KOHERIANT VERIFY

What a Wwft client file has to contain

A check against the Dutch Wet ter voorkoming van witwassen en financieren van terrorisme, for estate agents, brokers and valuers. Work down it against one real client file you hold today. The point is not whether you did the research — it is whether the file proves you did.

BEFORE YOU ACT FOR THE CLIENT

- ☐ The client is identified, and that identity is verified against a reliable, independent source.
- ☐ Where the client is not a natural person: the entity, its legal form, its registered office and the person authorised to act for it are recorded.
- ☐ The ultimate beneficial owners are identified, the ownership and control test is applied, and the result is written down. In the Netherlands the test is an interest of MORE THAN 25 per cent, not 25 per cent or more.
- ☐ The nature and intended purpose of the business relationship are recorded.
- ☐ A risk classification has been made, in writing, with the reason for it.
- ☐ Where the risk is higher — a politically exposed person, a complex ownership structure, a country outside the EU — enhanced measures have been applied and evidenced.
- ☐ The source of the funds has been established where the risk requires it.
- ☐ The decision to accept the client is recorded, dated, and attributable to a named person.

You may not act for the client, or carry out the transaction, before the client due diligence is complete.

THROUGHOUT THE RELATIONSHIP

- ☐ The relationship and its transactions are monitored on an ongoing basis.
- ☐ A date is set for the next review, and the last review records what changed and what did not.
- ☐ Unusual transactions are reported to FIU-Nederland without delay.
- ☐ Staff are trained on their Wwft obligations, and the training is evidenced.

Failed ongoing monitoring is cited alongside inadequate client due diligence in every Wwft fine Dutch supervisors published in 2025 and 2026. It is the single most common finding.

AFTER THE RELATIONSHIP ENDS

- ☐ Everything above is kept for five years from the end of the business relationship or the transaction.
- ☐ It is held accessibly, so that the complete file can be produced quickly on request (Article 33 Wwft).
- ☐ It is destroyed when that period expires, and the destruction is itself recorded.

Keeping a file longer than the statutory period is a data-protection problem. Destroying it sooner is an anti-money-laundering one.

THE TEST

If your supervisor telephoned tomorrow and named three of your clients, could you produce each file complete, the same day, without asking a colleague to search their inbox?

This checklist is a summary for orientation and is not legal advice. Your firm remains the obliged entity and is responsible for its own compliance.
Reviewed against the Wwft as in force in September 2026.