

Actigy BPO KYC Checklist 2026

24 controls with evidence and decision records

Use this template to document a defined KYC review. Adapt it to the service entity, customer, product, jurisdiction, and approved policy. Completion of the checklist does not itself approve a customer.

Case setup

Case reference: _____ Review date: _____

Service entity and jurisdiction: _____

Customer category and product: _____

Review reason: onboarding / refresh / trigger / remediation

Policy version and compliance owner: _____

Reviewer and quality reviewer: _____

Approved evidence repository: _____

How to use the controls

For each control, enter the result, evidence reference, reviewer, and date. Store customer documents only in the approved system. Use a case reference here instead of copying identity numbers or document images.

Choose a status: Complete, Pending, Escalated, or Not applicable. Explain Not applicable. A blank, a pending item, and an unresolved match are not completed controls.

Link each exception to the log on the final page. Assign a next action, owner, and due date. Keep a separate record of any authorized policy exception.

The client's authorized reviewer records the customer decision. Reviewers should not infer acceptance from an empty decision field or a completed checklist.

Companion guide: [Actigy BPO Know Your Customer Checklist](#). Original operational template. Evidence checked 18 October 2026. Reuse with attribution. The guide contains the linked source context.

Controls 01 to 08

Case reference: _____ Policy version: _____

01 Identify the service entity and applicable jurisdiction

1 Set scope · Expected record: Policy scope reference

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

02 Classify customer, product, and review reason

1 Set scope · Expected record: Onboarding, refresh, trigger, or remediation record

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

03 Assign reviewer and record approved policy version

1 Set scope · Expected record: Owner and procedure version

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

04 Collect the identifying attributes required by policy

2 Verify identity · Expected record: Approved customer record reference

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

05 Run the approved identity verification method

2 Verify identity · Expected record: Source or tool, date, and result

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

06 Document and route identity inconsistencies

2 Verify identity · Expected record: Mismatch and resolution or escalation

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

07 Verify business existence where applicable

3 Establish ownership · Expected record: Registry or accepted existence evidence

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

08 Map relevant ownership and control under applicable rules

3 Establish ownership · Expected record: Ownership evidence and control assessment

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

Controls 09 to 16

Case reference: _____ Policy version: _____

09 Verify relevant people and authority to act

3 Establish ownership · Expected record: Identity and authorization references

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

10 Complete applicable sanctions and ownership checks

4 Review screening · Expected record: Screening timestamp, scope, and disposition

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

11 Apply the relevant PEP procedure

4 Review screening · Expected record: Assessment and required review record

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

12 Review relevant adverse information under policy

4 Review screening · Expected record: Source, relevance, and disposition

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

13 Document purpose and expected activity

5 Assess the relationship · Expected record: Customer explanation and profile

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

14 Apply approved risk factors and record rationale

5 Assess the relationship · Expected record: Risk assessment and policy reference

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

15 Complete additional due diligence when required

5 Assess the relationship · Expected record: Trigger, further evidence, and escalation

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

16 Check completeness and consistency of the evidence

6 Check the evidence · Expected record: Quality review record

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

Controls 17 to 24

Case reference: _____ Policy version: _____

17 Record an owner and next action for each exception

6 Check the evidence · Expected record: Exception log and due date

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

18 Confirm required independent review or QA is recorded

6 Check the evidence · Expected record: Reviewer, scope, date, and result

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

19 Confirm required controls and exceptions are resolved

7 Record the decision · Expected record: Final handoff status and restrictions

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

20 Capture the authorized customer decision separately

7 Record the decision · Expected record: Decision-maker, rationale, and date

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

21 Record conditions and permitted operational actions

7 Record the decision · Expected record: Approved action and communication record

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

22 Assign monitoring handoff and review triggers

8 Maintain the file · Expected record: Owner, next review, and event triggers

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

23 Set retention and deletion rules by record category

8 Maintain the file · Expected record: Approved schedule and applicable holds

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

24 Confirm access controls and evidence retrievability

8 Maintain the file · Expected record: Approved repository and access review

Status: _____ Evidence ref: _____ Reviewer/date: _____

Result / exception reference: _____

Exceptions and authorized decision

Case reference: _____

Exception log

Add rows as needed in the editable file. Reference sensitive evidence in the approved repository.

Control	Gap or question	Owner and action	Due date and closure
_____	_____ _____	_____ _____	_____ _____
_____	_____ _____	_____ _____	_____ _____
_____	_____ _____	_____ _____	_____ _____
_____	_____ _____	_____ _____	_____ _____

Quality review

Review scope and result: _____

Reviewer and date: _____

Unresolved items and restrictions: _____

Client decision

Decision: pending / accept / decline / other authorized disposition

Authorized decision-maker and role: _____

Decision date and rationale: _____

Conditions and next actions: _____

Next review date or trigger: _____

Monitoring owner: _____

Retention schedule and record location: _____

Confirm every applicable prerequisite and unresolved exception before recording an approval. Use the firm’s authorized process for restrictions, filings, and customer communication.