

CHANGE IMPACT RECORD

Code of Practice for the Remote Gambling Industry: Anti-Money Laundering, Countering the Financing of Terrorism and Counter Proliferation Financing Arrangements: 2 requirement changes

Acme Group · A legal instrument changed · signed 24 September 2026

Effective date	1 December 2026
Transitional window	60 days
Deadline	30 January 2027
Risk rating, calculated 24 September 2026	Medium
128 day(s) to the deadline; the rating follows the most material obligation affected (sanc-001, sanc-004). Fixed matrix of obligation category against days remaining.	

What this record cites

Code of Practice for the Remote Gambling Industry: Anti-Money Laundering, Countering the Financing of Terrorism and Counter Proliferation Financing Arrangements - AML Code (Remote) §9.3 (Amended requirement)

Code of Practice for the Remote Gambling Industry: Anti-Money Laundering, Countering the Financing of Terrorism and Counter Proliferation Financing Arrangements - AML Code (Remote) §9.2 (Restated, wording unchanged)

Affected obligations (3)

sanc-001 · Amended requirement

AML Code (Remote) §9.3 · materiality high · Acme Affiliates Ltd, Acme Studios Ltd

Clause before

9.3 Licence Holders should ensure they have arrangements in place to ensure they are regularly updated on changes to the relevant sanctions lists in order to ensure that freezing and disclosure requirements are implemented without delay. Licence Holders should also include a consideration of the likelihood of dealing with a person on a sanctions list as part of their risk assessment and also ensure that employees with AML/CFT/CPF responsibilities are aware of financial sanctions and receive appropriate training. A positive link to an individual subject to sanctions should be reported without delay on a SAR, but GFIU should also be contacted immediately to ensure the issue is flagged and dealt with expeditiously.

Clause after

9.3 Licence Holders should ensure they have arrangements in place to ensure they are regularly updated on changes to the relevant sanctions lists in order to ensure that freezing and disclosure requirements are implemented without delay. Licence Holders should also include a consideration of the likelihood of dealing with a person on a sanctions list as part of their risk assessment and also ensure that employees with AML/CFT/CPF responsibilities are aware of financial sanctions and receive appropriate training. A positive link to an individual subject to sanctions should be reported without delay on a SAR, but GFIU should also be contacted immediately to ensure the issue is flagged and dealt with expeditiously. [Illustrative amendment for this sample only; the Code has not been amended:] Licence Holders should keep a record of the date on which each change to a relevant sanctions list was received and the date on which screening against that change was completed.

sanc-003 · Restated, wording unchanged

AML Code (Remote) §9.2 · materiality high · Acme Affiliates Ltd, Acme Studios Ltd

Requirement text (unchanged)

9.2 The approach to targeted financial sanctions does not provide for a monetary threshold or a 'risk based' approach. The Gambling Commissioner requires Licence Holders to take steps to access the consolidated list, or an equivalent list provided by a commercial database, as part of their Further Due Diligence process. Licence Holders should also ensure that where automated systems are used, these are capable of making "fuzzy" logic matches in order to identify variant spellings of names. Where there is reason to believe a person appearing on a sanctions list is or has been engaged with a Licence Holder then the matter should be subject to immediate disclosure to the GFIU and it will be necessary to freeze, seize or surrender funds under the control of a person or institution on the sanctions list without delay.

sanc-004 · Amended requirement

AML Code (Remote) §9.3 · materiality high · Acme Affiliates Ltd, Acme Studios Ltd

Clause before

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9.3 Licence Holders should ensure they have arrangements in place to ensure they are regularly updated on changes to the relevant sanctions lists in order to ensure that freezing and disclosure requirements are implemented without delay. Licence Holders should also include a consideration of the likelihood of dealing with a person on a sanctions list as part of their risk assessment and also ensure that employees with AML/CFT/CPF responsibilities are aware of financial sanctions and receive appropriate training. A positive link to an individual subject to sanctions should be reported without delay on a SAR, but GFIU should also be contacted immediately to ensure the issue is flagged and dealt with expeditiously. [Illustrative amendment for this sample only; the Code has not been amended:] Licence Holders should keep a record of the date on which each change to a relevant sanctions list was received and the date on which screening against that change was completed.

Affected evidence (2)

Acme Studios Ltd board minutes, 18 June 2026: screening provider and name-matching settings recorded (sanc-003) - No date or verification issue is recorded against it.

No issue recorded

Acme Affiliates Ltd board minutes, 12 March 2026: sanctions screening procedure v2.1 adopted (sanc-004) - It was uploaded before the amended wording takes effect.

Needs refreshing**Required actions (3)**

Review the amended requirement at AML Code (Remote) §9.3 (sanc-001) against the evidence and procedures currently held for it.

Owner: Owen Clarke · Due: 30 January 2027 · Open

Refresh or replace "Acme Affiliates Ltd board minutes, 12 March 2026: sanctions screening procedure v2.1 adopted", held as evidence for sanc-004.

Owner: Maria Reyes · Due: 30 January 2027 · Open

Review the amended requirement at AML Code (Remote) §9.3 (sanc-004) against the evidence and procedures currently held for it.

Owner: Maria Reyes · Due: 30 January 2027 · Open

AI-assisted notes accepted into this record

Plain-English summary of what changed · AI-assisted · accepted by Maria Reyes on 23 September 2026

The amended §9.3 keeps its existing wording on staying updated about changes to the relevant sanctions lists, the risk assessment, staff training and reporting a positive link. It adds one closing sentence, which provides for a record of the date each change to a relevant sanctions list was received and the date screening against that change was completed.

Passages marked AI-assisted were drafted by an AI model from the source text shown and were accepted by the named person on the date given. Everything else in this record was derived by the system or written by a person.

Sign-off

Owen Clarke · compliance officer

Signed 24 September 2026

I have reviewed the affected obligations, evidence items and required actions in this record and confirm that the entries are accurate to the best of my knowledge. I understand that this record cannot be edited once signed, and that any correction will be made by a superseding record.

This record lists the obligations and evidence items affected by a change and the actions recorded against them. It was derived from the legal source text cited and the operator's own register. It is not legal advice and does not state that any requirement is or is not met.