{INCLUDETEXT "C:\\Users\\NeilB\\OneDrive - PRACCTICE LTD\\Documents\\OspreyGateway\\TemporaryFiles\\amlincludedoc.doc"}

Client and Matter Risk Assessment

Client reference	{ MERGEFIELD client_no }
Matter reference	{ MERGEFIELD matter_no }

1. Client details	
Client name	{ IF {MERGEFIELD LINKNAME_SURNAME_1 } = "{ MERGEFIELD LINKNAME_SURNAME_2 }" "{ MERGEFIELD LINKNAME_TITLE_1} { MERGEFIELD LINKNAME_INITIALS_1 } & { MERGEFIELD LINKNAME_TITLE_2 } { MERGEFIELD LINKNAME_INITIALS_2 } { MERGEFIELD LINKNAME_SURNAME_1}" "{ IF { MERGEFIELD LINKNAME_SURNAME_2 } = "" "{ MERGEFIELD LINKNAME_TITLE_1} { MERGEFIELD LINKNAME_INITIALS_1} { MERGEFIELD LINKNAME_SURNAME_1}" "{ MERGEFIELD LINKNAME_TITLE_1} { MERGEFIELD LINKNAME_INITIALS_1} { MERGEFIELD LINKNAME_SURNAME_1} & { MERGEFIELD LINKNAME_TITLE_2} { MERGEFIELD LINKNAME_INITIALS_2} { MERGEFIELD LINKNAME_SURNAME_2}" }" }
Client address	{ MERGEFIELD CALCULATION_ADDRESS }
Client new or existing	{ MERGEFIELD "AMLCLI_DET1_NEWEXISTCLI" }
Date due diligence last updated *if applicable*	{ MERGEFIELD "AMLCLI_DET1_DUEDILUPDATE" }
Occupation/source of income	{ MERGEFIELD "AMLCLI_DET1_OCC_INCOME" }
What I.D. documents received, expiry dates, certified and verified by	{ MERGEFIELD "AMLCLI_DET1_IDINFO" }

For entities complete section 2e	
Entity type	{ MERGEFIELD "AMLCLI_DET1_ENTITYTYPE" }

2. Initial risk assessment	
2a. Client risk	
Is it unusual for this type of client to instruct us?	{ MERGEFIELD "AMLCLI_DET1_UNUSUALCLIENT" }
Do you have any concerns about the client? *e.g. capacity, undue influence, vulnerability*	{ MERGEFIELD "AMLCLI_DET1_CLIENTCONCERNS" }
If an third party is instructing, do we have evidence of their authority to act?	{ MERGEFIELD "AMLCLI_DET1_INTERMEDIARYEV" }
Do you have any concerns about this client, agent or third parties?	{ MERGEFIELD AMLCLI_DET2_AGENT_CONCERN }

Is the client a designated person / entity?	{ MERGEFIELD "AMLCLI_DET1_DESIGNATEDPERS" }

Provide details of any concerns identified in this section
{ MERGEFIELD "AMLCLI_DET1_CLIRISKCONCERNS" }

2b. Jurisdiction risk

Where is the client based?	{ MERGEFIELD "AMLCLI_DET1_CLICOUNTRY" }
Do you have any concerns about the client's location?	{ MERGEFIELD "AMLCLI_DET1_LOCATIONCONCERN" }
Does it make sense for the client to instruct us from this location?	{ MERGEFIELD "AMLCLI_DET1_LOCATIONSENSE" }
Are there overseas elements? If **yes**, provide details below *e.g. overseas beneficiary, contracts for overseas entities*	{ MERGEFIELD "AMLCLI_DET1_OVERSEASELEM" }

Provide details of any concerns identified in this section.
{ MERGEFIELD "AMLCLI_DET1_JURSDCTONCONCRN" }

2c. Delivery channel risk

Will we meet the client in person?	{ MERGEFIELD "AMLCLI_DET1_CLIMEETPERSON" }
If no, how are we satisfied that the client is who they say they are?	
{ MERGEFIELD "AMLCLI_DET1_CLIENTISPERSON" }	

2d. Due diligence review

What steps have you taken to verify the identity of the client, Giftor or intermediary?	
{ MERGEFIELD "AMLCLI_DET1_STEPSVERIFYCLI" }	
Is there any adverse media about the client or beneficial owners.	{ MERGEFIELD "AMLCLI_DET1_ADVERSEMEDIA" }

2e. For entities

Provide details of beneficial owners, shareholders/controllers including percentages of shareholdings
{ MERGEFIELD "AMLCLI_DET2_BENEFOWNERS" }

Provide details of steps taken to identify and verify ultimate beneficial owners
{ MERGEFIELD AMLCLI_DET2_PROVE_BEN_OWN }

Have you identified any reportable discrepancies?	{ MERGEFIELD "AMLCLI_DET2_REPDISCREP" }
If applicable, have you checked the register of overseas entities?	{ MERGEFIELD "AMLCLI_DET2_CHCKOVERSEASREG" }

3. Matter risk
Description of work
{ MERGEFIELD "AMLMATRISK1_WORKDESCRIPTION" }

Do we usually carry out this type of work?	{ MERGEFIELD "AMLMATRISK1_USUALTYPEWORK" }
Does the matter involve creating a complex structure?	{ MERGEFIELD "AMLMATRISK1_COMPLEXSTRUCURE" }
Does it involve a cash-intensive industry?	{ MERGEFIELD "AMLMATRISK1_CASHINTENSIVE" }
Does it involve a high-risk industry?	{ MERGEFIELD "AMLMATRISK1_HIGHRSKINDUSTRY" }
Does the matter involve risk of proliferation financing?	{ MERGEFIELD "AMLMATRISK1_PROLIFERATION" }
Are there any other AML or Counter Terrorist Financing risks?	{ MERGEFIELD "AMLMATRISK1_AMLTERRORRISKS" }
Have you checked and obtained evidence of the source of wealth and source of funds for this transaction?	{ MERGEFIELD "AMLMATRISK1_WEALTHEVIDENCE" }

If yes, provide a description of the sources, if no provide an explanation (***this question must be answered***)
{ MERGEFIELD "AMLMATRISK1_EVIDENCEWEALTH" }

Is the matter transactional?	{ MERGEFIELD "AMLMATRISK1_TRANSMATTER" }
If **no**, does the transaction arrange for the movement of funds or assets?	{ MERGEFIELD "AMLMATRISK1_MOVEFUNDS" }
Are we receiving funds from overseas?	{ MERGEFIELD "AMLMATRISK1_OVERSEASFUNDS" }
Are we receiving funds from third parties?	{ MERGEFIELD "AMLMATRISK1_INTERMEDFUND" }
Will this matter be funded by digital assets? *e.g. Crypto*	{ MERGEFIELD AMLMATRISK1_DIGITAL_ASSETS }
Is this transaction consistent with your understanding of the client's profile and financial position?	{ MERGEFIELD "AMLMATRISK1_OKTRANSCLI" }

Provide details of any issues identified in this section
{ MERGEFIELD "AMLMATRISK1_MATRISKISSUE" }

3a. Product/service risk	
Based on the client's profile, does it make sense for the client to instruct us on this transaction?	{ MERGEFIELD "AMLMATRISK1_CLINORMALINST" }

If no, provide details
{ MERGEFIELD "AMLMATRISK1_NOTNORMALCLIINS" }

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?	{ MERGEFIELD "AMLMATRISK1_COMLEXCOMPSTRUC" }
Does the client own, manage or direct a business or	{ MERGEFIELD

activity that falls within a higher risk sector?	"AMLMATRISK2_HIGHRISKSECTOR" }
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?	{ MERGEFIELD "AMLMATRISK2_CASHBUS" }
Does the matter involve a client, a beneficial owner or any party established in a high-risk third country or high-risk or jurisdiction?	{ MERGEFIELD "AMLMATRISK2_HIGHRISKCOUNTRY" }
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?	{ MERGEFIELD "AMLMATRISK2_PEPCLI" }
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?	{ MERGEFIELD "AMLMATRISK2_FINSANCTIONSC" }
Will this matter involve a country subject to sanctions?	{ MERGEFIELD "AMLMATRISK2_COUNTRYSANCTION" }
Is the transaction unusually complex or large?	{ MERGEFIELD "AMLMATRISK2_ODDTRANSLRG" }
Does this transaction form part of an unusual pattern of transactions?	{ MERGEFIELD "AMLMATRISK2_UNUSUALPATTERN" }
Does the transaction lack an apparent economic or legal purpose?	{ MERGEFIELD "AMLMATRISK2_ODDPURPOSE" }
Are there any other factors that could indicate a higher risk of money laundering or terrorist financing?	{ MERGEFIELD "AMLMATRISK2_OTHERFACTORS" }

If risks identified, date escalated to nominated person	{ MERGEFIELD AMLMATRISK2_ESCALATE_RISK }

Provide details of any issues identified and measures to be taken
{ MERGEFIELD "AMLMATRISK2_EDDMEASURES" }

3c. Risk level	
What level of risk is posed by the client?	{ MERGEFIELD "AMLMATRISK2_CLIENTRISK1" }

What level of risk is posed by the matter?	{ MERGEFIELD "AMLMATRISK2_MATTERRISK1" }

I have given these ratings because
{ MERGEFIELD "AMLMATRISK2_MATTERATE1" }

3d. For high-risk matters (leave blank for low and medium risk levels):	
Have you obtained evidence of source of wealth?	{ MERGEFIELD "AMLMATRISK2_MLROTOLD" }
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*	{ MERGEFIELD "AMLMATRISK2_SUSPICIONS" }

Explain why you are proceeding with the matter
{ MERGEFIELD "AMLMATRISK2_EXPLAINPROCEED" }

4. Due diligence	
What level of customer due diligence will you apply?	{ MERGEFIELD "AMLMATRISK2_DUEDILTYPE" }

I have chosen to apply this level of CDD because
{ MERGEFIELD "AMLMATRISK2_CDDEXPLANATION" }

Signed	Dated