



Client Risk Based Assessment Form (Individual / Corporate) – New Application

To Be Completed by DR / Remisier

Date: _____

Client Name: _____

DR / Remisier Code: _____

Note: Tick **ONE (1)** only for each question

No.	Parameters		Tick "✓"	Point
Risk Factor: Status of Client				
1	Type of business activities / employment of a corporate / an individual	Activities / employment can be verified by publicly available information or can be described without any difficulty		1
		Charity, foundation or trust		2
		Activities / employment cannot be verified by public sources or corporate appears to be shell company / SPV or PIC		3
2	Is your client a Political Exposed Person (PEP)? (i.e. holding position that relates to politic such as senior politician etc.)	Not related to PEP		1
		A family member / close associate to the PEP		2
		A local and/or foreign PEP (Note 1)		3
Risk Factor: Non Face-to-Face Contact				
3	Have you ever contacted your client face-to-face?	Yes		1
		No, but contacted by electronic / video call e.g. Skype		2
		No, but by phone / fax / email only		3
Risk Factor: Client's Location				
4	Is your client's nature of business / employment listed in Appendix 1 ?	Not in the list of Appendix 1		1
		Not sure		2
		Yes. In the list of Appendix 1		3
5	Is your client's location of Business / Employment from a high risk country / tax haven jurisdiction as listed in Appendix Item 2 ?	No		1
		Not sure		2
		Yes		3
Risk Factor: Client's Financial Profile				
6	Is your client a high net worth person / entity?	Individual	< RM 500K	1
			RM 500K – RM 3 million	2
			> RM 3 million	3
		Entity	< RM 5 million	1
			RM 5 million – RM10 million	2
			> RM 10 million	3
Risk Factor: Client's Authenticity and Cooperativeness				
7	Has your client provided acceptable standard ID and address that is easily verifiable?	Yes		1
		No (e.g. in the case of foreign client due to limited sources in verifying the ID & Address)		3
Risk Scoring (Total Points)	For New Applicant with answered 7 questions: _____ points			
Due Diligence Level (Tick "✓" one only)	<input type="checkbox"/> 1 – 13 (Low Risk) – Customer Due Diligence			
	<input type="checkbox"/> 14 – 18 (Medium Risk) – Customer Due Diligence			
	<input type="checkbox"/> (Above 18 OR fall under Note 1) – Enhanced Due Diligence [Note 1 = Default High Risk]			

Applicant is categorized as "High Risk" if above 18 points or by default (where Note 1 appears) and as such, Enhanced Due Diligence (EDD) is required. Please furnish additional documents (Latest 3 months Bank statement / FD / Latest Income Tax Form / 3 months' Salary Slip etc.) for Enhanced Due Diligence (EDD) purposes.

Justification for the above High Risk Client: _____

DR / Remisier Signature

Date

**Appendix 1**

1. Non-bank Financial Institutions:

Brokers of dealers in securities / derivatives	Financial Service Intermediaries such as Investment Advisors
Finance / Loan Companies	Money service - money transmitters, or check casher
Unit Trust Companies	Money service - foreign exchange dealers
Insurance Companies	Money service - Issuer or seller of travelers checks and money orders
Real Estate closing and settlement services	Money service - provider or seller of prepaid access

2. Shell Companies OR 2 dollars Companies

3. Non-Financial Organizations

Pawnbrokers	Casino, Gaming or betting operations
Dealers in high value art or antiques	Dealers in precious metals, stones, or jewels
Travel Agents	Dealers in planes, cars, and boats
Arms Trading or dealing	Trusts, or any Professional Service Providers
Vehicle Sellers	Charities / Non-Governmental Organizations

4. Cash-Based Business:

Vending companies	Taverns or bars	Nightclubs	Adult entertainment	Taxi services
Car washes	Auto repair garages	Parking garages	Cigarette distributors	Liquor stores, Off licenses
Restaurants	Petrol / Gas stations	Convenience stores	Laundromats	

Appendix 2

1. From FATF (Financial Action Task Force) black or grey list countries:

Albania	Haiti	Nicaragua	Syria
Barbados	Jamaica	Pakistan	Uganda
Botswana	Malta	Panama	Yemen
Burkina Faso	Mauritius	Philippines	Zimbabwe
Cambodia	Morocco	Senegal	
Cayman Islands	Myanmar	South Sudan	

Based on sources from <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-june-2021.html>

2. Tax Havens

American Samoa	Guam	Trinidad and Tobago
Anguilla	Palau	US Virgin Islands
Dominica (new)	Panama	Vanuatu
Fiji	Samoa	Seychelles

Based on sources from <https://www.consilium.europa.eu/en/policies/eu-list-of-non-cooperative-jurisdictions/>