

## 1 June 2022

Each SRA-regulated firm that is within the scope of the AML regulations will need to answer the questions below by 31 July 2022, using a *dedicated online form* that will be available from 6 June 2022. We plan to email firms more details of the online process, including a unique hyperlink for your firm, on 6 June.

You can use this document to review the questions and prepare your firm's answers. Do not attempt to respond using this document. You must respond using the online form – responses received by email or post will not be processed or acknowledged.

- 1. What percentage of all the matters opened (ie new matters) were in scope of AML last year?
  - 0
  - 0 1-25
  - o **26-50**
  - o 51-75
  - o 76-100
  - o All matters treated as in scope, whether in scope or not
  - Don't know
- 2. What percentage of your fee earners do any work in scope of AML?
  - 0
  - o **1-5**
  - o 6-20
  - o 21-50
  - 0 51-99
  - 100 (or we assume all fee earners do work in scope)
  - Don't know
- 3. What was the largest single deposit (ie transfer) of money into your client account in the last year?
  - o £0
  - o £1-10,000
  - o £10,001-100,000
  - o £100,001-1,000,000
  - o £1,000,001-10,000,000
  - o £10,000,001+
  - Don't know

4.	What is your acceptance limit for physical cash payments (excluding physical cash payments for fees)?  None allowed  £1-500  £501-2,000  £2,001-5,000  £5,001+  Don't know
5.	How many formal internal reports of suspicion were made by staff to the Money Laundering Reporting Officer (sometimes known as the 'nominated officer') or any of their deputies in the last year?  o 0 o 1-3 o 4-7 o 8-15 o 16-30 o 31+ o Don't know o Not applicable - there is only one person working at my firm
6.	How many Suspicious Activity Reports (SARs) did your firm submit to the National Crime Agency last year?  o 0 o 1-3 o 4-7 o 8-15 o 16+ o Don't know
7.	What percentage of your firm's new AML matters in the last year had Enhanced Due Diligence applied to them? (If you cannot answer this question, please answer with the percentage of new AML matters that were rated as high risk).

8.	What percentage of new AML matters in the last year involved a client or /counterparty established in a high risk third country or in a country that your firm treats as a high risk third country for the purposes of customer due diligence?  o 0  o 1-10  o 11-20  o 21-40  o 41-60  o 61-100  o Don't know
9.	Has your firm acquired, amalgamated with or been absorbed by (including being purchased in its entirety by) another entity in the last year?  O Yes O No
10.	What was the largest percentage of overall (both in and out of scope of AML regulations) fees earned from one client over the last year (ie what percentage of your total fees came from the client that paid you the most in fees)? This client could be an individual, an entity or a group of entities.  o 1-5  o 6-10  o 11-20  o 21-40  o 41+  o Don't know
11.	How many clients have you acted for in the last year who were a Politically Exposed Person (PEP) excluding instances where the beneficial owner of a client was a PEP? (A definition of PEP can be found in 16 of the Financial Conduct Authority's guidance and includes, for the purpose of this question 'a family member or a known close associate of a PEP' as per regulation 35(1)(b))  0  1-3  4-7  8-15  16+  Don't know

- 12. Number of times that you have returned more than £5,000 from your client account in the last year? This could be either because your instructions from the client have been cancelled or a party (client or otherwise) claimed to have deposited money in your account in error.
  - 0
  - o **1-3**
  - 0 4-7
  - 0 8-15
  - o 16+
  - o Don't know
- 13. In the last year, have you carried out any work for a <u>sanctioned</u> (ie they were sanctioned by the UK Government at the time of the work and not subsequently) individual or organisation, also known as a designated person?
  - Yes, with a license from OFSI
  - o Yes, without a license from OFSI
  - o No
  - Don't know