



### List of questions

This is a list of the questions that you will have to answer in the questionnaire. Do not complete this version, only use the form that is emailed to you.

### These questions may change

#### Questions

*Your position within the firm\**

If you hold both positions, please select COLP

COLP

Authorised Signatory

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*Your anti-money laundering activities*

### Have you assessed in writing the sanctions risks your firm may be exposed to?

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For example, which work areas or client groups are most likely to result in a sanctions breach.

Yes

No

**Do you have clients with a connection to any of the countries listed below? (Select all that apply)**

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For the purpose of answering this question we are following the Office of Financial Sanctions Implementation guidance and a client is to be regarded as "connected with" a country if the person is—

- a. an individual who is, or an association or combination of individuals who are, ordinarily resident in that country,
- b. an individual who is, or an association or combination of individuals who are, located in that country,
- c. a person, other than an individual, which is incorporated or constituted under the law of that country ,or
- d. a person, other than an individual, which is domiciled in that country.

Afghanistan

Republic of Belarus

Bosnia and Herzegovina

Burundi

Central African Republic

Democratic People's Republic of Korea (North Korea)

Democratic Republic of the Congo

Guinea

Republic of Guinea-Bissau

Haiti

Iran

Iraq

Lebanon

Libya

Mali

Myanmar

Nicaragua

Russia

Somalia

South Sudan

Sudan

Syria

Venezuela

Yemen

Zimbabwe

None of the above

Don't know (please explain)

Please explain why you selected 'Don't know'. \*

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*Do you provide advice to clients in any of the following areas of work? (Select all that apply)\**

Trade (imports/exports outside of the UK)

Shipping

Aviation

Immigration

Financial Sanctions

None of the above

Don't know (please explain)

Please explain why you selected 'Don't know'.\*

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*Do you identify clients, including ultimate beneficial owners (if the client is not a natural person) or those who control the company.\**

Identification of a client or a beneficial owner is being told or otherwise coming to know a client's identifying details, such as their name, date of birth and address. An ultimate beneficial owner is the natural person who ultimately owns or manages a company. Control of a company can include direct and indirect control.

Yes – all

Yes – some

No

Don't know (please explain)

Please explain why you selected 'Don't know'\*

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*Do you verify clients' identities, including ultimate beneficial owners, using independent materials\**

For example, passports or other equivalent documentation

- Yes – all
- Yes – some
- No
- Don't know (please explain)

Please explain why you selected 'Don't know'\*

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*Do you carry out source of funds checks on matters?\**

Source of funds refers to the funds that are being used to fund the matter you are acting on and understanding how and where the client got the money for this transaction or business relationship.

- All matters including legal fees
- All matters excluding legal fees
- Some matters including legal fees
- Some matters excluding legal fees
- Legal fees only
- No we do not check the source of funds
- Don't know (please explain)

Please explain why you selected 'Don't know'\*

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*How do you check whether a new client is on the UK sanctions list? (Select all that apply)\**

- We check the Foreign, Commonwealth and Development Office (FCDO) produced UK Sanctions List and associated e-alerts
- We check the Office of Financial Sanctions Implementation's (OFSI) consolidated list of asset freeze targets and associated products (OFSI financial sanctions notices/e-alerts/consolidated list search function)
- We use an e-verification provider for all clients
- We use an e-verification provider for some clients
- We do not check if our clients are subject to sanctions

*Do you check if an existing client is subject to sanctions during the life of a matter?\**

- Yes – after a set period of time
- Yes – we rely on our e-verification provider
- No, we do not check during the life of the matter

*In the past 24 months, have you carried out any work for a sanctioned individual, organisation or ship or vessel (also known as a designated person)?\**

- Yes, with a licence from Office of Financial Sanctions Implementation
- Yes, without a licence from Office of Financial Sanctions Implementation
- No
- Don't know (please explain)

Please explain why you selected 'Don't know'\*

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*Are you currently holding any frozen assets or funds that belong to a designated person (including those of entities owned or controlled by a designated person)?\**

- Yes
- No

( ) Don't know (please explain)

Please explain why you selected 'Don't know'\*

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*In the last 24 months have you made a report to the Office for Sanctions Implementation?  
(Select all that apply)\**

- Reported a designated person
- Reported frozen assets
- Reported a breach of sanctions (including breach of a licence)
- Other (please specify)
- None of the above
- Don't know (please explain)

Please explain why you selected 'Don't know'\*

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Please specify why you selected 'Other'\*

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If you would like to add commentary to provide background to any of the answers you have provided, please do so below.

Please note this is not a substitute for submitting a report under Paragraph 3.9 and Paragraph 3.10 of the SRA Code of Conduct for Firms if you have committed a breach which you need to report to us. For more information please [read Reporting and notification obligations](#).

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SPECIMEN ONLY