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 withina higher risk sector?  | Yes [ ]  No [ ]  |
| Does the matter involve a client, a beneficial owner or other party linked to theTransaction, 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 involvedcorrespond 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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