



## AML CLIENT RISK FACTORS

### Trust

- |  |            |           |
|--|------------|-----------|
| <b>1. Is the client, or any party to the client a 'Trust and Company Service Provider'?</b>  | <b>Yes</b> | <b>No</b> |
| E.g. Trustee, Director.  |            |           |
| <b>2. Is the client a Personal Asset Holding Vehicle?</b>  | <b>Yes</b> | <b>No</b> |
| 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.  |            |           |
| <b>3. Does the ownership structure of the client entity appear complex given the nature of the client?</b>   | <b>Yes</b> | <b>No</b> |
| 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.   |            |           |
| <b>4. Is the business conducted in unusual circumstances?</b>  | <b>Yes</b> | <b>No</b> |
| If there is anything you feel is unusual it can be raised here. A non-exhaustive list of examples may include:   |            |           |
| <ul style="list-style-type: none"><li>• the introduction or communication is from an unusual channel,</li><li>• a client located outside of the UK has selected the firm based purely on an internet search i.e. no family or UK connections</li><li>• a Qualifying Recognised Overseas Pension Scheme (QROPS) without an adviser.</li></ul>   |            |           |
| <b>5. Is the client listed on a stock exchange with adequate disclosure requirements?</b>  | <b>Yes</b> | <b>No</b> |
| The client is a company (or corporate vehicle) that is listed on:  |            |           |
| <ul style="list-style-type: none"><li>• the London Stock Exchange or AIM, or</li><li>• a market that is on the EU Regulated Markets list<br/><a href="https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_mifid_rma">https://registers.esma.europa.eu/publication/searchRegister?core=esma_registers_mifid_rma</a> or</li><li>• another market with assessed adequate disclosure requirements.</li></ul> |            |           |