|  |  |
| --- | --- |
| **Report to the MLRO** |  |
|  |  |
| **Important**  **If you suspect money laundering or terrorist financing submit this report without delay to the firm’s MLRO. Also telephone to advise that a report is being made. Do not inform anyone else. It may be an offence to disclose that this report has been made.** | |

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Client Details** | | | | | | | | | | | |
| Name: |  | | | | | | | | DOB: | |  |
| Aliases / Trading / Business Name: | | | | |  | | | | | | |
| Address: | | |  | | | | | | | | |
|  | | |  | | | | | | Tel No: | |  |
| Evidence of identity of client / beneficial owner attached: | | |  | Yes | |  | No (provide details below) | | | | |
|  | | | | | | | | |
| Introducer (if any): | | |  | | | | | | | | |
| If beneficial owner exists who is ***not*** the client:   |  |  |  | | --- | --- | --- | | Name of beneficial owner: |  | | | Address of beneficial owner: |  | | |  | |  | | | | | | | | | | | | |
| **Information/suspicion** | | | | | | | | | | | |
| Details of transaction, (including value, source of funds, other parties, etc): | | |  | | | | | | | | |
| Reason for suspicion (continue on separate sheet as necessary): | | |  | | | | | | | | |
| Other comments: | | |  | | | | | | | | |
| **Reporter** | | | | | | | | | | | |
| Name: | |  | | | | | | Department: | |  | |
| Signed: | |  | | | | | | Date: | |  | |

|  |  |
| --- | --- |
| **To be completed by MLRO** | |
| Date/time report received: |  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Decision by MLRO** | | | | | | | | |
| Suspicious Activity Report being made to the National Crime Agency?  *See ‘Reporting Decision Flowchart’ overleaf* | |  | Yes | |  | | No | |
| If ‘No’, reason(s) for not reporting.  *e.g. privilege applies, litigation matter, no grounds for suspicion, guidance from SRA or other source.* |  | | | | | | | |
| If ‘Yes’, is consent being sought to proceed with transaction? | |  | | Yes | |  | | No |
| Action to avoid tipping off:  *For example:*   * *Fee earner and others involved advised not to tell client* * *Precautions taken to ensure record of the report is not on the matter file or other location where it may be seen by client or third parties.* |  | | | | | | | |
| Has there been any failure of the firm’s anti-money laundering systems? | |  | | Yes | |  | | No |
| If ‘Yes’, record action to prevent recurrence.  *e.g. reminder to the individual concerned, or renewed training.* |  | | | | | | | |
| Reported to the firm’s Compliance Officer for Legal Practice? | |  | | Yes | |  | | No |

|  |  |  |  |
| --- | --- | --- | --- |
| **Signed (MLRO):** |  | **Date:** |  |

**Reporting Decision Flowchart**

**NO NEED TO REPORT.**

Do we have grounds to suspect money laundering?

Does privilege apply?

NO

NO

With client’s consent report to NCA seeking a defence (consent to proceed), or cease to act.

Are we instructed to do anything that may make us guilty of a money laundering offence?

**MAKE REPORT TO NCA**.

YES

NO

YES

Are we merely (1) carrying on litigation, or (2) doing other unregulated work, not involving a transaction?

YES

NO

YES