



Public Accountancy Board

A STATUTORY BODY UNDER THE MINISTRY OF FINANCE AND THE PUBLIC SERVICE

2025 QUESTIONNAIRE FOR RISK BASED APPROACH

DATA PROTECTION WE MAY USE YOUR PERSONAL DATA FOR THE PURPOSES OF:

- Administration of your practising certificate
- Sending you publications and other communications
- Responding to enquiries and investigating complaints
- Complying with our regulatory obligations

NAME OF REGISTRANT

A. Country/Geography (3.1.1)

Are any of your clients from countries on the UN Sanctions list i.e.

	Yes	No
North Korea	<input type="checkbox"/>	<input type="checkbox"/>
Iran	<input type="checkbox"/>	<input type="checkbox"/>
Mali	<input type="checkbox"/>	<input type="checkbox"/>
South Sudan	<input type="checkbox"/>	<input type="checkbox"/>
Central African Republic	<input type="checkbox"/>	<input type="checkbox"/>
Yemen	<input type="checkbox"/>	<input type="checkbox"/>
Guinea-Bissau	<input type="checkbox"/>	<input type="checkbox"/>
Libya	<input type="checkbox"/>	<input type="checkbox"/>
Eritrea	<input type="checkbox"/>	<input type="checkbox"/>
Lebanon	<input type="checkbox"/>	<input type="checkbox"/>
ISIL (Da'esh)	<input type="checkbox"/>	<input type="checkbox"/>
Al-Qaida and the Taliban	<input type="checkbox"/>	<input type="checkbox"/>
Democratic Republic of the Congo	<input type="checkbox"/>	<input type="checkbox"/>
Sudan	<input type="checkbox"/>	<input type="checkbox"/>
Somalia	<input type="checkbox"/>	<input type="checkbox"/>
Iraq	<input type="checkbox"/>	<input type="checkbox"/>

B. Client Risk (3.1.2)

(a) Describe the mix of your Client Base?

(b) Does any of your clients involve Politically Exposed Persons (PEP's) and or persons closely associated with or related to?

Foreign PEPs are individuals who are or have been entrusted with prominent public functions by a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials.

Domestic PEPs are individuals who are or have been entrusted domestically with prominent public functions, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations, important political party officials. Persons who are or have been entrusted with a prominent function by an international organisation refers to members of senior management, i.e. directors, deputy directors and members of the board or equivalent functions.

The definition of PEPs is not intended to cover middle ranking or more junior individuals in the foregoing categories.

(c) Indicate generally your clients' source of funds or source of wealth.

N.B. Understanding source of wealth is about taking reasonable steps to satisfy oneself that the funds to be used in a transaction are not the proceeds of crime.

Registrants are to satisfy themselves that adequate information is available to assess a client's source of funds and sources of wealth as legitimate with a degree of certainty that is proportionate to the risk profile of the client.

(d) Has any client been conducting his or her business relationship or requesting services in unusual or unconventional circumstances.

(e) Does the structure or nature of the entity or relationship of any client make it difficult to identify in a timely manner the true beneficial owner or controlling interest or does your client attempt to obscure understanding of his or her business and the ownership or the nature of the transactions?

(f) Do your clients' entity operate a considerable part of their businesses in or have major subsidiaries in countries that may have higher geographic risks?

(g) Is your clients' business one that is cash intensive?

(h) Is your clients' business one, that while normally cash intensive, appears to have substantial amounts of cash?

SIGNATURE.....

Date Completed.....

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