



## AML CLIENT RISK FACTORS

### Trust

- 1. Is the client, or any party to the client a 'Trust and Company Service Provider'?** **Yes** **No**  
E.g. Trustee, Director.
- 2. Is the client a Personal Asset Holding Vehicle?** **Yes** **No**  
E.g. a shell company, a personal investment company (PIC) or an atypical trust (e.g. the settlor or trustee is also a beneficiary) established (usually offshore) to hold personal assets.

A shell company is a company which serves as a vehicle for business transactions without itself having any significant assets or operations. They may also be known as international business companies, personal investment companies, front companies or mailbox companies.

The use of such persons or arrangements may make identification of ultimate beneficial owners more difficult since layering of ownership may conceal the true source or controller of the investment.
- 3. Does the ownership structure of the client entity appear complex given the nature of the client?** **Yes** **No**  
E.g. a trust or corporate vehicle that is part of a multi-layered structure which seems excessively complex in relation to what you would expect for the size or purpose of the company.
- 4. Is the business conducted in unusual circumstances?** **Yes** **No**  
If there is anything you feel is unusual it can be raised here. A non-exhaustive list of examples may include:

  - the introduction or communication is from an unusual channel,
  - a client located outside of the UK has selected the firm based purely on an internet search i.e. no family or UK connections
  - a Qualifying Recognised Overseas Pension Scheme (QROPS) without an adviser.
- 5. Is the client listed on a stock exchange with adequate disclosure requirements?** **Yes** **No**  
The client is a company (or corporate vehicle) that is listed on:

  - the London Stock Exchange or AIM, or
  - a market that is on the EU Regulated Markets list  
[https://registers.esma.europa.eu/publication/searchRegister?core=esma\\_registers\\_mifid\\_rma](https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_mifid_rma) or
  - another market with assessed adequate disclosure requirements.