

VQF Member No.	AMLA File No.

Risk Profile AMLA

Evaluation of business relationship with increased risk and definition of criteria for transaction monitoring

- The member performs additional clarifications if the business relationship or the transaction is classified as increased risk (Art. 56 SRO Regulations)

Customer:	
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This form was completed by:

Full Name:	
Date:	

1. EVALUATION OF POLITICALLY EXPOSED PERSONS (PEP-CHECK)

- This evaluation has to be completed by all members for every business relationship.

Foreign PEP

Is the customer, the beneficial owner or the controlling person or authorised representative a foreign PEP or closely related to such a person?

No

Yes => The business relationship is compulsory classified as increased risk.

Domestic PEP and PEP of International Organisations

Is the customer, the beneficial owner or the controlling person or authorised representative a domestic PEP or PEP in International Organisations or closely related to such a person?

No

Yes => Is a risk criterion pursuant to numeral 3 subsequently increased?

No

Yes => Classification of the business relationship as increased risk is compulsory

The decision of the Senior executive body on the acceptance of a business relationship with a PEP was obtained on _____

1. EVALUATION "HIGH RISK" OR NON-COOPERATIVE COUNTRY

- This evaluation has to be completed by all members for each business relationship.

"High risk" or non-cooperative country

Is the customer, the beneficial owner or the controlling person or authorised representative in a country considered by the FATF "high risk" or non-cooperative and for which FATF requires increased diligence?

No

Yes => considered as business relationship with increased risk.

The decision of the Senior executive body on the acceptance of such a business relationship was obtained on _____

1. EVALUATION OF BUSINESS RELATIONSHIP RISK

- This evaluation has to be completed by all members who have in total more than 20 customers for every business relationship. At least two risk categories have to be chosen and assessed.

a) COUNTRY RISK (nationality)

Domicile/residential address:

Customer

Beneficial owner of the assets

Controlling person

0

Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1)

1

Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1)

Nationality:

Customer

Beneficial owner of the assets

2

Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)

b) COUNTRY RISK (business activity)

Place of business activity:

Customer

Beneficial owner of the assets

0

Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1)

1

Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1)

2

Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)

c) COUNTRY RISK (payments)

Country of origin and destination of frequent payments (if known)

0

Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1)

1

Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1)

2

Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)

1. CRITERIA FOR IDENTIFICATION OF INCREASED RISK TRANSACTIONS (TRANSACTION MONITORING)

4.1 Criteria

Classification as increased risk is compulsory if:

- Transactions for which assets with an equivalent value of CHF 100'000.- or more are physically introduced at the beginning of the business relationship, either at once or in a staggered manner
- Money and asset transfers ("money transfer") whereby a single transaction or multiple transactions which appear to be related reach or exceed the amount of CHF 20,000.-

This form has to be updated immediately if changes occur.

RISK CLASSIFICATION		
Risk Factor	Rating	Comments
Country/Region		
UK	Low	
EU, Switzerland	Low	
Non-FATF	Medium	
Non-UK/EU	Medium	
PEP		
	High	No PEP served.
Crime		
Financial crime, fraud etc.	High	Account refused
Tax		
Tax crime or related	High	Account refused
Sanctions		
Sanctioned individual	High	Account refused
Occupation		
High risk sector	High	
Low risk sector	Low	
Trading volume		
More than CHF 20'000 in one transaction	Medium	
A transaction which would result in that client having completed transactions with a fiat value of more than CHF 100,000 with critto Technologies in the 12 months prior.	Medium	

Client:	
Client ID:	

Based on the above information and the reconciled SumSub Application Summary and the UBO, we assume the following risk class:

Client is accepted

Low

Medium

Client is rejected

High