Osprey Approach: Risk Management

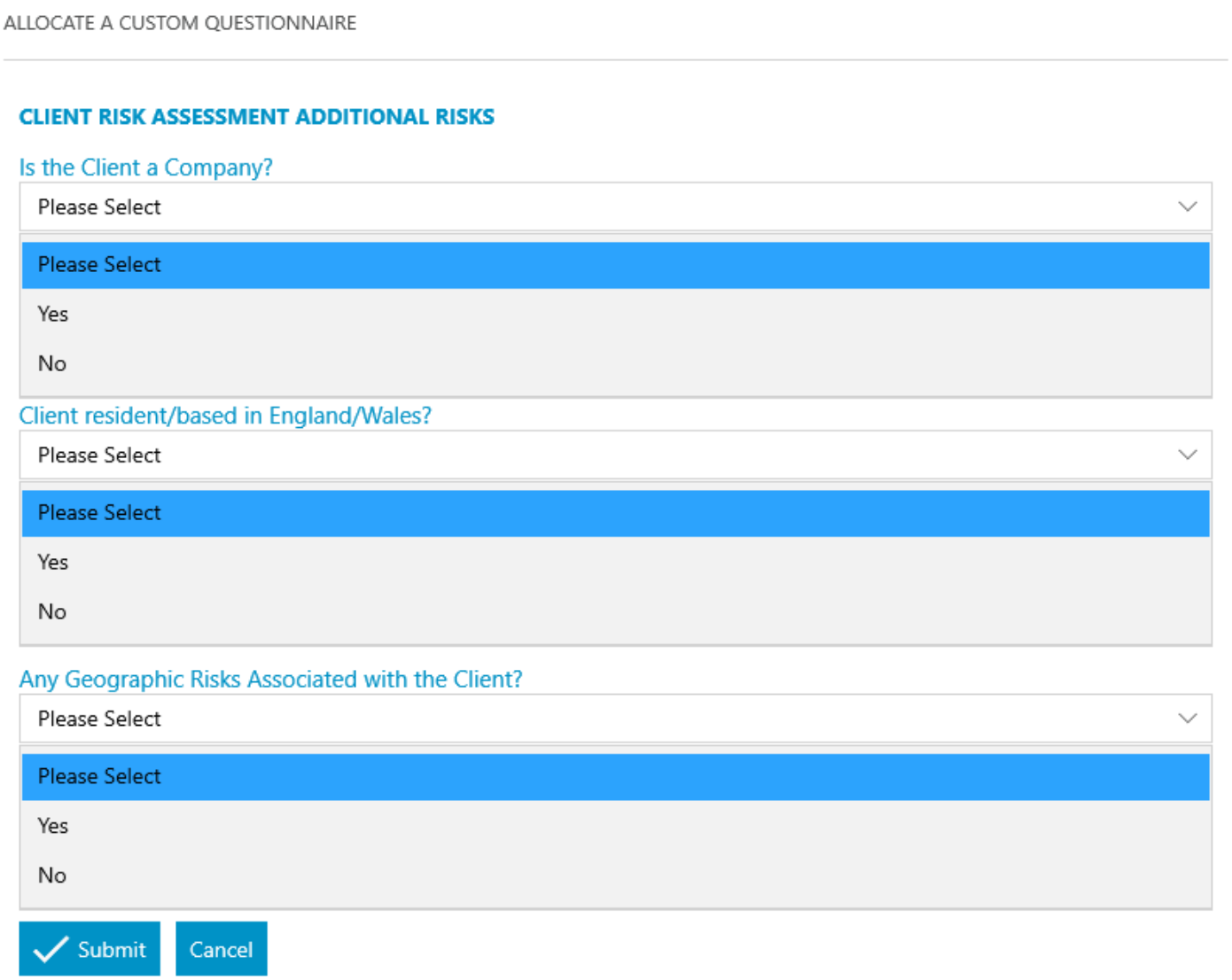
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Osprey™ Approach

Designed to be imported as extra tasks into existing work types. Covers ID Formalities and Client Due Diligence. Record client ID and complete your client and matter risk assessments as well as source of funds assessment within Osprey. Covers Individual clients as well as companies and beneficial owners. Client risk assessments are recorded at client level and will be available on any matter for that client ensuring that previous risk assessments are available. You can indicate if a client is a PEP and key dates allow you to ensure that ID expiry dates are never missed. A selection or reports allow you MLRO and COLP to ensure that expired ID and high-risk matters are monitored effectively.



CLIENT 1 ADDITIONAL INFORMATION

Client 1 Title

Client 1 Initial

Client 1 Forename

Client 1 Middle Name

Client 1 Surname

Client 1 Address

Client 1 date of birth

Select a date

Client 1 gender

Please select

- Please select
- Male
- Female

Client 1 NI number

Client 1 Occupation

Client 1 - Is a Politically Exposed Person

Please Select

- Please Select
- Yes
- No

Client 1 - Sanctions List Checked?

Please Select

CLIENT COMPANY VERIFICATION

Client - Company Registration Number

Client - Company Date of Incorporation

Select a date

Client - Company Registered Address

Client - Company Form of Verification 1

Please Select

- Please Select
- Certificate of Incorporation
- Memorandum and Articles of Association
- List of Directors
- List of Shareholders (more than 25%)
- Last Filed Accounts
- Other - Please Detail on Verification Form

Client - Company Form of Verification 2

Please Select

- Please Select
- Certificate of Incorporation
- Memorandum and Articles of Association
- List of Directors
- List of Shareholders (more than 25%)
- Last Filed Accounts
- Other - Please Detail on Verification Form

Company - Electronic Verification of ID Completed?

Please Select

- Please Select
- Yes
- No

Please detail below who is instructing on behalf of the client company

Client - Company Representative

Client - Company Representative Status

ALLOCATE A CUSTOM QUESTIONNAIRE

CLIENT RISK ASSESSMENT - BENEFICIAL OWNER

You must take measures on a risk sensitive basis to identify and verify if the client is owned or controlled by someone else

Are there any Beneficial Owners?

Please Select

- Please Select
- Yes
- No

Submit Cancel

ALLOCATE A CUSTOM QUESTIONNAIRE

CLIENT RISK ASSESSMENT - BENEFICIAL OWNER RISKS

Has the structure, complexity or nature of the client entity or relationship made it difficult to identify the true beneficial owner or any controlling interests?

Difficult to Identify the True Beneficial Owner

Please Select

- Please Select
- Yes
- No

Submit Cancel

CLIENT 2 ADDITIONAL INFORMATION

Client 2 Title

Client 2 Initial

Client 2 Forename

Client 2 Middle Name

Client 2 Surname

Client 2 Address

Client 2 date of birth

Select a date

Client 2 gender

Please select

- Please select
- Male
- Female

Client 2 NI number

Client 2 Occupation

Client 2 - Is a Politically Exposed Person

Please Select

- Please Select
- Yes
- No

Client 2 - Sanctions List Checked?

Please Select

ALLOCATE A CUSTOM QUESTIONNAIRE

CLIENT RISK ASSESSMENT

Based on your CDD investigations, please select the appropriate client risk rating

Client Risk

Please Select

- Please Select
- Low Risk
- Standard Risk
- High Risk

Submit Cancel

CLIENT 1 ID FORMALITIES

Client 1 - Present for Identification?

Please Select

- Please Select
- Yes
- No

Client 1 - 2 Forms of ID Obtained?

Please Select

- Please Select
- Yes
- No

Client 1 - Electronic Verification of ID Completed

Please Select

- Please Select
- Yes
- No

Client 1 - Form of ID 1

Please Select

- Please Select
- Current Passport
- Current Photocard Driving Licence
- Utility Bill (Less than 3 months Old)
- Bank Statement (Less than 3 months Old)
- Mortgage Statement (Less than 3 months Old)
- Council Tax Bill (Current Year)
- Birth Certificate
- Marriage Certificate
- Current Government-Issued Identity Card
- Residence Permit Issued by the Home Office
- Entry on the Electoral Roll
- Other

Client 1 - Form of ID 1 Expiry

Select a date

Client 1 - Form of ID 2

Please Select

- Please Select

MATTER RISK ASSESSMENT INSTRUCTIONS

Nature and Purpose of Instructions

Submit Cancel

MATTER RISK ASSESSMENT ADDITIONAL RISKS

Unusually Complex Matter

Please Select

- Please Select
- Yes
- No

Unusually Large Matter

Please Select

- Please Select
- Yes
- No

Unusual Pattern of Transactions

Please Select

- Please Select
- Yes
- No

No Apparent Economic or Legal Purpose

Please Select

- Please Select
- Yes
- No

Property/assets in England/Wales

Please Select

- Please Select
- Yes
- No

Is value of case likely to exceed PI max?

Please Select

- Please Select
- Yes
- No

Submit Cancel

ALLOCATE A CUSTOM QUESTIONNAIRE

MATTER RISK ASSESSMENT

Please select matter risk

Matter Risk

Please Select

- Please Select
- Low Risk
- Standard Risk
- High Risk

Submit Cancel

ALLOCATE A CUSTOM QUESTIONNAIRE

LEVEL OF DUE DILIGENCE

Please select the most appropriate level of Due Diligence

Low Risk – simplified due diligence measures can be applied taking account of the risk factors in regulation 37 of the MLR 2017, for example, when the client is a bank, publicly listed company or public body

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Standard Risk – When the client is a private company or an individual

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High Risk – Enhanced due diligence (EDD) measures will need to be applied in certain circumstances, for example when the client is in a high-risk third country, is a politically exposed person (PEP) or the transaction is complex or unusually large and has no apparent economic or legal purpose

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Level of Due Diligence

Please Select

- Please Select
- Simplified Due Diligence
- Standard Due Diligence
- Enhanced Due Diligence

Submit Cancel

Questionnaire

Please fill in the Questionnaire below:

Please enter the amounts of each source of the funds being used in this transaction

Savings

Gift

Inheritance

Proceeds of Sale of Existing Property

Private Loan from Family/Friend

Loan or Mortgage from Bank or Building Soc

Proceeds of Sale of Investments

Other Sources

Other Sources Details

If any funds are being gifted, please give details of the person(s) who has/have made the gift

Funds Contain Gift

Please Select

Please Select
Yes
No

Name of person(s) Gifting funds

Relationship of person(s) Gifting funds

Next Cancel

Address of person(s) Gifting funds

Previous Submit Cancel

SOURCE OF WEALTH AND FUNDS

Please confirm that you have ascertained the source of the clients wealth. This refers to the origin of a client's entire body of wealth

Ascertained Source of Wealth

Please Select

- Please Select
- Yes
- No

Please confirm that you have ascertained the source of the clients funds that will be used in this matter

Ascertained Source of Funds

Please Select

- Please Select
- Yes
- No

Do the funds to be used in this matter contain any monies that have been gifted to the client?

Funds Contain Gift

Please Select

- Please Select
- Yes
- No

Please confirm that you have obtained evidence of the source of funds

Source of Funds Evidence Obtained

Please Select

- Please Select
- Yes
- No

Submit Cancel

SOURCE OF FUNDS

Please enter the amounts of each source of the funds being used in this transaction

Savings

0.00

Gift

0.00

Inheritance

0.00

Proceeds of Sale of Existing Property

0.00

Private Loan from Family/Friend

0.00

Loan or Mortgage from Bank or Building Soc

0.00

Proceeds of Sale of Investments

0.00

Other Sources

0.00

Other Sources Details

Submit Cancel

SOURCE OF FUNDS GIFT DETAILS

Name of person(s) Gifting funds

Relationship of person(s) Gifting funds

Address of person(s) Gifting funds

Submit Cancel

Client Due Diligence Risk

Assessment Form

Client Due Diligence Risk Assessment Form

Matter:	{ MERGEFIELD client_no }\{ MERGEFIELD matter_no }
Fee Earner:	{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } <> "Yes" "

Client 1 Full Name:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_TITLE \f" " }{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" " }{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_MNAME" \f" " }{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_SNAME" }
Client 1 Date of Birth:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_DOB }
Client 1 NI Number:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_NI }
Client 1 Full Address:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_ADD }
Client 1 is a PEP:	{ MERGEFIELD CLI1_ADD_INFO_CLI1_PEP }
Sanctions List Checked:	{ MERGEFIELD CLI1_ADD_INFO_CLI1_SANCTIONS }

For additional clients please see separate sheet" }{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } = "Yes" "

Client Company Entity Full Name:	{ MERGEFIELD "LINKNAME_SURNAME_1" }
Company Registration Number:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG }
Company Full Registered Address:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG_ADD }

For detailed company/entity CDD please see Company CDD Verification Form" }

Risk Assessment

Client Risk Assessed as:
Reasons for your assessment:
{ IF { MERGEFIELD CL_CDD_CDD_CL_ENG_WAL } = "No" "Client is outside of the UK/Wales." "Client is based in the UK/Wales" } { IF { MERGEFIELD CL_CDD_CDD_CL_GEO_RISK } = "Yes" "There are the following Geographic risks associated with the client:" "There are no Geographic risks associated with the client."} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "One or more client is a PEP - **You may not accept a PEP as a client without approval from the firm's MLRO**: " ""} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_TITLE" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_MNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_SNAME" } { MERGEFIELD CLI1_ADD_INFO_FW_CLI1_DOB }" ""} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "{ MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_TITLE" \f" "}{ MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_FNAME" \f" "}{ MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_MNAME" \f" "}{ MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_SNAME" } { MERGEFIELD CLI2_ADD_INFO_FW_CLI2_DOB }" ""} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "{ MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_TITLE" \f" "}{ MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_FNAME" \f" "}{ MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_MNAME" \f" "}{ MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_SNAME" } { MERGEFIELD CLI3_ADD_INFO_FW_CLI3_DOB }" ""} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "{ MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_TITLE" \f" "}{ MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_FNAME" \f" "}{ MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_MNAME" \f" "}{ MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_SNAME" } { MERGEFIELD CLI4_ADD_INFO_FW_CLI4_DOB }" ""} { IF { MERGEFIELD fssm_PEP_PRES } = "Yes" "{ MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_TITLE" \f" "}{ MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_FNAME" \f" "}{ MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_MNAME" \f" "}{ MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_SNAME" } { MERGEFIELD CLI5_ADD_INFO_FW_CLI5_DOB }" ""}

Fee Earners Signature:	Date:
Supervisors Signature (If Needed):	Date:

{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } <> "Yes" "

Additional Clients{ IF **{** MERGEFIELD CLI2_ADD_INFO_FW_CLI2_SNAME **}** <> "" "

Client 2 Full Name:	**{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_TITLE" \f" " **}{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_FNAME" \f" " **}{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_MNAME" \f" " **}{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_SNAME" **}**
Client 2 Date of Birth:	**{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_DOB" **}**
Client 2 NI Number:	**{** MERGEFIELD "CLI2_ADD_INFO_FW_CLI2_NI" **}**
Client 2 Full Address:	**{** MERGEFIELD CLI2_ADD_INFO_FW_CLI2_ADD **}**
Client 2 is a PEP:	**{** MERGEFIELD CLI2_ADD_INFO_CLI2_PEP **}**
Sanctions List Checked:	**{** MERGEFIELD CLI2_ADD_INFO_CLI2_SANCTIONS **}**

" "" **}{**IF **{** MERGEFIELD CLI3_ADD_INFO_FW_CLI3_SNAME **}** <> "" "

Client 3 Full Name:	**{** MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_TITLE" \f" " **}{** MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_FNAME" \f" " **}{** MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_MNAME" \f" " **}{** MERGEFIELD "CLI3_ADD_INFO_FW_CLI3_SNAME" **}**
Client 3 Date of Birth:	**{** MERGEFIELD CLI3_ADD_INFO_FW_CLI3_DOB **}**
Client 3 NI Number:	**{** MERGEFIELD CLI3_ADD_INFO_FW_CLI3_NI **}**
Client 3 Full Address:	**{** MERGEFIELD CLI3_ADD_INFO_FW_CLI3_ADD **}**
Client 3 is a PEP:	**{** MERGEFIELD CLI3_ADD_INFO_CLI3_PEP **}**
Sanctions List Checked:	**{** MERGEFIELD CLI3_ADD_INFO_CLI3_SANCTIONS **}**

" "" **}{**IF **{** MERGEFIELD CLI4_ADD_INFO_FW_CLI4_SNAME **}** <> "" "

Client 4 Full Name:	**{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_TITLE" \f" " **}{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_FNAME" \f" " **}{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_MNAME" \f" " **}{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_SNAME" **}**
Client 4 Date of Birth:	**{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_DOB" **}**
Client 4 NI Number:	**{** MERGEFIELD "CLI4_ADD_INFO_FW_CLI4_NI" **}**
Client 4 Full Address:	**{** MERGEFIELD CLI4_ADD_INFO_FW_CLI4_ADD **}**
Client 4 is a PEP:	**{** MERGEFIELD "CLI4_ADD_INFO_CLI4_PEP" **}**
Sanctions List Checked:	**{** MERGEFIELD "CLI4_ADD_INFO_CLI4_SANCTIONS" **}**

" "" **}{** IF **{** MERGEFIELD CLI5_ADD_INFO_FW_CLI5_SNAME **}** <> "" "

Client 5 Full Name:	**{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_TITLE" \f" " **}{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_FNAME" \f" " **}{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_MNAME" \f" " **}{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_SNAME" **}**
Client 5 Date of Birth:	**{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_DOB" **}**
Client 5 NI Number:	**{** MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_NI" **}**
Client 5 Full Address:	**{** MERGEFIELD CLI5_ADD_INFO_FW_CLI5_ADD **}**
Client 5 is a PEP:	**{** MERGEFIELD "CLI5_ADD_INFO_CLI5_PEP" **}**
Sanctions List Checked:	**{** MERGEFIELD "CLI5_ADD_INFO_CLI5_SANCTIONS" **}**

" "" **}**

" ""}

Client Verification Form

Client Verification Form

Matter:	{ MERGEFIELD "client_no" }\{ MERGEFIELD "matter_no" }
Fee Earner:	{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

Client 1 Full Name:	{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_TITLE" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_MNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_SNAME" }
Client 1 Date of Birth:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_DOB }
Client 1 NI Number:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_NI }
Client 1 Full Address:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_ADD }
Client 1 is a PEP:	{ MERGEFIELD CLI1_ADD_INFO_CLI1_PEP }
Sanctions List Checked:	{ MERGEFIELD CLI1_ADD_INFO_CLI1_SANCTIONS }

For additional clients please see separate sheet(s)

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_PRESENT } = "No" "I have been unable to meet the client face to face and have taken the following risk-based approach to verify the client's identity:" "I have met the client face to face and have taken the following risk-based approach to verify the client's identity:" \f "
"}

I have obtained { If { MERGEFIELD CLI1_ID_CLI1_ID_ELEC } = "Yes" "and electronically verified " "" }the following ID and attach copies{ IF { MERGEFIELD CLI1_ID_CLI1_ID_ELEC } = "No" ". I have not electronically verified the ID" "" }:

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_1 } <> "Please Select" "{ MERGEFIELD CLI1_ID_CLI1_ID_1 } - Expiry: { MERGEFIELD CLI1_ID_CLI1_ID_1_EXP }" "" }
{ IF { MERGEFIELD CLI1_ID_CLI1_ID_2 } <> "Please Select" "{ MERGEFIELD CLI1_ID_CLI1_ID_2 } - Expiry: { MERGEFIELD CLI1_ID_CLI1_ID_2_EXP }" "" }
{ IF { MERGEFIELD CLI1_ID_CLI1_ID_3 } <> "Please Select" "{ MERGEFIELD CLI1_ID_CLI1_ID_3 } - Expiry: { MERGEFIELD CLI1_ID_CLI1_ID_3_EXP }" "" }

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_2FORMS } = "No" "I have been unable to obtain at least 2 forms of ID because " " " \f "
" }

Fee Earners Signature:	Date:
Supervisors Signature (If Needed):	Date:

Company CDD Verification Form

Company CDD Verification Form

Matter:	{ MERGEFIELD client_no }\{ MERGEFIELD matter_no }
Fee Earner:	{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

Client Company Entity Full Name:	{ MERGEFIELD LINKNAME_SURNAME_1 }
Company Registration Number:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG }
Company Date of Incorporation:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_DATE_INC }
Company Full Registered Address:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG_ADD }
Company Representative:	{ MERGEFIELD CL_CDD_CDD_CO_REP }
Company Representative Status:	{ MERGEFIELD CL_CDD_CDD_CO_REP_STAT }
Confirmed Representative Authorised to Instruct:	{ MERGEFIELD CL_CDD_CDD_CO_REP_AUTH }

Description of the structure of the company/entity and nature of beneficial ownership:

Beneficial Owners:
{ MERGEFIELD fssm_CDD_BEN_OWN2 }
{ MERGEFIELD fssm_CDD_BEN_OWN3 \f" "}
{ MERGEFIELD fssm_CDD_BEN_OWN4 \f" "}
{ MERGEFIELD fssm_CDD_BEN_OWN5 \f" "}

I have taken the following risk-based measures to verify the above company/entities identity:

I have obtained the following documents to verify the company's identity:
{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_ID1 \f" "}
{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_ID2 \f" "}

{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_ID_ELEC } = "Yes" " I have electronically verified the company/entity." "I have not electronically verified the company/entity."}

Fee Earners Signature:	Date:
Supervisors Signature (If Needed):	Date:

Matter Due Diligence Risk

Assessment Form

Matter Due Diligence Risk Assessment Form

Matter:	{ MERGEFIELD client_no }\{ MERGEFIELD matter_no }
Fee Earner:	{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } <> "Yes" "

Client 1 Full Name:	{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_TITLE" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_MNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_SNAME" }

For additional clients please see Client CDD Risk Assessment and Client CDD Verification Form(s)" "" }{ IF{ MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } = "Yes" "

Client Company Entity Full Name:	{ MERGEFIELD LINKNAME_SURNAME_1 }

For detailed company/entity CDD please see Company CDD Verification Form " ""}

Nature and Purpose of Instructions

{ MERGEFIELD MAT_CDD_CDD_NAT_PUR_INS }

Risk Assessment

Matter Risk Assessed as: { MERGEFIELD MAT_CDD_CDD_MAT_RISK }

Reasons for your assessment:

{ IF { MERGEFIELD MAT_CDD_CDD_UN_COMP } = "Yes" "Please explain why this matter is unusually complex:
" ""}{ IF { MERGEFIELD MAT_CDD_CDD_UN_LARGE } = "Yes" "Please explain why this matter is unusually large:
" ""}{ IF { MERGEFIELD MAT_CDD_CDD_UN_PAT } = "Yes" "Please explain the unusual pattern of transactions:
" ""}{ IF { MERGEFIELD MAT_CDD_CDD_ECO_LEG_PUR } = "Yes" "Please explain why there is no apparent economic or legal purpose to this matter:
" ""}{ IF { MERGEFIELD MAT_CDD_CDD_ASS_ENG_WAL } = "No" "Please describe the Property or assets which are not situated in England or Wales:
" ""}{ IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the maximum professional indemnity cover: " ""}

Level of Due Diligence: { MERGEFIELD MAT_CDD_CDD_LEVEL_CDD }

Fee Earners Signature:	Date:
Supervisors Signature (If Needed):	Date:

Source of Funds Assessment

Source of Funds Assessment

Matter:	{ MERGEFIELD client_no }\{ MERGEFIELD matter_no }
Fee Earner:	{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } <> "Yes" "

Client 1 Full Name:	{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_TITLE" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_MNAME" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_SNAME" }
Client 1 Full Address:	{ MERGEFIELD CLI1_ADD_INFO_FW_CLI1_ADD }

For additional clients please see separate sheet" "" }{ IF { MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } = "Yes" "

Client Company Entity Full Name:	{ MERGEFIELD LINKNAME_SURNAME_1 }
Company Registration Number:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG }
Company Full Registered Address:	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG_ADD }

For detailed company/entity CDD please see Company CDD Verification Form" "" }

Source of Wealth:

{ If { MERGEFIELD CL_SOW_SOF_CDD_SOW_ENQ } = "Yes" "Please detail the source of wealth." "Please explain why you have been unable to acertain the source of wealth"}

Source of Funds:

{ IF { MERGEFIELD CL_SOW_SOF_CDD_SOF_ENQ } = "Yes" "

Please detail the source of funds including:

- the amount or value and type of financial instruments or assets funding the matter, including the activities that generate the funds
- method of transfer
- remitting party
- country from where the fund transfer(s) originated

Savings	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_SAV }
Gift	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_GIFT }
Inheritance	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_INH }
Proceeds of Sale of Existing Property	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_SALEPRO }
Private Loan from Family/Friend	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_PLOAN }
Loan or Mortgage from Bank or Building Soc	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_BLOAN }
Proceeds of Sale of Investments	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_SALEINV }
Other Sources	£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_OTHER }
Other Sources Details	{ MERGEFIELD CL_SOW_SOF_CDD_SOF_OTR_DET }
Total for Source of Funds	£{ MERGEFIELD fssm_CDD_SOF_TOTAL }

" "Please explain why you have been unable to acertian the source of funds"**}**

{ IF **{** MERGEFIELD CL_SOW_SOF_CDD_SOF_CGIFT **}** = "Yes" "The source of funds contains a gift. I have obtained the following details of the person providing the gift:

Name of Person(s) providing gift: **{** MERGEFIELD CL_SOW_SOF_CDD_SOF_G_NAME **}**
Relationship of person(s) providing gift: **{** MERGEFIELD CL_SOW_SOF_CDD_SOF_G_REL **}**
Address of Person(s) providing gift: **{** MERGEFIELD CL_SOW_SOF_CDD_SOF_ADD **}**" ""**}**

Fee Earners Signature:	Date:

Email to MLRO seeking

permission to proceed with PEP

client

Subject | PEP Client – Permission to Act {MATTER$CLIENT_NO}\{MATTER$MATTER_NO}

MESSAGE BODY

