

# Know Your Client (KYC)

Know Your Client (KYC) helps us identify and verify our clients. By carrying out client due diligence and identity verification, the risk of unknowingly working with people or organisations involved in illegal activity or money laundering are minimised. We therefore thank you in advance for providing the requested information below.

Registered Client Name:

Client Reference:

Conducted by:

Conducted date:

Agreed by:

Agreed Date:

Date of Next Review:

## 1. KYC Onboarding Form

Trading Name	
Nature of the client’s business	
Company and VAT Numbers (if applicable)	
Contact telephone number	
Email address	
Website	

Countries in which the client is registered and operating	Registered Address

<b>Structure of client (if commercial entity)</b>  <i>Example: Partnership, limited company or LLP etc. including shares/ownership breakdown</i>	
How many years has the client has been trading?	
Previous financial years turnover (if applicable)	
Projected turnover for next financial year	
Number of employees	
How was the client introduced to the practice?	

Full names of all beneficial owners, partners, directors, Trustees and/or Settlers	Address

Additional Information or Comments	
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## 2. KYC Onboarding Checklist

Have all beneficial owners/partners/directors photo ID and proof of addresses been obtained, and copies retained on file?	
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Name of beneficial owners/partners/directors whose identify has been verified	Form of ID Provided	Proof of Address Provided

Where necessary have reasonable steps been taken to verify beneficial ownership (e.g. have share certificates/partnership agreements etc. been obtained and retained on file)?	
Has a search of the beneficial ownership Register been undertaken and is it consistent with our understanding of the beneficial owners?	
Has a certificate of incorporation/partnership agreement/trust deed been obtained?	
If so, has a copy been retained on file?	
Have financial records from the client's accountant been obtained and are the client's tax affairs up to date?	
If yes, have copies been retained on file?	
Has Companies Registration Office/Companies House been consulted to confirm that information provided by the client corresponds with information held on the public register?  <i>Note: The Fifth Money Laundering Directive obliges accountants to report any discrepancies to Companies House <a href="#">HERE</a></i>	
Has it been verified if the client has any significant overseas interests or operations?	
Has an open-source adverse media search been completed online?	
Who are the client's key stakeholders, i.e. suppliers, overseas partners and other associated business partners?	
Has a reasonable risk-based approach been taken in relation to sanctions screening?	

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*Note: It is advised that all clients are screened at onboarding.*

## 3. Client Risk Assessment Onboarding Form

***This client risk assessment is to be conducted at the on-boarding process and part of its on-going monitoring. This assessment should be updated if there are any significant changes.***

<b>(i) CLIENT RISK</b>	
<b>Is the client a politically exposed person (PEP)?</b>  <i>Note: PEPs are individuals whose prominent position in public life may make them vulnerable to corruption. The definition extends to immediate family members and known close associates.</i>	
<b>Do you have full visibility and knowledge of the beneficial owners' and/or all directors?</b>	
<b>Is the client a high-net-worth individual? (e.g. assets of €1m/£1m or more)</b>	
<b>Does the client or its beneficial owners have attributes known to be used by money launderers or terrorist financiers? (e.g. is the structure of the customer is unusual or excessively complex?)</b>	
<b>Has evidence/documents proving source of wealth and funds been provided?</b>	
<b>Has the client provided proof of identification and proof of address?</b>	
<b>Has the client been evasive, uncooperative or reluctant to provide ID?</b>	
<b>Is the client a public administration, or a publicly owned enterprise?</b>	
<b>Is the client/firm securities listed on a regulated market?</b>	
<b>(ii) GEOGRAPHIC RISK</b>	
<b>Is the client/firm based within close 10 miles of our firm?</b>	
<b>Is the client based outside of Ireland?</b>	
<b>Does the client have any association with a Sanctioned jurisdictions (e.g. does the client transact with customers in sanctioned jurisdictions or have operations or trade with jurisdictions subject to sanctions)?</b>	
<b>Does the client have any association with any geographical areas that are considered to have weak AML and Terrorist Financing controls (e.g. does the client transact with customers in countries listed on the 'FATF High-risk and other monitored jurisdictions' or the 'European Commission list of third countries with weak AML and terrorist financing regimes)?</b>	

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<b>(iii) SERVICE RISK</b>	
Will the client be using our client money account?	
Will we be providing trust or company services for the client?	
Is the business relationship between you and the client logical and practicable? E.g. The size of the firm's business proportionate to the firm.	
Is it understood why the client has come to use our services (e.g. referred by an existing client)?	
<b>(iv) INDUSTRY RISK</b>	
Would the client be considered a cash intensive business (e.g. restaurants, retail outlets etc)?	
Does the client deal with high value goods (e.g. jewellers, car dealerships, properties etc)?	
Does the client operate in an industry typically considered high-risk of money laundering or terrorist financing? (e.g. money services business, import/export, charities etc.)	
<b>(v) DELIVERY CHANNEL RISK</b>	
Have you met the client face to face?	
<b>(vi) Notes (Summarise the client risks and any further comments here):</b>	
<b>Initial Assessment of Risk</b>	
<b>Final Assessment of Risk</b>	
<b>(vii) Notes (If there is any reason to override the initial assessment risk score, please specify here)</b>	