



CLIENT DUE DILIGENCE FORM (“CDD FORM”) NATURAL PERSONS

Revised: June 2023

Subject Matter:		Matter No:		Date of Record:	
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1. Client Details		
English Name:	Chinese Name (if any):	Date of Birth:
ID Card / Passport No.:	Nationality:	Occupation / Business Nature:
Contact No.:	Email Address:	Fax No.:
Residential Address:		Document(s) obtained to verify proof of address: <input type="checkbox"/> Utility bill <input type="checkbox"/> Bank Statement <input type="checkbox"/> Letter from a governmental body <input type="checkbox"/> Other:
Identification document obtained to verify Client's identity:		<input type="checkbox"/> Hong Kong Permanent ID Card <input type="checkbox"/> National ID Card issued by a sovereign authority showing Nationality <input type="checkbox"/> Passport issued by a sovereign authority <input type="checkbox"/> Non-Permanent Hong Kong ID card and Passport issued by a sovereign authority <input type="checkbox"/> Other:
Nature and purpose of the transaction / legal service:		
Source of Funds (SoF) for the transaction: Where did the funds originate from (from which bank account and jurisdiction (Client's or a Third-Party)? Please specify:	What activity generated the funds? <input type="checkbox"/> Employment Income <input type="checkbox"/> Sale of real estate / business <input type="checkbox"/> Inheritance <input type="checkbox"/> Share sales/dividends <input type="checkbox"/> Pension release <input type="checkbox"/> Loan Drawdown <input type="checkbox"/> Business income <input type="checkbox"/> Rental Income <input type="checkbox"/> Savings <input type="checkbox"/> Gift <input type="checkbox"/> Sale of Asset(s) <input type="checkbox"/> Gambling winnings <input type="checkbox"/> Compensation <input type="checkbox"/> Others:	

2. Particulars of Individual Purporting to Act on Behalf of The Client		
English Name:	Chinese Name (if any):	Date of Birth:
ID Card / Passport No.:	Nationality:	Acting capacity:
Contact No.:	Email Address:	Fax No.:
Residential Address:		Correspondence Address (if different):
Identification document obtained to verify Client's Representative:		<input type="checkbox"/> Hong Kong Permanent ID Card <input type="checkbox"/> National ID Card issued by a sovereign authority showing Nationality <input type="checkbox"/> Passport issued by a sovereign authority <input type="checkbox"/> Non-Permanent Hong Kong ID card and Passport issued by a sovereign authority <input type="checkbox"/> Other:
Document(s) obtained to verify an authority to act on behalf of the Client:		<input type="checkbox"/> A Board Resolution conferring of authority on the person concerned <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Letter of Appointment <input type="checkbox"/> Estates: Death certificate <input type="checkbox"/> Grant of probate or Letter of Administration (if applicable) <input type="checkbox"/> Written confirmation from the client <input type="checkbox"/> Other:



3. Risk Assessment (Applies to Client and his / her Representative)

Is the Client, his / her Representative a designated individual subject to financial sanctions or a terrorist suspect?	Prohibited Relationship	
Is the Client, his / her Representative from, or residing in, a high-risk jurisdiction identified by the FATF?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the Client, his / her representative a PEP?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
(*After completion of the client risk assessment, consideration should be given to determine the level of Enhanced Client Due Diligence. In case of a "HK-PEP" and an "International Organisation PEP", the suggested rating may be reduced if the PEP poses a low risk taking into account risk factors set out in para 121 of the PDP).		
Is the Client's occupation / nature of business cash intensive or a high-risk?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the Client, his / her Representative intend to deposit or transfer funds from / to a Third-Party not connected to the transaction / matter?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the Client intend to use cash?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the Client intend to make multiple transfers to / from different bank accounts without apparent reason?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Will the funds be transferred from / to a high-risk jurisdiction?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the transaction value significantly above or below the market value?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is the Client, his / her Representative secretive or absent throughout, especially when he / she was not present for face-to-face identification?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Are there complex or unusual circumstances surrounding the transaction / matter which are not restricted to: <ul style="list-style-type: none"> ▪ A lack of sensible commercial, financial, tax, or other legal reason for the retainer or transaction; ▪ Size, frequency or manner of execution, in the context of Client's known business type; ▪ Client is unusually anxious to complete transaction or is unable to justify why he / she needs completion to be undertaken quickly; ▪ Client requests to hold money in client account in unusual or unnecessary circumstances, especially where the money may subsequently be paid away to a person other than the person making the deposit. 	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Overall risk rating: If you answered "Yes" to any of the above questions but the risk level is assessed as "low", please explain why the client was risk rated as "Low" or "Medium":	<input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High Level of Due Diligence: <input type="checkbox"/> Standard <input type="checkbox"/> Enhanced	

4. Enhanced Due Diligence (EDD)

Measures applied to mitigate ML /TF risk for Clients rated as "High" risk:	<input type="checkbox"/> Obtained approval from Senior Manager <input type="checkbox"/> Further verified identity of the Client by utilizing documents not previously used <input type="checkbox"/> Verified Client's Source of Funds <input type="checkbox"/> Verified Client's Source of Wealth <input type="checkbox"/> Obtained additional information to understand better the background, ownership and financial situation of the client, and other parties to the transaction to be satisfied that the transaction is consistent with the purpose and intended nature of the business relationship <input type="checkbox"/> Ensured payments made are carried out through accounts opened in the Client's name with an authorised institution or a bank operating in an equivalent jurisdiction that has measures in place to ensure compliance with the requirements similar to those imposed under Schedule 2 to the AMLO and is supervised for compliance with those requirements by a banking regulator in that jurisdiction <input type="checkbox"/> Applied enhanced monitoring to the business relationship <input type="checkbox"/> Filed an STR with the JFIU if appropriate <input type="checkbox"/> Declined to establish a business relationship with the customer <input type="checkbox"/> Terminated the business relationship as soon as reasonably practicable
Enhanced monitoring steps applied to monitor business relationship:	<input type="checkbox"/> Client's information will be kept up to date <input type="checkbox"/> Each transaction / matter will be scrutinized against client information <input type="checkbox"/> Client's' name will be screened against Sanctions / PEP / Negative News on a periodic basis <input type="checkbox"/> Other:

5. Details of the Politically Exposed Person (if applicable)

Type of PEP:	<input type="checkbox"/> Client <input type="checkbox"/> Representative <input type="checkbox"/> Close associate <input type="checkbox"/> Family Member (Spouse or Partner / Child / Parent / Child's Spouse) <input type="checkbox"/> Country/jurisdiction where the function is performed:
Details of the PEP? (Describe the nature of the prominent public function the person is or has been entrusted with as a PEP, or the nature of the person's relationship with the PEP, and PEP's relationship/connection with the Client (if Client itself is not a PEP):	Name of the Governmental or International Institution / Judiciary / Military / Political Party:
If "HK-PEP" or "International Organisation PEP", reasons for not applying EDD (if appropriate, considering factors set out in para 121 of the PDP):	
If former PEP, reasons for not applying EDD measures (if appropriate, considering factors set out in para 8, Table A of the PDP):	

6. Declaration and Approvals

I certify that the information above is correct and accurate to the best of my knowledge.

Signed by Engagement Lawyer:

Approved by Compliance Officer / Partner:

Name and Signature
Date:

Name and Signature
Date: