

MONEY LAUNDERING RISK ASSESSMENT FORM (MATTER-LEVEL)

The factors posed below should be considered when assessing the risk of the client and/or the transaction. Please use the notes column to summarise observations/assessment of risks involved where the issue is applicable to the client/transaction being considered. **Not all questions will be relevant or applicable to all situations. Conversely, the questions outlined are non-exhaustive– there may be other pertinent risk factors which should be taken into account, dependent upon the nature of the client/transaction being considered**

CLIENT RISK	NOTES	RISK SCORE		
		Initial	Interim	Final
<p>STATUS OF CLIENT</p> <ul style="list-style-type: none"> Is your client known to you personally/existing client, or new business relationship? Has your client been introduced to you by a 3rd Party? Is S.39 reliance being used? Is the instruction from your client channelled through a 3rd party? If so, why? Is your client a politically exposed person? If your client is not a natural person but rather a legal entity, do you have full visibility and ID&V of beneficial owners and directors / controllers? 				
<p>FACE TO FACE CONTACT</p> <ul style="list-style-type: none"> Have you met with your client face to face or is it a non-face to face transaction? If non-face to face, are you comfortable there is a legitimate reason for this, and that the client is not simply being evasive which may be a red flag? 				
<p>LOCATION OF CLIENT</p> <ul style="list-style-type: none"> Where is your client based? Locally /UK/EU/other international location? Are you aware of your client having any links to criminality? Is your client based in a high-risk jurisdiction where corruption is prevalent or resident in/links to a sanctioned country? 				
<p>ID & ADDRESS VERIFICATION</p> <ul style="list-style-type: none"> Has your client provided acceptable standard ID and address verification? Has your client provided <i>acceptable</i> non-standard ID and address verification? If using s.39 reliance (obtaining certified copies of ID & address verification), have you been able to confirm the authenticity/professional status of the certifier? Has your client been cooperative in the process or have they delayed providing ID and address verification / appeared reluctant to do so? 				

MONEY LAUNDERING RISK ASSESSMENT – FILE NOTE

This should be completed at the beginning of the transaction, during the transaction if anything changes and just before the transaction is completed. Assessment of risk should take both client and transaction risk into consideration and will dictate whether Standard or Enhanced Client Due Diligence (CDD) is required.

INITIAL ASSESSMENT OF RISK:	<i>LOW (Standard CDD)</i>	<i>MEDIUM (Standard CDD)</i>	<i>HIGH (Enhanced CDD)</i>
<i>Please note below reasons for your assessment:</i>			
<i>SIGNED BY: (Fee earner)</i>	<i>DATE:</i>		
<i>SIGNED BY: (Supervisor)</i>	<i>DATE:</i>		

INTERIM ASSESSMENT OF RISK:	<i>LOW (Standard CDD)</i>	<i>MEDIUM (Standard CDD)</i>	<i>HIGH (Enhanced CDD)</i>
<i>Please note below reasons for your assessment:</i>			
<i>SIGNED BY: (Fee earner)</i>	<i>DATE:</i>		
<i>SIGNED BY: (Supervisor)</i>	<i>DATE:</i>		

FINAL ASSESSMENT OF RISK:	<i>LOW (Standard CDD)</i>	<i>MEDIUM (Standard CDD)</i>	<i>HIGH (Enhanced CDD)</i>
<i>Please note below reasons for your assessment:</i>			
<i>SIGNED BY: (Fee earner)</i>	<i>DATE:</i>		
<i>SIGNED BY: (Supervisor)</i>	<i>DATE:</i>		

NB – If you have assessed the risk as high at any point during the transaction or have any reservations or concerns, please refer to the MLRO/MLCO before continuing to act for the client and clearly document any discussions on the file.