

AML/CFT Organogram Guidance

What is an organogram?

An organogram, also called an organizational chart, is a diagram of the entire:

1. ownership (both legal and beneficial ownership); and
2. management,

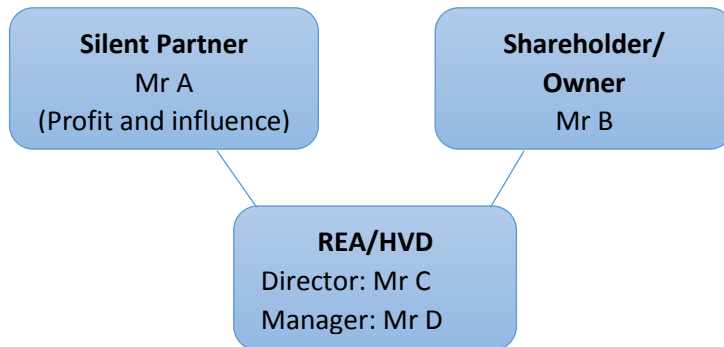
of a business. The organogram should therefore include all persons who are benefiting from the business and all persons that have a right to exercise influence or control over the business, e.g.:

- directors
- managers
- owners
- shareholders
- beneficial owners
- beneficiaries
- silent partners
- indirect owners

Organogram examples

Below are two organogram examples for a simple and a complex business structure. Every person identified (Mr A, Mr B, Mr C, Mr D etc.) would be regarded as an ultimate beneficial owner in accordance with section 7 of the Proceeds of Crime Act 2015.

Simple structure:



Complex structure:

