

AML/CFT RISK ASSESSMENT QUESTIONNAIRE

Name of Firm	
Type (Partnership, LLP, limited company, registered Business Name, etc.)	
Date Submitted	
Number of Practitioners (Barristers or Solicitors)	
Number of Legal Executives	
Number of law draftsmen	
Number of Other Staff (Note 1)	

Does the firm:					
(i) assist in the planning or execution of transactions for their client concerning the-	buying and selling of real property or business entities		managing of client money, securities or other asset		opening or management of bank, savings or securities accounts

organisations of contributions necessary for the creation, operation or management of companies		creation, operation or management of trusts, companies, foundations, or similar structures	
---	--	--	--

(ii) by acting on behalf of and for their client in any financial or real estate transaction	
--	--

Does the law firm have an associated FSC-licensed Professional Trustee or Company Manager?	
--	--

If so, name of entity:	
------------------------	--

If the law firm has such an associated firm, do you combine compliance (AML/CFT) resources such as compliance staff or systems?	
---	--

Does the firm accept any cash payments?	
---	--

If 'yes' what approximate percentage of payments are received in cash?	
--	--

Does the firm maintain a record of cash payments received?	
--	--

If yes, does the record include a rationale for accepting such payments?	
--	--

Does the firm act on behalf of a client or carry out a one-off transaction before completion of CDD?	
--	--

If so, does the firm maintain a record of the rationale for having done so?	
---	--

Have employees received any anti-money laundering training? (<i>Note 2</i>)	
---	--

If yes, please provide details:	
---------------------------------	--

Does the firm have a MLRO and notified GFIU?	
--	--

Have all members of the firm been made aware of the Guidance notes for the Legal Profession on AML/CFT issued on 01/11/2017?	
--	--

Are there procedures and policies in place to detect and report suspected money laundering?	
---	--

If yes, please provide details:	
---------------------------------	--

Has the business ever submitted a SAR?	
--	--

Has the firm analysed or assessed the business's vulnerability to money laundering?	
---	--

Does the firm(at least initially) deal with its client in person?	
---	--

If not, what percentage of clients does not or has it not met in person?	
--	--

Does the firm accept clients introduced by eligible or non-eligible introducers?	
--	--

If 'yes', please indicate the split between eligible and non-eligible introducers	
---	--

Has the firm risk-profiled all its clients?	
---	--

If 'No', what percentage of clients have not been risk-profiled?	
Number of customers declined due to concerns of ML/TF or other financial crime (since end of January 2016)	
Number of internal reports submitted to the MLRO (since end of January 2016)	
Number of SARs submitted by the MLRO to the GFIU (since end of January 2016)	
Does the firm outsource any of its AML /CFT systems of controls to a third party?	
If yes, please provide details, including full name and address of firm.	

Notes:

¹ *Other staff in a law firm who are involved in anti-money laundering and terrorist financing compliance.*

² *To include members of the firm such as associates, who may be self-employed*