

AML CUSTOMER RISK RATING FORM
FOR USE BY BANK /RSL / RWML OFFICIAL ONLY

Branch / Unit:		Date:											
Customer Name:		RIM#:											
SECTION 1 : TO BE COMPLETED FOR ALL CUSTOMERS		Score Column	Response: Yes/ No/ N/A										
1 The customer is conducting business with individual/entities residing in/located in a high risk/sanctioned country (Refer to FTS 18-1 Foreign Sanctions - High Risk and Sanctioned Countries)		5	0										
2 The customer is deemed high risk by Compliance ¹		5	0										
SECTION 2 : TO BE COMPLETED FOR PERSONAL CUSTOMERS ONLY													
1 The customer/Power of Attorney is a national/resident of a sanctioned/high risk country whose nationals are deemed to be high risk but has not obtained residency/citizenship in a country whose nationals are not deemed to be high risk (Refer to FTS 18-1)		5	0										
2 The customer/Power of Attorney is a national of a high risk/sanctioned country whose nationals are deemed to be high risk but has obtained residency/citizenship in a country whose nationals are not deemed to be high risk (Refer to FTS 18-1)		3	0										
3 The customer/Power of Attorney is a resident/national of a country whose nationals are deemed to be medium risk. (Refer to FTS 18-1)		3	0										
4 The customer meets the PEP qualifying criteria and currently holds the position in public office OR has been out of office for 2 years or less OR has been out of office more than 2 years but is still publicly or otherwise known to be actively involved in the political arena		5	0										
5 The customer is a relative or close associate of a PEP as identified in question 4 above (e.g. spouse, partner, child, parent, joint account holder etc.).		5	0										
6 The customer is a Private Banking and/or other wealth management customer with cumulative balances of over 5M TTD (or its equivalent).		5	0										
7 Expected annual credit turnover		\$											
SECTION 3 : TO BE COMPLETED FOR NON-PERSONAL CUSTOMERS ONLY (INCLUSIVE OF SOLE TRADERS)													
1 The customer is located in a high risk country, as defined by the Bank/Group Compliance (Refer to FTS 18-1)		5	0										
2 The customer is categorised as a Listed Business by the Financial Intelligence Unit of Trinidad and Tobago (FIUTT) ³ (This does not apply to Non-Profit Organisations)		5	0										
3 The customer is an Attorney/ Accountant or a Legal/ Accounting firm but does not perform the specific functions which would qualify them as a listed business and a duly signed AML 8 form is on file.		3	0										
4 The customer is categorised as a High Risk Business ⁴		5	0										
5 The business is categorised as a Non-Profit Organisation ⁵ and has an annual credit turnover of more than or equal to \$1.2M TT (or its equivalent).		5	0										
6 The business is categorised as a Non-Profit Organisation and has an annual credit turnover of more than or equal to \$0.5M TT (or its equivalent) but less than \$1.2M TT (or its equivalent).		3	0										
7 The Customer/Business Entity is registered in a foreign country with no local operations.		5	0										
8 A controlling person ⁶ or signatory is a PEP/PEP-A, a national/resident of a sanctioned/high risk country whose nationals are deemed to be high risk but has not obtained residency/citizenship in a country whose nationals are not deemed to be high risk (Refer to FTS 18-1) or deemed high risk by Group Compliance.		5	0										
9 Deposits will account for in excess of \$1M TT (or its equivalent) per month where cash deposits account for 50% or more of total deposits.		5	0										
TOTAL SCORE:		0											
<p>GUIDE: Interview the customer to obtain responses to applicable questions above. Select the appropriate responses using the picklist options in the 'Response' column. Based on the TOTAL SCORE, use the Score Legend below to determine the customer risk rating.</p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th colspan="2">SCORE LEGEND</th> </tr> <tr> <th>Total Score</th> <th>Risk Rating</th> </tr> </thead> <tbody> <tr> <td align="center">≥ 5</td> <td align="center">High Risk</td> </tr> <tr> <td align="center">3</td> <td align="center">Medium Risk</td> </tr> <tr> <td align="center">0</td> <td align="center">Low Risk</td> </tr> </tbody> </table>				SCORE LEGEND		Total Score	Risk Rating	≥ 5	High Risk	3	Medium Risk	0	Low Risk
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_____ Interviewing Officer		_____ Supervisor											
<p>¹ Refers to those instances where the Compliance Department requests that a customer be risk rated as high where they do not satisfy any of the other risk factors included in the Form.</p> <p>² PEP positions that remain high risk after demitting office for 2 years or less: Attorney General, Board Members of the Central Bank, Cabinet Ministries, Cabinet Secretary, Chairman & Members of State Boards, Chairman of Law Reform Committee, Chairman of Regional Corporations, Chairman of The Integrity Commission, Director of Public Prosecutions, Director/Executive Director of the Caribbean Financial Action Task Force (CFATF), Governor & Deputy Governor of The Central Bank, Leader of the Opposition, Mayors, Members of Parliament, Permanent & Deputy Permanent Secretaries, President, Prime Minister, Secretary General, Caricom, Secretary/Assistant Secretary General United Nations, Foreign PEPs, Commissioner of Police (COP), Deputy Commissioner of Police, Assistant Commissioner of Police, Chief Justice, High Court Judge, Judge-Court of Appeal, Judge, Chief Magistrate, Magistrate, Master of the Court, Tax Appeal Court Judges, Chief of Defense Staff, Major General, Brigadier General, Brigadier, Chief Fire Officer, Deputy Chief Fire Officer, Commissioner of Prison, Deputy Commissioner of Prison, Assistant Commissioner of Prison.</p> <p>³ Listed Businesses: This includes Real Estate, Motor Vehicle Sales, Pool Betting, National Lotteries Online Betting Games, Jewellery, An Accountant, An Attorney at Law or other Legal Professional, An Art Dealer, Trust and Company Service Providers</p> <p>⁴ High Risk Businesses: Financial Institutions – Banks, Credit Unions, Unit Trusts, Brokerage Companies, Insurance Companies, Investment Companies, Mortgage Companies, Savings and Loan Associations etc., Money Service Businesses (MSBs)/ Money or Value Transfer Services (MVTs) Businesses, Money Lenders, Travel Agencies, Shipping Companies, Licensed Fire Arm Dealers, Embassies and Other Official Diplomatic Bodies of High Risk Countries, Offshore Banks (Refer via email to Compliance) International Business Company or International Business Corporation (IBC) (Refer via email to the Compliance Department), Third-Party Non-Bank Financial Institutions (NBFIs)</p> <p>⁵ Non-profit organisation: Non-Profit Organizations are entities that engage in raising or disbursing funds for charitable, religious, cultural, educational, social or fraternal purposes or for carrying out other types of "good works". NPOs can range from large regional, national or international charities, to community-based self-help groups. They also include research institutes, churches, clubs, and professional associations. They typically depend in whole or in part on charitable donations and voluntary service for support.</p> <p>PROHIBITED CUSTOMERS: Shell Banks; Anonymous Accounts or Accounts in Fictitious Names; Casinos / Private Members Clubs ("PMCs") and other Gaming Related Businesses; Companies that Issue Bearer Shares, Bearer Share Certificates, Share Warrants, Bearer Share Warrants; Arms Dealers, Manufacturers and Sellers of Arms and Munitions; Virtual Currencies Exchanges; Customers Engaging in the Buying and Selling of Virtual Currencies (e.g. Bitcoins, Litecoin, Ethereum); Marijuana Related Businesses; Customers Engaged in Prostitution and/or Pornography; and Companies where the Ownership Structure appears Unusual or Excessively Complex given the Nature of the Applicant/Customer's Business.</p> <p>⁶ Examples of Controlling Persons: director, corporate secretary, CEO, Chief Information Officer, COO, President, VP or any shareholder with 10% or more share ownership in a company or highest ranked officers in Clubs/ Societies/Associations/Non Governmental Organisations/ Non Profit Organisations/Charities/Trusts.</p>													