Client and Matter Risk Assessment

You must carry our client and matter risk assessments under Regulation 28(12) & (13) of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. If you choose to use this form, you should complete all sections and complete customer due diligence in line with the level of risk identified.

Client reference

Matter reference

**1.Client details**

Client name DoB

Address

New  Existing  Date due diligence was last updated

|  |
| --- |
|  |

Occupation/

Source of income

|  |
| --- |
| Choose an item. |

**For entities - Please complete section 2e.**

Entity type

**2. Initial risk assessment**

**2a. Client risk**

|  |  |
| --- | --- |
| Is it unusual for this type of client to instruct us? | Yes  No |
| Do you have any concerns about the client?  *e.g. capacity, undue influence, vulnerability* | Yes  No |
| If a third party is instructing, do we have evidence of their authority to act? | Yes  No |
| Do you have any concerns about this client, agent or third parties? | Yes  No |
| Is the client a designated person/entity? | Yes  No |

Provide details of any issues identified in this section

|  |
| --- |
| Click or tap here to enter text. |

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**2b. Jurisdiction risk**

Where is the client based?

|  |  |
| --- | --- |
| Do you have any concerns about the client’s location? | Yes  No |
| Does it make sense for the client to instruct us from this location? | Yes  No |
| Are there overseas elements? If **yes**, provide details below  *e.g. overseas beneficiary, contracts for overseas entities* | Yes  No |

Provide details of any issues identified in this section

|  |
| --- |
| Click or tap here to enter text. |

**2c. Delivery channel risk**

|  |  |
| --- | --- |
| Will we meet the client in person? | Yes  No |

If **no**, how are we satisfied that the client is who they say they are?

|  |
| --- |
| Click or tap here to enter text. |

**2d. Due diligence review**

What steps have you taken to verify the client or any instructing third party’s identity?

|  |
| --- |
| Click or tap here to enter text. |

|  |  |
| --- | --- |
| Is there any adverse media about the client or beneficial owners? | Yes  No |

**2e. For entities**

Provide details of beneficial owners, shareholders/controllers including percentages of shareholdings

|  |
| --- |
| Click or tap here to enter text. |

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Provide details of steps taken to identify and verify ultimate beneficial owners

|  |
| --- |
| Click or tap here to enter text. |

|  |  |
| --- | --- |
| Have you identified any reportable discrepancies? | Yes  No |
| If applicable, have you checked the register of overseas entities? | Yes  No |

**3. Matter risks**

Description of work and transaction value

|  |
| --- |
| Click or tap here to enter text. |

|  |  |
| --- | --- |
| Do we usually carry out this type of work? | Yes  No |
| Does the matter involve creating a complex structure? | Yes  No |
| Does it involve a cash-intensive industry? | Yes  No |
| Does it involve a high-risk industry? | Yes  No |
| Does the matter involve a risk of proliferation financing? | Yes  No |
| Are there any there any other AML or Counter Terrorist Financing risks? | Yes  No |
| Have you checked the source of funds for this transaction? | Yes  No |

If **yes**, provide a description of the source of funds. If **no**, provide an explanation below

|  |
| --- |
| Click or tap here to enter text. |

|  |  |
| --- | --- |
| Is the matter transactional? | Yes  No |
| If **no**, does the transaction arrange for the movement of funds or assets? | Yes  No |
| Are we receiving funds from overseas? | Yes  No |
| Are we receiving funds from third parties? | Yes  No |
| Will this matter be funded by digital assets? *e.g. Crypto* | Yes  No |
| Is this transaction consistent with your understanding of the client’s profile and  financial position? e.g. it makes sense for the client to instruct us on this transaction? | Yes  No |

|  |  |
| --- | --- |
|  |  |

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Provide details of any issues identified in this section

|  |
| --- |
| Click or tap here to enter text. |

**3a. Product/service risk**

|  |  |
| --- | --- |
| Based on the client’s profile, does it make sense for the client to instruct us  on this transaction? | Yes  No |

If **no**, provide details

|  |
| --- |
| Click or tap here to enter text. |

**3b. Enhanced due diligence**

*If ‘Yes’ applies to any of the following, contact the nominated person before proceeding. Provide details of the additional measures you will take to mitigate the risk identified below.*

|  |  |
| --- | --- |
| If the client is not an individual, is the structure complex or unusual? | Yes  No |
| Does the client own, manage or direct a business or activity that falls within  a higher risk sector? | Yes  No |
| Does the matter involve a client, a beneficial owner or other party linked to the  Transaction, manage or direct a business or activity that is cash intensive? | Yes  No |
| Does the matter involve a client, a beneficial owner or any party established in a high-risk third country or high-risk or jurisdiction? | Yes  No |
| Is the client, a beneficial owner or any party linked to the transaction a politically exposed person (PEP), family member or a close associate of a PEP? | Yes  No |
| Do you have any concerns that the client, a beneficial owner or any parties linked to the transaction is subject to financial sanctions or has links to a country subject to sanctions? | Yes  No |
| Will this matter involve a country subject to sanctions? | Yes  No |
| Is the transaction unusually complex or large? | Yes  No |
| Does this transaction form part of an unusual pattern of transactions? | Yes  No |
| Does the transaction lack an apparent economic or legal purpose? | Yes  No |
| Are there any other factors that could indicate a higher risk of money laundering or terrorist financing? | Yes  No |

If risks identified, date escalated to nominated person

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Provide details of any issues identified and measures to be taken

|  |
| --- |
| Click or tap here to enter text. |

**3c. Risk level and justification**

|  |
| --- |
| What level of risk is posed by the client? |
| Low  Medium  High |

|  |
| --- |
| What level of risk is posed by the matter? |
| Low  Medium  High |

*I have given these ratings because...*

|  |
| --- |
| Click or tap here to enter text. |

**For high-risk matters:**

|  |  |
| --- | --- |
| Have you obtained evidence of source of wealth? | Yes  No |
| Does the stated source of wealth/funds and the sum of money involved  correspond with what you know about the client? *e.g. age and occupation* | Yes  No |

*Explain why you are happy to proceed with the matter*

|  |
| --- |
| Click or tap here to enter text. |

**4. Due Diligence**

|  |
| --- |
| What level of customer due diligence will you apply? |
| Simplified  Standard  Enhanced |

*I have chosen to apply this level of CDD because...*

|  |
| --- |
| Click or tap here to enter text. |

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|  |  |  |  |
| --- | --- | --- | --- |
| Date |  | Signed |  |

**5. Ongoing Monitoring**

Date due diligence was conducted

|  |  |
| --- | --- |
| Has your due diligence changed your assessment of the level of risk? | Yes  No |

If **yes** to questions above, provide details and actions you will take to address any concerns

|  |
| --- |
| Click or tap here to enter text. |

What have you done to monitor any risks relating to the client and matter since your last review?

|  |
| --- |
| Click or tap here to enter text. |

|  |  |
| --- | --- |
| Has your assessment of the level of risk changed? | Yes  No |

If **yes**, provide your rationale

|  |
| --- |
| Click or tap here to enter text. |

|  |
| --- |
| **Updated risk level** |
| Low  Medium  High |

|  |  |  |  |
| --- | --- | --- | --- |
| Date |  | Signed |  |

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What have you done to monitor any risks relating to the client and matter since your last review?

|  |
| --- |
|  |

|  |  |
| --- | --- |
| Has your assessment of the level of risk changed? | Yes  No |

If **yes**, provide your rationale

|  |
| --- |
| - |

|  |
| --- |
| **Updated risk level** |
| Low  Medium  High |

|  |  |  |  |
| --- | --- | --- | --- |
| Date |  | Signed |  |

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