

CLIENT RISK ASSESSMENT: Anti money laundering

This list is not exhaustive and additional risk assessment points should be added according to the services provided to the client by the practice.

Initial Risk Assessment	
Client name	
Knowledge of your client	Response
Have we met the client face to face?	
Have we attended their home/place of work?	
Did the client provide all of the necessary client ID to carry out CDD?	
Was the client happy to comply with the due diligence process?	
Do we have details of the client's business activities, the client's purpose and the sector in which the client operates?	
Do we understand the structure of the client's business including beneficial owner and/or all related parties involved with the business?	
Is the client a Politically Exposed Person (PEP)	
Client's Finances	Response
Do we understand the key source of the client's income and financing?	
Does the client have a high turnover in cash?	
Is the source of any significant funds held by the client unclear?	
Is the income of the client – when compared against their business activity – appropriate?	
Are there any unexplained receipts or payments?	
Are there any other factors that suggest the client represents a higher than normal risk of money laundering?	
Have any statements been made to this firm which indicate undisclosed income, either by client or outside parties?	

Is the client's lifestyle appropriate to the income in the accounts?	
Date of initial risk assessment carried out	
Name of assessor	
Risk – The client is considered to be Delete as appropriate	High risk Medium risk Low risk

Annual Review	Response
Have we checked and updated the client's ID?	
Has the client's business activity changed significantly from the last review?	
Upon reviewing all of the questions in the initial risk assessment were any of the responses different?	
If yes, what changes have taken place?	
Date of risk assessment review was carried out	
Name of assessor	
Risk – The client is now considered to be Delete as appropriate	High risk Medium risk Low risk