

Client Name: \_\_\_\_\_

Type of CDD\*: \_\_\_\_\_

Country of Resident/ Incorporation: \_\_\_\_\_

Risk Rating\*\*: \_\_\_\_\_

Risk-Based Approach ("RBA")		YES	NO	N/A
1. Have we performed any further steps to mitigate following risk factors when determining the ML/TF risk rating of the Client?				
(a) Country risk - Client with residence in or connection with the below high-risk jurisdictions				
(i) countries identified by the FATF as jurisdictions with strategic AML/CFT deficiencies				
(ii) countries subject to sanctions, embargos or similar measures issued by international authorities (e.g. the UN)				
(iii) countries which are vulnerable to corruption				
(iv) countries that are believed to have strong links to terrorist activities				
(b) Client risk - Client with the below nature or behaviour might present a higher ML/TF risk				
(i) the public profile of the Client indicating involvement with, or connection to, politically exposed persons ("PEPs")				
(ii) complexity of the relationship, including use of corporate structures, trusts and the use of nominee and bearer shares where there is no legitimate commercial rationale				
(iii) request to use numbered accounts or undue levels of secrecy with a transaction				
(iv) involvement in cash-intensive businesses				
(v) nature, scope and location of business activities generating the funds/assets, having regard to sensitive or high-risk activities				
(vi) the Client is employed or self-employed / a corporation				
If yes, his Business/Occupation: _____				
If no, Client is unemployed, retired, or the source of income cannot be easily verified				
source of income from <input type="checkbox"/> Savings <input type="checkbox"/> Investment <input type="checkbox"/> Inheritance <input type="checkbox"/> Other _____				
(c) Distribution/delivery channels				
(i) a non-face-to-face account opening approach is used				
If yes, is the signature on cheque matched with the signature on application (Individual Client) / first payment was made from a bank account in FATF country (Corporate Client)?				
(ii) Business sold through third party agencies or intermediaries				
2. Do we maintain all records and relevant documents of the above risk assessment mentioned in Q1?				
If yes, are they able to demonstrate to the SFC the following?				
(a) how we assess the Client				
(b) the extent of CDD and ongoing monitoring is appropriate based on that Client's ML/TF risk				
3. Is the Client SFC licensed or is the Client's employer a licensed person?				
if yes, do we obtain a consent letter?				
4. World Check/Dow Jones: found no exception				
5. Google: found no exception				
Customer Due Diligence ("CDD")		YES	NO	N/A
6. Do we conduct the following CDD measures?				
(a) identify the Client and verify the Client's identity using reliable, independent source documents, data or information				
(b) where there is a beneficial owner in relation to the Client, identify and take reasonable measures to verify the beneficial owner's identity, including in the case of a legal person or trust, measures to enable us to understand the ownership and control structure of the legal person or trust				
(c) obtain information on the purpose and intended nature of the business relationship established with us unless the purpose and intended nature are obvious				
(d) if a person purports to act on behalf of the Client (Account Manager):				
(i) identify the person and take reasonable measures to verify the person's identity using reliable and independent source documents, data or information				
(ii) verify the person's authority to act on behalf of the Client (e.g. written authority, board resolution)				
For Corporate Client Only		YES	NO	N/A
7. Do we verify the identity of beneficial owner(s) (Including Directors) with reasonable measures, based on its assessment of the ML/TF risks, so that we know who the beneficial owner(s) is?				
If yes, are the following guidelines followed:				
(a) identify all beneficial owners (Including Directors) of a Client				
(b) take reasonable measures to verify the identity of any beneficial owners owning or controlling 10% or more of the voting rights or shares, etc. of a corporation, partnership or trust.				
(c) take reasonable steps to verify if beneficial owner/director is a PEP				
(d) obtain the residential address (and permanent address if different) of the beneficial owners / directors and proof of address issued within past three months				
8. When a person purports to act on behalf of the Client (Account Manager) and is authorized to give instructions for the movement of funds or assets, do we obtain the same set of identification information as required.				
9. Do we obtain the written authority to verify that the individual purporting to represent the Client is authorized to do so?				

\*Simplified Due Diligence (SDD): Corporate client who is /directly owned by a licensed entity, financial institution or listed company in Hong Kong or FATF member countries may qualify for SDD. (SDD doesn't require verifying the identity of direct Beneficial Owners.)

Enhanced Due Diligence (EDD) : If a client is classified as High AML Risk or the account opening application is Non Face-to face, EDD is required. PEP requires approval by MD , individual Non Face-to face requires HK\$10,000 cheque , corporate Non Face-to face first payment must come from bank account (FATF) in same name as

\*\*Please refer to AML Risk Rating Matrix

Prepared by: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_