# Client Due Diligence Form (“CDD Form”)

# Natural PersonS

*Revised: June 2023*

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| **Subject Matter:** |  | **Matter No:** |  | **Date of Record:** |  |
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| 1. **Client Details**
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| 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:* Utility bill
* Bank Statement
* Letter from a governmental body
* Other:
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| Identification document obtained to verify Client’s identity: | * Hong Kong Permanent ID Card
* National ID Card issued by a sovereign authority showing Nationality
* Passport issued by a sovereign authority
* Non-Permanent Hong Kong ID card and Passport issued by a sovereign authority
* Other:
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| 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?* Employment Income
* Sale of real estate / business
* Inheritance
* Share sales/dividends
* Pension release
* Loan Drawdown
* Business income
 | * Rental Income
* Savings
* Gift
* Sale of Asset(s)
* Gambling winnings
* Compensation
* Others:
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| 1. **Particulars of Individual Purporting to Act on Behalf of The Client**
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| 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: | * Hong Kong Permanent ID Card
* National ID Card issued by a sovereign authority showing Nationality
* Passport issued by a sovereign authority
* Non-Permanent Hong Kong ID card and Passport issued by a sovereign authority
* Other:
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| Document(s) obtained to verify an authority to act on behalf of the Client: | * A Board Resolution conferring of authority on the person concerned
* Power of Attorney
* Letter of Appointment
* Estates: Death certificate
* Grant of probate or Letter of Administration (if applicable)
* Written confirmation from the client
* Other:
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| 1. **Risk Assessment (Applies to Client and his / her Representative)**
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| 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? | □ Yes □ No |
| Is the Client, his / her representative a PEP?(\*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).  | □ Yes\* □ No |
| Is the Client’s occupation / nature of business cash intensive or a high-risk? | □ Yes □ No |
| Does the Client, his / her Representative intend to deposit or transfer funds from / to a Third-Party not connected to the transaction / matter?  | □ Yes □ No |
| Does the Client intend to use cash?  | □ Yes □ No |
| Does the Client intend to make multiple transfers to / from different bank accounts without apparent reason?  | □ Yes □ No |
| Will the funds be transferred from / to a high-risk jurisdiction?  | □ Yes □ No |
| Is the transaction value significantly above or below the market value? | □ Yes □ No |
| Is the Client, his / her Representative secretive or absent throughout, especially when he / she was not present for face-to-face identification?  | □ Yes □ No |
| Are there complex or unusual circumstances surrounding the transaction / matter which are not restricted to: * 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.
 | □ Yes □ 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”: | □ Low □ Medium □ High |
| **Level of Due Diligence**:□ Standard □ Enhanced |

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| 1. **Enhanced Due Diligence (EDD)**
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| Measures applied to mitigate ML /TF risk for Clients rated as “High” risk: | * Obtained approval from Senior Manager
* Further verified identity of the Client by utilizing documents not previously used
* Verified Client’s Source of Funds
* Verified Client’s Source of Wealth
* 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
* 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
* Applied enhanced monitoring to the business relationship
* Filed an STR with the JFIU if appropriate
* Declined to establish a business relationship with the customer
* Terminated the business relationship as soon as reasonably practicable
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| Enhanced monitoring steps applied to monitor business relationship:  | * Client’s information will be kept up to date
* Each transaction / matter will be scrutinized against client information
* Client’s’ name will be screened against Sanctions / PEP / Negative News on a periodic basis
* Other:
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| 1. **Details of the Politically Exposed Person (if applicable)**
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| Type of PEP: | □ Client □ Representative □ Close associate □ Family Member (Spouse or Partner / Child / Parent / Child’s Spouse)□ 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): |

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| 1. **Declaration and Approvals**
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| I certify that the information above is correct and accurate to the best of my knowledge. |
| **Signed by Engagement Lawyer:** Name and SignatureDate: | **Approved by Compliance Officer / Partner:**Name and SignatureDate: |