

Red Flag indicators	
<p>If the client:</p> <ul style="list-style-type: none"> • is secretive or evasive about who they are, the beneficial owner, the source of funds, the reason for the transaction, or what the big picture is • uses an intermediary, or does not appear to be directing the transaction, or appears to be disguising the real client • avoids personal contact without good reason • refuses to provide information about the transaction • has criminal associations • has unusually high level of knowledge about money laundering processes • is a PEP or subject to sanctions <p>If the parties:</p> <ul style="list-style-type: none"> • or their representatives reside in, or are incorporated in, a high-risk country (Algeria, Ecuador, Ethiopia, Indonesia, Myanmar, Pakistan, Syria, Turkey, Yemen, Iraq, Iran, and North Korea) • to the transaction are connected without an apparent business reason • have connections of a family or other business nature which causes doubts as to the real reason for the business • appear multiple times in transactions over a short period of time • executing the transaction are unusual, e.g. if they are under legal age or there is no logical explanation for their involvement are a director or representative which does not appear suitable for any reason e.g. age 	<p>If the transaction has unusual features such as:</p> <ul style="list-style-type: none"> • size, nature, frequency or manner of execution • early repayment of mortgages/loans • short repayment periods for borrowing • an excessively high value is placed on assets/securities • it is potentially loss making • involving unnecessarily complicated structures or steps in transaction • repetitive instructions involving common features/parties or back to back transactions with assets rapidly changing value • the transaction is unusual for the client, type of business or age of the business • unexplained agency, requests for short cuts or changes to the transaction particularly at the last minute • use of a Power of Attorney in unusual circumstances • no obvious commercial purpose to the transaction • instructions to retain documents or to hold money • abandoning transaction and/or requests to make payments to third parties or to back source monies passing directly between the parties
<p>If the source of funds for the transaction is unusual such as:</p> <ul style="list-style-type: none"> • large cash payments 	<p>If the instructions are unusual for your business such as:</p>

<ul style="list-style-type: none"> • unexplained payments from a third party • client doesn't appear to have the means to pay/fund the transaction according to their legitimate income source • loans from non-institutional lenders • use of corporate assets to fund private expenditure of individuals • use of multiple accounts or foreign accounts 	<ul style="list-style-type: none"> • Outside you or your firm's area of expertise or normal business, or if client is not local to you and there is no explanation as to why your locality has been chosen • willingness of client to pay high fees • unexplained changes to legal advisers • the client appears unconcerned or lacks knowledge about the transaction
<p>If there are geographical concerns such as:</p> <ul style="list-style-type: none"> • unexplained connections with and movement of monies between other jurisdictions • Connections with jurisdictions which are subject to sanctions or are suspect because drug production, terrorism or corruption is prevalent or there is a lack of money laundering regulation 	
<p>The above may indicate a reason to suspect money laundering. If present, seek more information and report if you are still uneasy or you cannot get a full answer to your concerns.</p>	