AML client due diligence checklist

Practice use only. Complete before acting for the client. Keep this record, and copies of the evidence, for at least five years after the business relationship ends.

1. Client and engagement

Client name	Client type (individual, sole trader, company, partnership, trust)
Services to be provided	Date relationship starts
How the client was introduced	Met in person? Yes / No

2. Identity and address evidence

Person	Evidence type	Reference / expiry	Verified how	Checked by / date
Photo ID				
Proof of address				
Second person (if any)				

Verified how: original seen, certified copy, or electronic verification (name the provider).

3. Companies, partnerships and trusts

Beneficial owner or person with significant control	Ownership / control %	ID verified? Yes / No

Companies House record checked (date)	Discrepancy with PSC register? Yes / No (report if yes)

4. Screening

Check	Result: clear / match	Date and source
Politically exposed person (PEP), family or close associate		
UK sanctions list		
Adverse media search		

5. Risk assessment

RISK FACTORS PRESENT	RATING AND DUE DILIGENCE
☐ Cash-intensive business	Risk rating: ☐ Low ☐ Medium ☐ High
☐ Complex or unusual ownership	Due diligence: ☐ Simplified ☐ Standard ☐ Enhanced
☐ High-risk country connection	Source of funds / wealth checked (if high risk): _____
☐ Not met in person	Reason for rating: _____
☐ PEP or sanctions match	Next review date: _____
☐ Reluctance to give information	
☐ Other: _____	

6. Approval

Completed by (name and date)	Reviewed and approved by (MLRO or partner)
Accept client? Yes / No	Date of approval

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