**Money Laundering Company Wide Risk Assessment**

**Overall Risk Assessment:** Retirement Capital is Low risk.

To supplement our AML policy and the training given to all members of staff, the Company considers it prudent to think about the risks (or potential risks) of money laundering that may affect it. As such, the Company has decided to put in place a risk assessment of the Company as a whole that will identify areas of the Company’s business that may be most exposed to money laundering and terrorist financing and how the Company will mitigate these risks.

This risk assessment was carried out by Esther Salmon the Company’s Money Laundering Reporting Officer on 15 November 2022.

In preparing this Risk Assessment, the Company has:

1. considered the size and nature of its business, i.e. [a SME business, providing a limited range of services to a small number of clients];
2. identified the key money laundering risks faced by the Company;
3. assessed the identified risks by considering the likelihood of them occurring and the resulting impact if they do occur;
4. reviewed its systems and controls in place in order to mitigate any risk and bring the level to an acceptable level;
5. reviewed its practices and file reviews and any history of reports of suspicious activity from staff; and
6. reviewed the payment policy for inbound and outbound payments
7. reviewed the identification policy in light of FCA permissions being granted.

This assessment will be reviewed annually or when necessary.

Esther Salmon

15 November 2022

**RISK ASSESSMENT**

| Risk Factor | Details | Assessment of Risk | Mitigating Actions |
| --- | --- | --- | --- |
| **Customers/Clients**  *Customers/clients may misrepresent their identity and/or use newly incorporated companies or trust structures to hide criminal proceeds.* | List the types of customers/clients that the Company has and whether they are existing or new.  Small businesses and limited companies owners in the UK | This specific risk is judged low because the customers must be uk tax registered and business must be trading companies registered at companies house.  e.g:   * No high-risk customers/clients * No politically exposed persons (PEPs) * No tax structures accepted * All existing customers/clients * Other | Standard customer due diligence performed to verify customer/client identity and business activities.  Staff training provided on AML on 31 January 2022  MLRO approves all new customers/clients.  Enhanced customer due diligence performed in relation to any customer/client that appears to be higher risk. |
| **Services**  *Services/products may be purchased using criminal proceeds to change “dirty money” into “clean money”. Criminals may use the service/product to provide credibility to their business.* | List the types of services/products that the Company provides.  e.g:   * Are all services/products being offered routine? * What is the value of the services/products being offered? | This specific risk is judged low because the services provided are those transactions limited by reference only to the activities permitted under the scheme mandate. No cash withdrawals or payments to third parties permitted. | Standard customer due diligence performed to confirm customer/client identity and business activities.  Staff training provided on AML on 15 January 2022  The Company’s records on its customers/clients are complete and up to date.  Enhanced customer due diligence is performed on any customers/clients in higher risk products/services. |
| **Transactions**  *The types of transactions that are being undertaken may be used for the purposes of money laundering. They may be overly complex, and it may not be clear where funds are coming from.* | List the types of transactions that may be undertaken.  e.g:   * Does the transaction make sense or is it overly complex given the underlying nature of the business? * Does the value of the transaction appear within the financial means of the customer/client? * Is the source of funds clear and identifiable and coming from a recognisable financial/credit institution? * Are any funds being paid by a third party? | This specific risk is judged low because only payments set out on the mandate are permissible  **Outbound Payments are limited to**  Payment of pension, death benefits to beneficial members of the Scheme.  Investment payments for holdings registered in the Scheme.  Pension transfers to approved pension providers.  Payment of incidental scheme expenses and annual administration charges.  Mortgage repayments for commercial properties registered in the name of the Scheme. The value of the transaction appears to be within the financial means of the customer/client  No cheque book facility will be offered.  **Inbound Transaction Payments are limited to:**  Employer or Employee Contributions (no third party contributions permitted).  Rental Income from Property held by the Scheme  Realisation and Dividend payments from investments registered in the name of the Scheme and tax reclaimation payments.  Pension transfers in from UK registered pension providers  The source of funds is clear and identifiable and is coming from a recognisable financial/credit institution  No funds are being paid by a third party  No cash withdrawals permitted or cash deposits. | Standard customer due diligence performed to verify customer/client identity and business activities.  Staff training provided on AML on 15/1/22  MLRO approves all new transactions. |
| **Geography**  *Customers/clients may not be local to the area or may be from outside the UK, where the potential money laundering risk is higher, particularly if they come from a high-risk jurisdiction which is a tax haven or has high levels of corruption.* | List where the customers/clients are based.  e.g:   * Are customers/clients local? * Are all customers/clients based within the UK and have no connections to other countries? * Are any funds coming from overseas? | This specific risk is judged low because  All customers/clients are based within the UK and have no tax residency connections to other countries.  No funds are coming from overseas.  Only UK SSAS permitted | Standard customer due diligence performed to verify customer/client identity and business activities.  Staff to notify MLRO if they come across connections to high risk countries. |
| **Delivery channels**  *There is a greater money laundering risk if there are no face to face meetings with customers/clients. However, this may be standard for the business, particularly for an online business.* | Insert relevant method of delivery; e.g:   * Face to face delivery * Online delivery | This specific risk is judged low because  e.g:   * Zoom Face to face meetings are carried out with all new customers/clients * Existing clients have personal relationship and are known to the director | Standard customer due diligence performed to verify customer/client identity and business activities.  **We only accept clients that we have met in person or their identity can be confirmed via zoom.** |
| **Staff**  *Dishonest members of staff may use the company’s bank account to carry out money laundering or fraud.* | List staff (or groups of staff) employed (including temporary staff and contractors) and any specific concerns.  e.g:   * Have there been any staff dismissed for dishonesty/fraud etc? | This specific risk is judged low because two step authentication process required for payments.  Robust HR policies in place.  Staff known to the firm from previous employment together | Pre-employment screening carried out on all staff.  HR policies particularly in relation to misconduct and dismissal clearly communicated to all staff. |
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