

# IRIS Elements Risk Assessment Questions

## Private Limited Companies

### About the client

1. Have we verified the identity of the client and, where appropriate, the corporate body?
2. Have any of the documents supplied to us been found to be false or stolen?
3. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
4. Is the client outside our normal type of client?
5. Is the sector in which the client operates in any way unusual for us?
6. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
7. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
8. Has the client previously been the subject of any asset freeze?
9. Is the client known to be potentially involved in illegal activities?
10. Has the client been in any way obstructive or evasive when asked for information regarding ownership, the business undertaken or any other information we require?
11. What is the expected duration / regularity of the business relationship and is there anything unusual about this?
12. Will we be required to handle client money for this client?
13. Is money moved about between different accounts, institutions, or jurisdictions without apparent reason?
14. Does the client trade in Bitcoin or other digital currencies?
15. Does the client hold Non-Fungible Tokens as assets?
16. Are we aware of any history of loss-making transactions that have occurred without a logical explanation?
17. Is there any funding in place that lacks logical explanation?
18. Does the organisational structure seem unduly complex and without apparent legal / economic reasons?
19. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
20. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
21. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
22. Were there any matters arising from the firm-wide risk assessment analysis that was conducted?
23. Does the business appear to have an unnecessarily complex or unusual business structure?
24. Does the business have connections with individuals / businesses in high-risk countries or those with weak AML regimes?
25. Does a politically exposed person or close associate or a family member of a PEP have any involvement in the business?
26. Does the business have any involvement with any complex or unusually large transactions?
27. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
28. Does the business / entity pose a higher-than-normal risk for any other reason (perhaps because of remote control, poorly controlled cash income, or poorly controlled client accounts)?
29. Have you met the individuals instructing you in respect of this business / entity?
30. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
31. Is there an increase in the degree and nature of monitoring of the business relationship?
32. Has additional independent, reliable evidence for customer due diligence been sought?

### About the geography

1. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?

2. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
3. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?
4. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

#### About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Do the services involve the provision of nominee directors / shareholders / shadow directors or the formation of companies in third countries?
4. Are we providing investment, trust, or company services for this client? (If so, consider the risk that we may become concerned in an arrangement that facilitates money laundering.)
5. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

#### About the transactions

1. Has there been an examination of the background and purpose of any transactions the client is involved with?
2. Are we aware that the client has entered into transactions that are complex and unusually large, or there is an unusual pattern of transactions, and the transaction or transactions have no apparent economic or legal purpose?
3. Will payments be received from unknown or unassociated third parties?
4. Is there any transaction related to oil, arms, precious metals, tobacco products, cultural artefacts, ivory, and other items related to protected species, items of archaeological, historical and religious significance, or of a rare scientific value?
5. Have additional measures been taken to better understand the background and financial situation of the client?

#### About the operation

1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?

# Public Limited Companies

## About the client

1. Have we verified the identity of the client and, where appropriate, the corporate body?
2. Were there any matters arising from the firm-wide risk assessment analysis that was conducted?
3. Does the business appear to have an unnecessarily complex or unusual business structure?
4. Does the business have connections with individuals / businesses in high-risk countries or those with weak AML regimes?
5. Does a politically exposed person or close associate or a family member of a PEP have any involvement in the business?
6. Does the business have any involvement with any complex or unusually large transactions?
7. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
8. Does the business / entity pose a higher-than-normal risk for any other reason (perhaps because of remote control, poorly controlled cash income, or poorly controlled client accounts)?
9. Have you met the individuals instructing you in respect of this business / entity?
10. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
11. Is there an increase in the degree and nature of monitoring of the business relationship?
12. Has additional independent, reliable evidence for customer due diligence been sought?

## About the geography

1. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
2. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?
3. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

## About the transactions

1. Has there been an examination of the background and purpose of any transactions the client is involved with?
2. Have additional measures been taken to better understand the background and financial situation of the client?

# Partnership Non-LLP

## About the client

1. Have we verified the identity of the client and, where appropriate, the corporate body?
2. Have any of the documents supplied to us been found to be false or stolen?
3. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
4. Is the client outside our normal type of client?
5. Is the sector in which the client operates in any way unusual for us?
6. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
7. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
8. Has the client previously been the subject of any asset freeze?
9. Is the client known to be potentially involved in illegal activities?
10. Has the client been in any way obstructive or evasive when asked for information regarding ownership, the business undertaken or any other information we require?
11. What is the expected duration / regularity of the business relationship and is there anything unusual about this?
12. Will we be required to handle client money for this client?
13. Is money moved about between different accounts, institutions, or jurisdictions without apparent reason?
14. Does the client trade in Bitcoin or other digital currencies?
15. Does the client hold Non-Fungible Tokens as assets?
16. Are we aware of any history of loss-making transactions that have occurred without a logical explanation?
17. Is there any funding in place that lacks logical explanation?
18. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
19. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
20. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
21. Were there any matters arising from the firm-wide risk assessment analysis that was conducted?
22. Does the business have connections with individuals / businesses in high-risk countries or those with weak AML regimes?
23. Does a politically exposed person or close associate or a family member of a PEP have any involvement in the business?
24. Does the business have any involvement with any complex or unusually large transactions?
25. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
26. Does the business / entity pose a higher-than-normal risk for any other reason (perhaps because of remote control, poorly controlled cash income, or poorly controlled client accounts)?
27. Have you met the individuals instructing you in respect of this business / entity?
28. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
29. Is there an increase in the degree and nature of monitoring of the business relationship?
30. Has additional independent, reliable evidence for customer due diligence been sought?

## About the geography

1. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?
2. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
3. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?

4. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

#### About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Do the services involve the provision of nominee directors / shareholders / shadow directors or the formation of companies in third countries?
4. Are we providing investment, trust, or company services for this client? (If so, consider the risk that we may become concerned in an arrangement that facilitates money laundering.)
5. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

#### About the transactions

1. Has there been an examination of the background and purpose of any transactions the client is involved with?
2. Are we aware that the client has entered into transactions that are complex and unusually large, or there is an unusual pattern of transactions, and the transaction or transactions have no apparent economic or legal purpose?
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5. Have additional measures been taken to better understand the background and financial situation of the client?

#### About the operation

1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?

## Sole Trades

### About the client

2. Have we verified the identity of the client and, where appropriate, the corporate body?
3. Have any of the documents supplied to us been found to be false or stolen?
4. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
5. Is the client outside our normal type of client?
6. Is the sector in which the client operates in any way unusual for us?
7. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
8. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
9. Has the client previously been the subject of any asset freeze?
10. Is the client known to be potentially involved in illegal activities?
11. Has the client been in any way obstructive or evasive when asked for information regarding ownership, the business undertaken or any other information we require?
12. What is the expected duration / regularity of the business relationship and is there anything unusual about this?
13. Will we be required to handle client money for this client?
14. Is money moved about between different accounts, institutions, or jurisdictions without apparent reason?
15. Does the client trade in Bitcoin or other digital currencies?
16. Does the client hold Non-Fungible Tokens as assets?
17. Are we aware of any history of loss-making transactions that have occurred without a logical explanation?
18. Is there any funding in place that lacks logical explanation?
19. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
20. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
21. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
22. Is the client a politically exposed person (PEP) or subject to any official sanction?
23. Were there any matters arising from the firm-wide risk assessment analysis that was conducted?
24. Does the business have connections with individuals / businesses in high-risk countries or those with weak AML regimes?
25. Does a politically exposed person or close associate or a family member of a PEP have any involvement in the business?
26. Does the business have any involvement with any complex or unusually large transactions?
27. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
28. Does the business / entity pose a higher-than-normal risk for any other reason (perhaps because of remote control, poorly controlled cash income, or poorly controlled client accounts)?
29. Have you met the individuals instructing you in respect of this business / entity?
30. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
31. Is there an increase in the degree and nature of monitoring of the business relationship?
32. Has additional independent, reliable evidence for customer due diligence been sought?

### About the geography

1. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?
2. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?

3. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?
4. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

#### About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

#### About the transactions

1. Has there been an examination of the background and purpose of any transactions the client is involved with?
2. Are we aware that the client has entered into transactions that are complex and unusually large, or there is an unusual pattern of transactions, and the transaction or transactions have no apparent economic or legal purpose?
3. Will payments be received from unknown or unassociated third parties?
4. Is there any transaction related to oil, arms, precious metals, tobacco products, cultural artefacts, ivory, and other items related to protected species, items of archaeological, historical and religious significance, or of a rare scientific value?
5. Have additional measures been taken to better understand the background and financial situation of the client?

#### About the operation

1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?

# Non-incorporated Charity

## About the client

2. Have we verified the identity of the client and, where appropriate, the corporate body?
3. Have any of the documents supplied to us been found to be false or stolen?
4. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
5. Is the client outside our normal type of client?
6. Is the sector in which the client operates in any way unusual for us?
7. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
8. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
9. Has the client previously been the subject of any asset freeze?
10. Is the client known to be potentially involved in illegal activities?
11. Has the client been in any way obstructive or evasive when asked for information regarding ownership, the business undertaken or any other information we require?
12. What is the expected duration / regularity of the business relationship and is there anything unusual about this?
13. Will we be required to handle client money for this client?
14. Is money moved about between different accounts, institutions, or jurisdictions without apparent reason?
15. Does the client trade in Bitcoin or other digital currencies?
16. Does the client hold Non-Fungible Tokens as assets?
17. Are we aware of any history of loss-making transactions that have occurred without a logical explanation?
18. Is there any funding in place that lacks logical explanation?
19. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
20. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
21. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
22. Were there any matters arising from the firm-wide risk assessment analysis that was conducted?
23. Does the business have connections with individuals / businesses in high risk countries or those with weak AML regimes?
24. Does a politically exposed person or close associate or a family member of a PEP have any involvement in the business?
25. Does the business have any involvement with any complex or unusually large transactions?
26. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
27. Does the business / entity pose a higher-than-normal risk for any other reason (perhaps because of remote control, poorly controlled cash income, or poorly controlled client accounts)?
28. Have you met the individuals instructing you in respect of this business / entity?
29. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
30. Is there an increase in the degree and nature of monitoring of the business relationship?
31. Has additional independent, reliable evidence for customer due diligence been sought?

## About the geography

1. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?
2. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
3. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?

4. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

#### About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

#### About the transactions

1. Has there been an examination of the background and purpose of any transactions the client is involved with?
2. Are we aware that the client has entered into transactions that are complex and unusually large, or there is an unusual pattern of transactions, and the transaction or transactions have no apparent economic or legal purpose?
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4. Is there any transaction related to oil, arms, precious metals, tobacco products, cultural artefacts, ivory, and other items related to protected species, items of archaeological, historical and religious significance, or of a rare scientific value?
5. Have additional measures been taken to better understand the background and financial situation of the client?

#### About the operation

1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?

# Trusts

## About the client

2. Have we verified the identity of the client and, where appropriate, the corporate body?
3. Have any of the documents supplied to us been found to be false or stolen?
4. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
5. Is the client outside our normal type of client?
6. Is the sector in which the client operates in any way unusual for us?
7. Is the client a legal person / arrangement that is a vehicle for holding personal assets?
8. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
9. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
10. Has the client previously been the subject of any asset freeze?
11. Is the client known to be potentially involved in illegal activities?
12. Has the client been in any way obstructive or evasive when asked for information regarding ownership, the business undertaken or any other information we require?
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17. Does the client hold Non-Fungible Tokens as assets?
18. Are we aware of any history of loss-making transactions that have occurred without a logical explanation?
19. Is there any funding in place that lacks logical explanation?
20. Does the organisational structure seem unduly complex and without apparent legal / economic reasons?
21. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
22. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
23. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
24. Is the client a politically exposed person (PEP) or subject to any official sanction?
25. Have you met the individuals instructing you in respect of this business / entity?

## About the geography

1. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?
2. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
3. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?
4. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

## About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Are we providing investment, trust, or company services for this client? (If so, consider the risk that we may become concerned in an arrangement that facilitates money laundering.)

4. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

#### About the transactions

1. Are we aware that the client has entered into transactions that are complex and unusually large, or there is an unusual pattern of transactions, and the transaction or transactions have no apparent economic or legal purpose?
2. Will payments be received from unknown or unassociated third parties?

#### About the operation

1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?

# Individuals

## About the client

2. Have we verified the identity of the client and, where appropriate, the corporate body?
3. Have any of the documents supplied to us been found to be false or stolen?
4. Do we have any concerns as to why we have not been able to physically see the client face to face and have extra safeguards been put in place where this is the case (e.g. electronic signatures)?
5. Is the client outside our normal type of client?
6. Is the sector in which the client operates in any way unusual for us?
7. Is the client a legal person / arrangement that is a vehicle for holding personal assets?
8. Is the client's background consistent with what is known about their former, current, or planned business activity and source of funds?
9. Have there been any adverse media reports in connection with the client? (Consider a search of social and other media to identify such issues.)
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20. Are there concerns as to whether there are genuine reasons for the organisation handling cash?
21. Is the client currently undergoing or anticipating an external investigation e.g. by HMRC, OPBAS, etc.?
22. Is there a known history of violations of laws and regulations or claims against the client alleging money laundering or fraud?
23. Is the client a politically exposed person (PEP) or subject to any official sanction?
24. Does the business have connections with individuals / businesses in high-risk countries or those with weak AML regimes?
25. Does the business have any involvement with any complex or unusually large transactions?
26. Does the business have any involvement with transactions that have no apparent economic or legal purpose?
27. Have you met the individuals instructing you in respect of this business / entity?
28. Is the business / entity a member of a recognized professional body (chartered or certified accountants, solicitors, barristers or RICS)?
29. Is there an increase in the degree and nature of monitoring of the business relationship?
30. Has additional independent, reliable evidence for customer due diligence been sought?

## About the geography

1. Is the customer a third country national applying for residence rights or citizenship in an EEA state in exchange for transfers of capital or various other investments (sometimes referred to as golden visas)?
2. Is there anything unusual regarding the client's geographic location and their choice of us as accountants / auditors / tax advisors?
3. Is the client resident in a geographical area of high risk (e.g. countries identified as having ineffective counter money laundering systems, countries with significant levels of corruption or terrorism or financing of terrorism, countries subject to sanctions)?
4. Do the activities of the client involve countries where the production of drugs, drug trafficking, corruption or terrorism may be prevalent, for example jurisdictions with a poor score on the Transparency International Corruption Perception Index - [www.transparency.org](http://www.transparency.org)?

5. Does the client have any links with any non-co-operating countries, or jurisdictions with a higher risk of money laundering or terrorist financing, listed on the Financial Action Task Force or HM Treasury websites?

#### About the services and products

1. Is there any reason to believe that the services or products requested lend themselves to money laundering or terrorism financing?
2. Is there anything unusual regarding the services or products requested or the purpose of the business relationship?
3. Do the services involve the provision of nominee directors / shareholders / shadow directors or the formation of companies in third countries?
4. Are we providing investment, trust, or company services for this client? (If so, consider the risk that we may become concerned in an arrangement that facilitates money laundering.)
5. Has the client offered to pay unusually high fees for services which would not normally attract such fees?

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1. Has there been an examination of the background and purpose of any transactions the client is involved with?
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1. Are there any laws and regulations central to the ability of the client to conduct operations?

#### About the delivery channel

1. Is there any risk arising from either the introducer of this client or any intermediary it might use, including the introducer's/intermediary's relationship with the client?

#### Other matters

1. Are there any other factors that present a higher risk of money laundering or terrorist financing?