

Risk Assessment Questionnaire - Notes for Completion

Please complete and submit this return electronically via email to albert.yome@gcs.gov.gi.

If you have any queries please email the Legal Profession Supervision Officer at that address or telephone 20050869.

If you are unable to provide a complete reply on the return itself, please attach make reference to this in the return and include as attached word-processed / scanned documents.

Glossary

Customer(s) - Customer refers to a person or legal arrangement with whom the firm / practitioner has established a business relationship, or on behalf of whom the firm / practitioner has carried out an occasional transaction.

Eligible Introducers - an introducer of business that meets the criteria as set out in R48 of the GFSC AML/CFT Guidance Notes <http://www.fsc.gi/uploads/AMLCFT%20GN%20v2.0.pdf> .

Please refer to 4.3.4 Reliance and outsourcing of the Anti-Money Laundering and Combatting Terrorist Financing Guidance Notes - Legal Professions.

SAR - Suspicious Activity Report submitted to GFIU.

Money Laundering Reporting Officer (MLRO) or Appropriate Person - Section 26(2)(d)(i) POCA requires that all firms within the regulated sector must have an "appropriate person" (better known as the Money Laundering Reporting Officer or MLRO) to receive disclosures under section 28 POCA, and to make disclosures to the GFIU.

Section 26(3) POCA provides that there is no requirement to have an appropriate person in a relevant financial business if you are an individual who operates in a relevant financial business but does not employ any people or act in association with anyone else.

GFIU - Gibraltar Financial Intelligence Unit.

Guidance Notes – The Anti-Money Laundering and Combatting Terrorist Financing Guidance Notes - Legal Professions, first issued on 01/11/2017 and hosted on the GCS website at <http://www.gcs.gov.gi/index.php/aml-cft>

PEP - a politically exposed person. Please see 4.9.2 of the Guidance Notes.

Proceeds of Crime Act 2015 - <http://www.gibraltarlaws.gov.gi/articles/2015-22o.pdf>

If you did not attend the presentations on the Guidance Notes and MONEYVAL, you can access these at <http://www.gcs.gov.gi/index.php/aml-cft>