

## 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

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

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

- Yes
- No

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Do you have clients with a connection to any of the countries listed below?

*For the purpose of answering this question a client is to be regarded as 'connected with' a country if the person is—*

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

- Republic of Belarus
- Bosnia and Herzegovina
- Burundi
- Central African Republic
- China and Hong Kong
- Democratic People's Republic of 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

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

- Trade
- Shipping
- Aviation
- Immigration
- Financial Sanctions
- None of the above
- Don't know

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Do you identify clients, including ultimate beneficial owners (if the client is not a natural person).

*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 and address.*

- Yes – all
- Yes – some
- No
- Don't know

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Do you verify clients' identities using independent materials?

*For example, independent materials includes, passports or other equivalent documentation*

- Yes – all
- Yes – some
- No
- 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 transaction you are acting on and understanding how and where the client got the money for this transaction or business relationship.*

- Yes – all matters
- Yes – some matters
- Yes – legal fees
- No
- Don't know

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How do you check whether a new client is on the UK sanctions list?

- We check the UK consolidated sanctions list maintained by the Office of Financial Sanctions Implementation (OFSI) direct
- We use an e-verification provider
- We do not check if our clients are subject to sanctions

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Do you check if an existing client has been added to the UK sanctions list 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

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

- Yes, with a licence from the Office of Financial Sanctions Implementation
- Yes, without a licence from the Office of Financial Sanctions Implementation
- No

- Don't know

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Are you currently holding any frozen assets or funds that belong to a designated person?

- Yes
- No
- Don't know

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In the last 24 months have you made a report to the Office of Financial Sanctions Implementation?

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

SPECIMEN ONLY