Osprey Approach: Risk Management

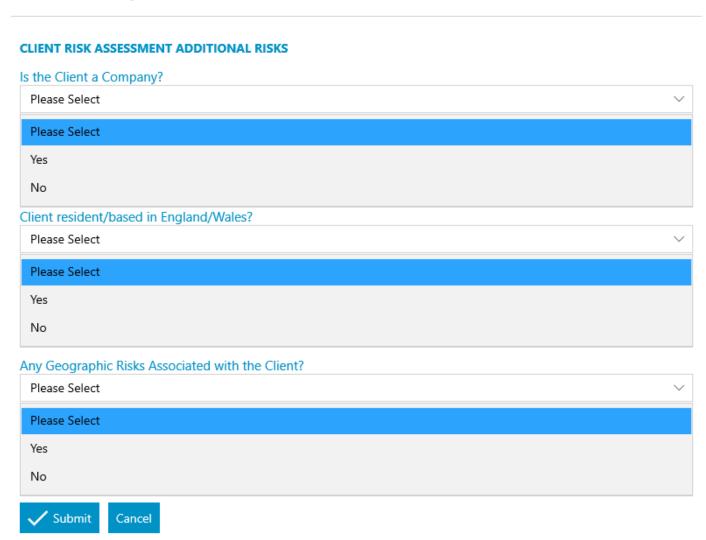
This help guide was last updated on Sep 15th, 2023

The latest version is always online at https://support.ospreyapproach.com/?p=43595



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.

ALLOCATE A CUSTOM QUESTIONNAIRE



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	in the second
Client 1 gender	
Please select	~
Please select	
Male	
Female	
Client 1 NI number	
Client 1 Occupation	
Cheffe F Occupation	
Client 1 - Is a Politically Exposed Person	
Please Select	~
Please Select	
Yes	
No	
Client 1 - Sanctions List Checked?	
Please Select	~

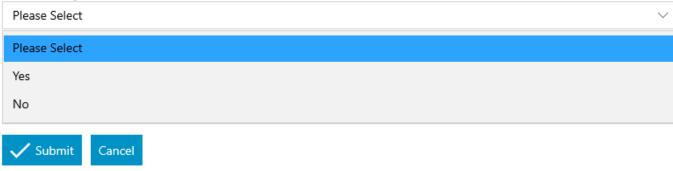
Client - Company Representative Status

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 Nο Please detail below who is instructing on behalf of the client company Client - Company Representative

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?



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

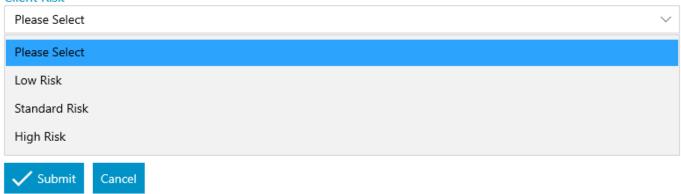


CLIENT 2 ADDITIONAL INFORMATION	
Client 2 Title	
Client 2 Initial	
Client 2 Forename	
Client 2 Middle Name	
Client 2 Surname	
Client 2 Address	
Client 2 date of birth	
Select a date	
Client 2 gender	
Please select	~
Please select	
Male	
Female	
Client 2 NI number	
Client 2 Occupation	
Client 2 - Is a Politically Exposed Person	
Please Select	~
Please Select	
Yes	
No	
Client 2 - Sanctions List Checked?	
Please Select	~

CLIENT RISK ASSESSMENT

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

Client Risk



CLIENT 1 ID FORMALITIES Client 1 - Present for Identification? Please Select Please Select Yes Nο Client 1 - 2 Forms of ID Obtained? Please Select Please Select Yes Nο Client 1 - Electronic Verification of ID Completed Please Select Please Select Yes Nο 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

Client 1 - Form of ID 2

Please Select V

Please Select

Select a date

MATTER RISK ASSESSMENT INSTRUCTIONS Nature and Purpose of Instructions Submit Cancel

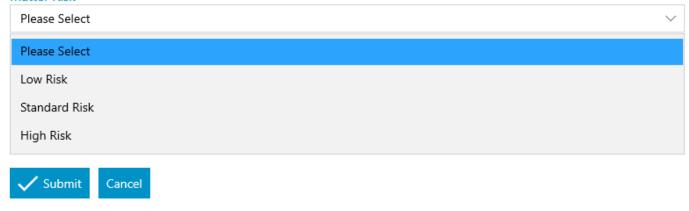
MATTER RISK ASSESSMENT ADDITIONAL RISKS

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	

MATTER RISK ASSESSMENT

Please select matter risk

Matter Risk



ALLOCATE A CUSTOM QUESTIONNAIRE

LEVEL OF DUE DILIGENCE

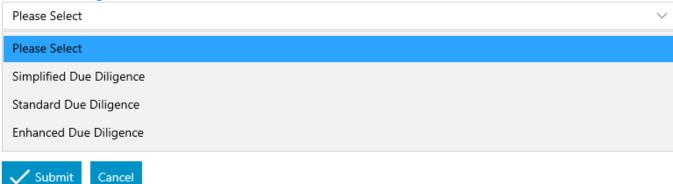
Please select the most appropriate level of Due Diligence

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

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

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

Level of Due Diligence



Questionnaire	
Please fill in the Questionnaire below:	
Please enter the amounts of each source of the funds being used in this transaction	Proceeds of Sale of Investments
Savings	Other Sources
Gift	Other Sources Details
Inheritance	
Proceeds of Sale of Existing Property	If any funds are being gifted, please give details of the person(s) who has/have made the gift Funds Contain Gift
Private Loan from Family/Friend	Please Select Please Select
Loan or Mortgage from Bank or Building Soc	Yes No Name of person(s) Gifting funds
	Relationship of person(s) Gifting funds
No.	Occupation of the Control of the Con
Next	Cancel
Address of person(s) Gifting funds	
Previous Su	ubmit Cancel
Previous Su	sbmit Cancel

SOURCE OF WEALTH AND FUNDS

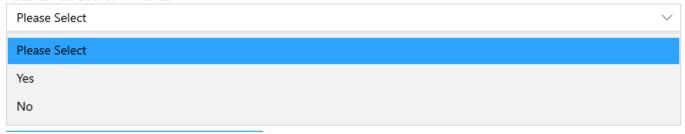
Please confirm that you have ascertained the source of the clients wealth. This refers to the origin of a client's entire body of wealth

Ascertained Source of Wealth



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

Ascertained Source of Funds



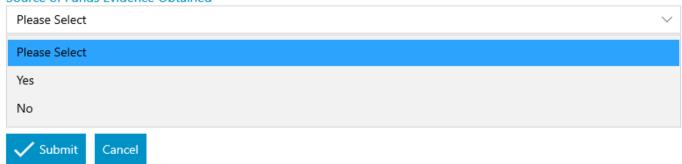
Do the funds to be used in this matter contain any monies that have been gifted to the client?

Funds Contain Gift



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

Source of Funds Evidence Obtained



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

Cancel

SOURCE OF FUNDS GIFT DETAILS	
Name of person(s) Gifting funds	
Polationship of person(c) 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	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG_ADD }
Address:	

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" " }{
	"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_II	
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 }
Oli i o i o i o i	
Client 3 is a PEP:	{ MERGEFIELD CLI3_ADD_INFO_CLI3_PEP }
Sanctions List Checked:	{ MERGEFIELD CLI3_ADD_INFO_CLI3_SANCTIONS }
" "" }{IF { MERGEFIELD CLI4_ADD_I	
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_FEI" } { MERGEFIELD "CLI4_ADD_INFO_CLI4_SANCTIONS" }
" "" }{ IF { MERGEFIELD CLI5_ADD_	·
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
	CLIS_ADD_INFO_FW_CLIS_MINAMIE \f \f\ \text{NIERGEFIELD} "CLIS ADD INFO FW CLIS SNAME" \}
Client E Date of Pirth	{ MERGEFIELD "CLI5_SNAWE }
Client 5 Date of Birth:	
Client 5 NI Number:	{ MERGEFIELD "CLI5_ADD_INFO_FW_CLI5_NI" } { MERGEFIELD CLI5 ADD INFO FW CLI5 ADD }
Client 5 Full Address:	

{ MERGEFIELD "CLI5_ADD_INFO_CLI5_PEP" }

{ MERGEFIELD "CLI5_ADD_INFO_CLI5_SANCTIONS" }

Client 5 is a PEP:

Sanctions List Checked:

[&]quot; "" }

<u>" ""</u>}

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_2 > <> "Please Select" "{ MERGEFIELD CLI1_ID_CLI1_ID_2 } - Expiry: {

MERGEFIELD CLI1_ID_CLI1_ID_2 = XP } " "" }

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_3 } <> "Please Select" "{ MERGEFIELD CLI1_ID_CLI1_ID_3 } - Expiry: {

MERGEFIELD CLI1_ID_CLI1_ID_3 = XP } "" }

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_3 = XP } "" " }

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_3 = XP } "" " }

{ IF { MERGEFIELD CLI1_ID_CLI1_ID_2 = XPO" "I have been unable to obtain at least 2 forms of ID because "" " \f" "

" " " \f" "

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



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	{ MERGEFIELD CL_CDD_CDD_CO_REP_AUTH }
Authorised to Instruct:	

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:

Fee Earner:

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

{ MERGEFIELD client_no }\{ MERGEFIELD matter_no }

{ MERGEFIELD CALCULATION_FEE_EARNER_DESCRIPTION }

Client Company Entity Full Name: MERGEFIELD LINKNAME_SURNAME_1		
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		
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 } MERGEFIELD MAT_CDD_CDD_NAT_PUR_INS } 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 comp " ""} { IF { MERGEFIELD MAT_CDD_CDD_UN_LARGE } = "Yes" "Please explain why this matter is unusually lattern of transaction " ""} { IF { MERGEFIELD MAT_CDD_CDD_UN_PAT } = "Yes" "Please explain why there is no apparent economic of legal purpose to this matter: """} { IF { MERGEFIELD MAT_CDD_CDD_ECO_LEG_PUR } = "Yes" "Please describe the Property or assets who tot situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or the property or assets who tot situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who tot situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who tot situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who tot situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who the property or assets		
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 } MATTER 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 comp " ""} { IF { MERGEFIELD MAT_CDD_CDD_UN_LARGE } = "Yes" "Please explain why this matter is unusually lattern of transaction " ""} { IF { MERGEFIELD MAT_CDD_CDD_UN_PAT } = "Yes" "Please explain why there is no apparent economic of legal purpose to this matter: """} { IF { MERGEFIELD MAT_CDD_CDD_ECO_LEG_PUR } = "Yes" "Please describe the Property or assets who to situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who to situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who to situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who to situated in England or Wales: """} { IF { MERGEFIELD MAT_CDD_CDD_EXC_PI } = "Yes" "Please explain why the value of case likely to exceed the property or assets who the prope		
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 } MATTER 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 comp " """} { IF { MERGEFIELD MAT_CDD_CDD_UN_LARGE } = "Yes" "Please explain why this matter is unusually lattern of transaction " ""} { IF { MERGEFIELD MAT_CDD_CDD_UN_PAT } = "Yes" "Please explain why there is no apparent economic of legal purpose to this matter: """} { IF { MERGEFIELD MAT_CDD_CDD_ECO_LEG_PUR } = "Yes" "Please describe the Property or assets who assistance of the property of the property of the property		
Client Company Entity Full Name: MERGEFIELD LINKNAME_SURNAME_1		
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 low prompt of the MAT_CDD_CDD_UN_LARGE } = "Yes" "Please explain the unusual pattern of transaction " "" } { IF { MERGEFIELD MAT_CDD_CDD_UN_PAT } = "Yes" "Please explain the unusual pattern of transaction or legal purpose to this matter: "" " } { IF { MERGEFIELD MAT_CDD_CDD_UN_ECOLEG_PUR } = "Yes" "Please explain why there is no apparent economic or legal purpose to this matter:		
Client Company Entity Full Name:		
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 for the company of the company		
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:		
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 }		
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		
Client Company Entity Full Name: MERGEFIELD LINKNAME_SURNAME_1		
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		
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Client Company Entity Full Name: { MERGEFIELD LINKNAME_SURNAME_1 } For detailed company/entity CDD please see Company CDD Verification Form " ""}		
Client Company Entity Full Name: { MERGEFIELD LINKNAME_SURNAME_1 }		
Client Company Entity Full Name: { MERGEFIELD LINKNAME_SURNAME_1 }		
MERGEFIELD CLI_CO_ADD_INFO_CLI_IS_CO } = "Yes" "		
"CLI1_ADD_INFO_FW_CLI1_SNAME" } For additional clients please see Client CDD Risk Assessment and Client CDD Verification Form(s)"		
"CLI1_ADD_INFO_FW_CLI1_MNAME" \f" "}{ MERGEFIELD		
Client 1 Full Name: { MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_TITLE" \f" "}{ MERGEFIELD "CLI1_ADD_INFO_FW_CLI1_FNAME" \f" "}{ MERGEFIELD "CLI1_FNAME" \f" "}		



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" "}{
	"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	{ MERGEFIELD CLI_CO_ADD_INFO_CLI_CO_REG_ADD }
Address:	

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 accertain 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

```
£{ MERGEFIELD CL_SOW_SOF_CDD_SOF_SAV }
Savings
Gift
                                          £{ MERGEFIELD CL_SOW_SOF_CDD_SOF_GIFT }
                                          £{ MERGEFIELD CL_SOW_SOF_CDD_SOF_INH }
Inheritance
Proceeds of Sale of Existing Property
                                          £{ MERGEFIELD CL_SOW_SOF_CDD_SOF_SALEPRO }
                                          £{ MERGEFIELD CL_SOW_SOF_CDD_SOF_PLOAN }
Private Loan from Family/Friend
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 }
                                          £{ MERGEFIELD CL_SOW_SOF_CDD_SOF_OTHER }
Other Sources
                                          { MERGEFIELD CL_SOW_SOF_CDD_SOF_OTR_DET }
Other Sources Details
                                          £{ MERGEFIELD fssm_CDD_SOF_TOTAL }
Total for Source of Funds
```

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

Date:

Fee Earners Signature:

Email to MLRO seeking



client

MESSAGE BODY

