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Full name	
Date of Birth	
Home Address	
Address of Property to be sold (if different)	

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**Evidence of name and address**

(Tick to confirm evidence received and recorded in accordance with Part B below)

Evidence of name	<<>>
Evidence of address	<<>>

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**Initial Risk Assessment**

Risk level (circle relevant level)	Reasons for conclusion and level	If risk level is medium or high, describe action taken to mitigate risk
Low		
Medium		
High		

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**Interim Risk Assessment**

Risk level (circle relevant level)	Reasons for conclusion and level	If risk level is medium or high, describe action taken to mitigate risk
Low		
Medium		
High		

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**Final Risk Assessment**

Risk level (circle relevant level)	Reasons for conclusion	Reasons for conclusion
Low		
Medium		
High		

If the risk is assessed as high at the time of the assessment, the MLRO must act for the customer. If the risk level is medium or high, appropriate action must be taken to mitigate the risk.

**Certification**

I have verified the identity of the customer	
I have not verified the identity of the customer	Verifying customer identity: <<>>
I have seen the original documents	
Copies of the customer's documents are attached to this form	
Any photographs in the documents bore a good likeness to the customer	
Name of person giving this certification	
Position	
Company and branch (if applicable)	
Telephone number	
Signature	
Date	

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**(A) Evidence of residence (to be completed in the tables below)**

**Current full signed passport**

Passport number	<<>>	
Country code	<<>>	
Place of birth	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

**Current UK photo card driving licence**

Licence number	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

**National Identity Card**

Unique number/reference	<<>>	
Country of origin	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

**Firearms Certificate**

Certificate number	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

**Identity card issued by the Electoral Commission in Ireland**

Card number	<<>>	
Date of birth	<<>>	
Expiry date	<<>>	

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**(B) Evidence of address of the tables below)**

**Current photo card driving licence**

(Cannot be used here if already used elsewhere)

Licence number	<<>>	
Current address?	Yes / No (circle)	
Date of issue	<<>>	

**Current year's council tax bill**

Reference/account number	<<>>	
Current address?	Yes	
Local authority	<<>>	
Document date	<<>>	

**Benefits Entitlement Letter**

(Cannot be used here if already used elsewhere)

Reference/account number	<<>>	
Current address?	Yes	
Issuing authority	<<>>	
Document date	<<>>	

**Most recent mortgage statement**

Reference/account number	<<>>	
Current address?	Yes	
Lender	<<>>	
Document date	<<>>	

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**Bank or building society statement**

Reference/account number	<<>>	
Current address?	Yes	
Institution name	<<>>	
Document date	<<>>	

**Utility bill (excluding mobile phone)**

Reference/account number	<<>>	
Current address?	Yes	
Utility company	<<>>	
Document date	<<>>	

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## Examples of suspicious activity

The examples of suspicious activity are provided to assist you in assessing whether the transaction is suspicious. This is not a Firm Wide Risk Assessment. This is not a risk assessment.

consider on each transaction to 'assess the risk'. You should also consider the risk assessment but includes:

### **New Customers:**

1. [Have you met your customer in person?]
2. Is your customer reluctant to provide identification and/or source of funds?
3. Are either party to the transaction from a 'high risk' third country?
4. Have intermediaries been used in the transaction?
5. Has false information been provided in relation to the customer's identity?
6. Is there an apparent reason why the customer should not have been better placed to act?
7. Are there complex companies or structures which make it difficult to identify the true owner?
8. Are any of the individuals involved in the transaction based in high risk' third country or locations that carry a higher risk?
9. Are multiple lets being taken or is the customer immediately sub-let the property? Is the customer wishing to avoid the usual requirements of the lease?
10. <<Other>>]

identity and/or source of funds?  
'high risk' third country?  
transaction?

customer's identity?  
should another firm have been better placed to act?

which make it difficult to identify the true owner?

d/or locations that carry a higher risk?

ason? Is the customer wishing to avoid the usual requirements of the lease?

### **Existing Customers:**

1. [Is the transaction different from the customer's usual business?]
2. Is the transaction being carried out by a person who is not the customer?
3. What is the value of the transaction and is the customer not disclosing the source of funds?
4. Have any monies been paid to the customer by a third party who does not appear to be connected with the customer?
5. <<Other>>]

s of the customer?

market value with an unconnected person?

lly large and is the customer not disclosing the source of funds?

does not appear to be connected with the customer?

### **Transaction:**

1. [Is either party to the transaction acting in a hurried manner?]
2. Are funds being sent abroad to a third party?
3. Has the property been inspected and is the customer not disclosing the source of funds?
4. Are there any late changes to the transaction?
5. Are we being asked to hold funds for a period of time with no apparent reason which is not consistent with the customer's usual business?]

ng to be carried out quickly?

ination and/or to an unconnected person?

Has the property been inspected and is the customer not disclosing the source of funds?

action?

bove <<add sum>>] especially for transactions of a high value?

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6. Is the customer requesting cleared funds up front?
7. Is the transaction unnecessary?
8. Are funds being paid in part?
9. Are multiple payments being made?
10. Are there unusual sources of funds from an unknown/overseas source?
11. Are both or either party not known to the bank?
12. Is one party reluctant to use the bank for the conveyancing process?
13. Is the counterparty known to the bank?
14. <<Other>>]

15. Is the payment of a long let in cash or by cheque?
16. What are the parties hoping to achieve?
17. Is the transaction in a different currency?
18. Are there multiple bank accounts?
19. Is there a use of complex loans, mortgage or other financial obligations?
20. Is there a need for the conveyancing process?
21. Is the counterparty the legal owner?

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