

As applicable (not all services/transactions will involve a \$ amount)

INHERENT RISK FACTORS

The data below is only for Specified Activities

As at: (state date)

For Period Ended: (state period)

1. CUSTOMER RISK (Indicate for US\$ amount either the income earned or value of transactions involved)	Number of Customers	No. of Transactions	US\$'000 Equivalent
1.1 Individuals			
a) Bermudian			
b) Non-Resident			
1.2 Legal persons & arrangements			
a) Bermudian			
b) Foreign			
1.3 PEPs			
a) Bermudian			
b) Foreign			
1.4 Clients involving complex ownership structures			
1.5 Clients that are acting on behalf of a third party (including other professional intermediaries)			
1.6 High net worth clients			
1.7 Non-profit organizations			
a) Bermudian			
b) Foreign			
1.8 Any high risk customer categories identified by the RPF			
1.9 RPF's internal risk assessment of customers (change rating scale below if necessary)			
a) Low			
b) Medium			
c) High			

2. PRODUCT & SERVICES RISK (services provided for clients)	Number of Customers	No. of Transactions	US\$'000 Equivalent
2.1 Real estate transactions			
a) Sales of real estate			
b) Purchase of real estate			
c) Transactions where real estate is held by trustees			
d) Provision of escrow accounts for clients			
2.2 Managing of financial assets (money, bank accounts, securities, etc.)			
2.3 Organizing or managing contributions for creation, operation or management of legal entities			
2.4 Creation, operation and management of legal entities			
2.5 Purchase and sale of legal entities			
2.6 Services involving (foreign) companies with bearer shares			
Other services:			
2.6 Acting as registered agent for legal entities			
2.7 Acting as nominee shareholder			
2.8 Acting as nominee director			
2.9 Acting as custodian of assets			
2.10 Acting as escrow agent (for real estate and any other purpose)			
2.11 Any high risk customer categories identified by the RPF			
2.12 RPFs internal risk assessment of products/services (change rating scale below if necessary)			
a) Low			
b) Medium			
c) High			

3. GEOGRAPHIC RISK	Number of Customers	No. of Transactions	US\$'000 Equivalent
3.1 FATF and FATF style regional bodies countries identified as having weak AML/CFT regimes			
3.2 UN sanctioned countries (including for proliferation issues)			
3.3 High money laundering countries (esp. corruption, drug trafficking, etc.)			
3.4 Countries or regions at high risk of terrorism or terrorism financing			
3.5 Other high risk countries or regions as determined by Bermuda or other countries			
3.6 RPFs internal risk assessment of products/services (change rating scale below if necessary)			
a) Low			
b) Medium			
c) High			

4. CHANNELS OF DELIVERY RISK	Number of Customers	No. of Transactions	US\$'000 Equivalent
4.1 Non-face-to-face clients taken on by firm			
4.2 Introduced clients and clients where customer due diligence is performed by others			
4.3 Business conducted over the internet (e-services)			
4.4 RPFs internal risk assessment of delivery channel (change rating scale below if necessary)			
a) Low			
b) Medium			
c) High			