CONFIDENTIAL

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|  | VQF Member No. | AMLA File No. |
|  |       |       |
| **Risk Profile AMLA** *Evaluation of business relationship with increased risk and definition of criteria for transaction monitoring* |

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| http://www.clipartbest.com/cliparts/KTn/gBA/KTngBAETq.jpeg | *The member performs additional clarifications if the business relationship or the transaction is classified as increased risk (Art. 55 SRO-Regulations)* |

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| Customer[[1]](#footnote-1) |       |

**This form was completed by:**

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| --- | --- |
| Full name |       |
| Date |       |

# Evaluation politically exposed persons (PEP-Check)

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| http://www.clipartbest.com/cliparts/KTn/gBA/KTngBAETq.jpeg | *This evaluation has to be completed by all members for every business relationship.*  |

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| Foreign PEP[[2]](#footnote-2)Is the customer, the beneficial owner or the controlling person or authorised representative a foreign PEP or closely related to such a person? | [ ] [ ]  No[ ]  Yes => The business relationship is compulsory  classified as increased risk.  |
| Domestic PEP[[3]](#footnote-3) and PEP in international organisations[[4]](#footnote-4)Is the customer, the beneficial owner or the controlling person or authorised representative a domestic PEP or PEP in international organisations or closely related to such a person? | [ ] [ ]  No[ ]  Yes => Is a risk criterion pursuant to numeral 2  subsequently increased? [ ]  No [ ]  Yes => The business relationship is  compulsory classified as increased risk. |
| The decision of the Senior executive body on the acceptance of a business relationship with a PEP was obtained on      . |

# Evaluation business relationship risk

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| http://www.clipartbest.com/cliparts/KTn/gBA/KTngBAETq.jpeg | *This evaluation has to be completed by all members, which have in total more than 20 customers, for every business relationship. At least two risk categories have to be chosen and assessed.*  |

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| **a) Country risk (nationality)** |
| [ ] **Domicile/residential address:**[ ] [ ]  Customer[ ] [ ]  Beneficial owner of the assets [ ]  Controlling person [ ]  **Nationality:** [ ]  Customer[ ] [ ]  Beneficial owner of the assets | 0 | [ ] [ ]  Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| 1 | [ ] **[ ]** Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| 2 | [ ] **[ ]**  Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| **b) Country risk (business activity)** |
| **Place of business activity:** [ ] **[ ]**  Customer[ ] **[ ]**  Beneficial owner of the assets | 0 | [ ] **[ ]**  Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| 1 | [ ] **[ ]**  Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1) |
| 2 | [ ] **[ ]**  Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| **c) country risk (payments)** |
| **Country of origin and destination of frequent payments (if known)** | 0 | [ ] **[ ]**  Risk 0 acc. to VQF country list (VQF doc. no. 902.4.1) |
| 1 | [ ] **[ ]**  Risk 1 acc. to VQF country list (VQF doc. no. 902.4.1) |
| 2 | [ ] **[ ]**  Risk 2 acc. to VQF country list (VQF doc. no. 902.4.1)  |
| **d) INDUSTRY RISK** |
| **Nature of customer's business activity:** [ ] **[ ]**  Customer*[ ]*  [ ]  Beneficial owner of the assets | 0 | [ ] **[ ]**  Clearly defined, transparent, easily comprehensible business activity well known to the member |
| 1 | [ ] **[ ]**  Business activity with a high level of cash transactions[ ] **[ ]**  Business activity not well known to the member |
| 2 | [ ] **[ ]**  Trade in munitions/arms, raw gem stones/diamonds, jewellery, international trade in exotic animals, casino and lottery business, trade in erotic wares[ ] **[ ]**  Member has no personal knowledge of the customer’s industry |

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| **e) CONTACT RISK** |
| **Types of contact to the** **customer/ beneficial owner of the assets** | 0 | [ ] **[ ]**  Personal acquaintance between member and  customer/beneficial owner of the assets over several years (at least 2) prior to entering into the business relationship. |
| 1 | [ ] **[ ]**  The customer/beneficial owner was not personally known to the member for several years (at least 2) prior to entering into the business relationship; however (a) no business was entered into in the absence of the customer/beneficial owner, or (b) the customer was at least introduced/brokered by a trusted third party. |
| 2 | [ ] **[ ]**  The customer/beneficial owner was not personally known to the member and business was entered into in the absence of the former (relationship by correspondence) and the customer was not introduced/brokered by a trusted third party. |
| **f) PRODUCT RISK** |
| **Nature of services and products requested by the customer** | 0 | [ ] **[ ]**  Easy to understand, transparent services and products whose financial background is easy to comprehend and verify |
| 1 | [ ] **[ ]**  More sophisticated services/products whose financial background is not readily easy to comprehend and verify. |
| 2 | [ ] **[ ]**  Main focus is offshore business (especially: relationships with domiciliary companies or other such offshore organisations)[ ] **[ ]**  The customer or beneficial owner of the assets has a large number of accounts with pass-through transactions (pass-through accounts)[ ] **[ ]**  Complex services/products whose financial background can only be understood or verified in a limited manner or at great expense. |
| **g) CRITERIA DEFINED BY THE MEMBER**  |
|       | 0 | [ ] [ ]  |       |
| 1 | [ ] [ ]  |       |
| 2 | [ ] [ ]  |       |
|       | 0 | [ ] [ ]  |       |
| 1 | [ ] [ ]  |       |
| 2 | [ ] [ ]  |       |

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| **Overall assessment of the business relationship** |
| [ ] A business relationship is classified as increased risk:* Business relationship with PEP pursuant to numeral 1 (no exception possible)
* Min. one criterion pursuant to numeral 2 was assessed with risk 2 or min. two criteria pursuant to numeral 2 were assessed with risk 1 (exception: The member justifies below why the business relationship overall does not have to be classified as increased risk despite the fact that individual risk criteria are increased).
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| Justification for diverging risk assessment  |       |
| Risk classified | [ ] [ ]  **Business relationship without increased risk**[ ] [ ]  **Business relationship with increased risk** |
| The decision of a senior person/body or the management on the acceptance of a business relationship with increased risk was obtained on      . |

# Criteria for identification of increased risk transactions (transaction monitoring)

## 3.1 Criteria

 The following transactions are compulsory classified as increased risk:

1. Transactions, in which assets with an equivalent value of CHF 100'000.- or more are physically introduced at the beginning of the business relationship, either at once or in a staggered manner
2. Money and asset transfers ("money transfer"), whereby a single transaction, or multiple transactions which appear to be related, reach or exceed the amount of CHF 5,000.-

## 3.2 Additional criteria defined by the member

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| http://www.clipartbest.com/cliparts/KTn/gBA/KTngBAETq.jpeg | *All members have to define for every business relationship min. 1 additional criterion to identify unusual transactions*[[5]](#footnote-5)*.* |

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**🡺 This form has to be updated when changes occur.**

1. Pursuant identification form (VQF doc. Nr. 902.1) numeral 1. [↑](#footnote-ref-1)
2. Definition see Art. 8 lit. f numeral 1 SRO-Regulations. [↑](#footnote-ref-2)
3. Definition see Art. 8 lit. f numeral 2 SRO-Regulations. [↑](#footnote-ref-3)
4. Definition see Art. 8 lit. f numeral 3 SRO-Regulations. [↑](#footnote-ref-4)
5. Possible criteria (Art. 58 Para 2 SRO-Regulations):

- the amount of inflowing and outflowing assets; **or**

- type, volume and frequency of transactions usual to the business relationship (considerable variance would be unusual); **or**

- type, volume and frequency of transactions usual to comparable business relationships (considerable variance would be unusual); **or**

- description of expected transaction patterns which the client notify the member of (considerable variance would be unusual). [↑](#footnote-ref-5)