

# CFA 2017 Firmwide Risk Assessment

<b>External Risks</b>			
<b>1 Firm Risk.</b> As a firm, we have considered the countries in which we do business and, in particular, the following questions:			
Type of Risks	Yes / No / N/A	Level of Risk (H/M/L)	Comments
1.1 Do the countries in which we do business have high levels of corruption?			
1.2 If so, do we have sufficient oversight of staff working within those countries? Please provide information on how we oversee staff working in such countries.			
<p><i>GUIDANCE:</i> The examples below are taken from the Law Society's Practice Note on the Criminal Finances Act 2017 and HMRC's Guidance of 1<sup>st</sup> September 2017 and are suggestions but are not an exhaustive list.</p> <p>The following countries <i>may</i> be considered <b>low risk</b>:</p> <ul style="list-style-type: none"> <li>• Countries identified by credible sources as having effective AML/CTF systems;</li> <li>• Countries identified by credible sources as having a low level of corruption or criminal activity.</li> </ul> <p>The following countries <i>may</i> be considered <b>high risk</b>:</p> <ul style="list-style-type: none"> <li>• Countries identified by credible sources as not having adequate Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) approaches;</li> <li>• Countries subject to sanctions, embargoes, or similar measures issued by, for example, the UN;</li> <li>• Countries identified by credible sources as providing support for terrorist activities, or that have designated terrorist organisations operating within their country.</li> </ul>			
<b>2 Practice Area and Transaction Risk.</b> The following areas <i>could</i> provide opportunities to evade tax.			