# SANCTIONS FIRM WIDE RISK ASSESSMENT

As required by the SRA and relevant sanctions legislation, this firm has taken appropriate steps to identify and assess the risks of breaches of the UK sanctions regime to which its business is subject.

The results of this risk assessment inform the measures we put in place to comply with the financial sanctions regime within the firm's Sanctions Policy.

Steps taken

The risk assessment was carried out by the firm's *MLRO/NOMINATED OFFICER*, namely Timothy Halliday on 23rd June 2026.

The steps taken in conducting the risk assessment included the following:

- checking the history of sanctions issues and compliance at the firm, including considering the results of file reviews over the previous two years, the firm's record of regulatory failures maintained by the COLP so far as they relate to sanctions issues.

- considering the risk factors identified by the SRA, the NCA Risk Assessment, OFSI publications and HM Treasury's National Risk Assessments.

- reflecting on his personal experience of the services, clients, systems and personnel of the firm;

- Consulting heads of offices, heads of departments and the firm's COLP and COFA about sanctions risk.

- reviewing the changes to sanctions legislation (November 2024), Sanctions (EU Exit) (Miscellaneous Amendments) (No.2) Regulations 2024 and the risks to which this firm is subject. **This was amended and came into force on May 13, 2026, which introduced new criminal offenses for exporting sanctioned goods at risk of diversion and made specific updates to licensing provisions across 36 UK sanctions regime**

- reviewing the packages of sanctions adopted by the EU since February 2022 in response to Russia's war of aggression against Ukraine up to and including the 15th Package of Sanctions Against Russia dated 16th December 2024.

- reviewing the US Sanctions updates up to and including Counter Terrorism Designations; Venezuela-related and Counter Narcotics Designation Removals; Publication of OFAC/OFSI Memorandum of Understanding dated 13th January 2025.

- Reviewing the OTSI guidance in respect of Trade, aircraft and shipping sanctions, civil enforcement & guidance on reporting a suspected breach of trade sanctions updated March 2025.

- **Reviewing the SRA Guidance on Complying with the Sanctions Regime (updated 19th June 2026). To help firms understand the UK Sanctions Regime, and the expectations for how to comply with it.**

- Reviewing the OFSI Sector Specific Threat Assessment Report – Legal Services (published June 2025). relating to UK financial sanctions compliance.

- Reviewing OFSI Annual Review 2024 to 2025:Effective Sanctions (published October 2025). This highlights a significant increase in frozen assets and a strategic shift towards proactive, intelligence-led enforcement

- Reviewing the OFSI guidance updated November 2025. This provides general advice on UK financial sanctions and is produced by the Office of Financial Sanctions Implementation (OFSI), part of HM Treasury, which is the authority for the implementation of financial sanctions in the UK.

- From 28 January 2026, the UK Sanctions List (UKSL) will be the only sanctions list which details sanctions designations published by the UK government. The OFSI Consolidated List and its search tool will no longer be updated from this date. All of the firm's PCP's will be amended prior to then and staff training will be implemented.

- **UK Government's strategic approach to sanctions enforcement Updated 8th May 2026.**

**Overview**

Overall, this firm is considered to be **low** risk compared to most law firms.

**Departments / practice areas**

The risk profile of the firm's *departments/practice areas* are assessed as follows (in declining order of assessed risk)

- *Residential conveyancing:*
- *Commercial property:*
- *Private client:*
- *Family:*
- *Employment:*

**Client groups**

*Detail whether the firm acts for individuals/entities which are more likely than others to be sanctioned – consider:*

- *Do many clients meet the definition of a Politically Exposed Person under the AML legislation?**No***

- *Are many clients established in or have significant links to a jurisdiction with a UK sanctions regime addressing it? **No***

- *Do many clients have a personal or professional relationship with a designated person including family members?**No***

- *Are many designated clients ultra-high net worth individuals (i.e. investable assets of $30 million or more)? – this is an aggravating risk factor when present alongside another high risk factor. **No***

- *Does the firm act for charities/other entities that offer a range of services across borders which are linked to higher risk jurisdictions? **No (only limited work for local charities ie RSPCA shop lease)***
- *Do any clients seek anonymity?**No***

**Geography**

During the normal course of business we only deal with clients residing in England and Wales.

**Internal risk factors**

This can include lack of knowledge by staff and lack of established procedures for sanctions checks, etc however we provide sanctions training and do regular file reviews to try to establish any gaps in procedure/knowledge.

**Review and updating**

This record reflects the firm's current risks. It will be reviewed *annually* or sooner in the event of major changes which are likely to affect the firm's risk of breaching the sanctions regime.

Mitigation

We have referred above to a number of the safeguards which we have in place to mitigate against specific risks. Moreover, the firm's Sanctions Policy and other associated documents set out how the firm seeks to reduce the likelihood of becoming breaching sanctions legislation.

**Independent audit function**

The firm has established an independent internal audit function to evaluate monitor and improve its sanctions policies, controls and procedures on an annual basis. The results and recommendations are reported to senior management and acted upon.

Conclusions from the Sanctions FWRA

*The conclusions are a matter of judgment and should reflect the nature of the firm's work and client base. Examples of areas to cover:*

- *Our key risk areas: Conveyancing*
- *Our strengths and vulnerabilities: Strengths - experienced employees, strong management team, established procedures, good communication channels. Vulnerabilities – ever changing landscape.*
- *The effectiveness of our current systems and controls: working effectively & reviewed on a regular basis*
- *Emerging risks of particular concern for the firm: No particular concerns*
- *Our priorities: To continue to be vigilant, provide training and keep our policies and procedures updated*

Follow-on actions

This risk assessment should be reviewed at least annually.

Signed..... Dated..... 24/6/26

Name ..... TIMOTHY HALLIDAY

Prepared by Timothy Halliday *MLRO, MLCO, NOMINATED OFFICER*

Date: 24/6/26

Next Review Date on or before June 2027.