(4)).
- **Regardless of amount under AMLR.** Where money laundering or terrorist financing is suspected, and where you doubt that earlier customer information is reliable (Article 19(1)(d)–(e)).
- **During the relationship.** See step 5.

What should you document?

Keep records of CDD measures for five years (Chapter 5, Section 3). The period runs from when the measure was taken or, for a business relationship, from when it ended. You may keep them longer where necessary to prevent, detect or investigate money laundering, but no more than ten years in total (Chapter 5, Section 4).

For each customer, keep at least:

- the risk assessment and the risk factors it rests on
- identity evidence for the customer, representatives and beneficial owners
- the register search and your analysis of ownership and control
- the PEP and high-risk third country checks
- the purpose and nature of the relationship
- which simplified or enhanced measures you chose, why, and what they showed
- the risk profile and the reasons for it
- the decision, who made it and when
- follow-ups and changes to the risk profile over time

You must also be able to say quickly whether you have had a business relationship with a given person in the past five years, and its nature (Chapter 4, Section 7). AMLR Article 21(3) also requires records of decisions and reasons, including refusals.

What if you cannot complete CDD?

If you cannot complete the checklist, you must not establish or maintain the relationship or carry out the transaction (Chapter 3, Section 1). Document the decision. If you have reasonable grounds to suspect money laundering, report to the Swedish Police Authority, even if the transaction does not go ahead (Chapter 4, Section 3).

This checklist is a summary. The legislation and your supervisor's guidance take precedence.

Sources

- Lag (2017:630) om åtgärder mot penningtvätt och finansiering av terrorism (Swedish AML Act), riksdagen.se https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/lag-2017630-om-atgarder-mot-penningtvatt-och_sfs-2017-630/
- Lag (2017:631) om registrering av verkliga huvudmän (Act on the Registration of Beneficial Owners), riksdagen.se https://www.riksdagen.se/sv/dokument-och-lagar/dokument/svensk-forfattningssamling/lag-2017631-om-registrering-av-verkliga_sfs-2017-631/
- Regulation (EU) 2024/1624 (AMLR), EUR-Lex https://eur-lex.europa.eu/eli/reg/2024/1624/oj/eng