

## 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 <i>if applicable</i>	{ 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" }
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### 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? <i>e.g. capacity, undue influence, vulnerability</i>	{ 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" }
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Provide details of any concerns identified in this section
{ MERGEFIELD "AMLCLI_DET1_CLIRISKCONCERNS" }

<b>2b. Jurisdiction risk</b>	
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 <b>yes</b> , provide details below  <i>e.g. overseas beneficiary, contracts for overseas entities</i>	{ MERGEFIELD "AMLCLI_DET1_OVERSEASELEM" }

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

<b>2c. Delivery channel risk</b>	
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" }	

<b>2d. Due diligence review</b>	
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" }

<b>2e. For entities</b>	
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_CHKCOVERSEASREG" }

<b>3. Matter risk</b>	
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 <b>no</b> , 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? <i>e.g. Crypto</i>	{ 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 }
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Provide details of any issues identified and measures to be taken
{ MERGEFIELD "AMLMATRISK2_EDDMEASURES" }

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

What level of risk is posed by the matter?	{ MERGEFIELD "AMLMATRISK2_MATTERRISK1" }
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I have given these ratings because
{ MERGEFIELD "AMLMATRISK2_MATTERATE1" }

<b>3d. For high-risk matters</b> (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?  <i>e.g. age and occupation</i>	{ 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