



THE LAW SOCIETY
OF SINGAPORE

PREVENTION OF MONEY LAUNDERING, FINANCING OF TERRORISM AND PROLIFERATION FINANCING

SAMPLE FIRM WIDE RISK ASSESSMENT TEMPLATE

Date: 6 October 2025

Introduction

This sample firm wide risk assessment template ("**Sample FWRA**") is designed to assist legal practitioners and law practices in their compliance with the Legal Profession Act 1966 ("**LPA**"), Legal Profession (Prevention of Money Laundering, Financing of Terrorism and Proliferation Financing) Rules 2015 ("**Rules**")¹ and the Council's Practice Direction 3.2.1 on Prevention of Money Laundering, Financing of Terrorism and Proliferation Financing ("**PD 3.2.1**"). A reference to a "Rule" or "Rules" is a reference to the Rules.

This Sample FWRA is provided for reference only. It is not intended to be used as a comprehensive or exhaustive guide. It should not be relied upon as the sole resource for compliance or practice management.

Legal practitioners and law practices should carefully review and adapt this template to suit their specific requirements, obligations, and professional standards. The ultimate responsibility and accountability for ensuring compliance with the Rules rests with legal practitioners and law practices.

¹ As amended by the Legal Profession (Prevention of Money Laundering and Financing of Terrorism (Amendment) Rules 2025, which came into operation on 1 July 2025.

Firm Wide Risk Assessment

Risk	Your risk rating (before mitigation): Low/Moderate/High/ Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/ Not applicable	Departments to which this risk applies
A. Clients (Rule 18(2)(a))(i))					
Clients from cash-intensive/ risky sectors, businesses or countries		<ul style="list-style-type: none"> State the number/percentage of individual clients from outside Singapore which are potential risks (if any). State the number/percentage of clients from the FATF blacklist countries (if any). 	<ul style="list-style-type: none"> Perform CDD on clients Source of Funds Perform ECDD on clients 		
Clients seeking anonymity or who cannot prove their identity		<ul style="list-style-type: none"> State whether the law practice accepts instructions from clients seeking anonymity. 			
Politically Exposed Persons		<ul style="list-style-type: none"> State the frequency that the law practice is instructed by PEPs. State whether such PEPs present a significant risk. 	<ul style="list-style-type: none"> Perform ECDD on clients Source of Funds 		

Risk	Your risk rating (before mitigation): Low/Moderate/High/Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/Not applicable	Departments to which this risk applies
B. Countries/ territories/ jurisdictions (Rule 18(2)(a)(ii))					
Clients/client's offices					
High-risk countries					
C. Products and Services (Rule 18(2)(a)(iii))					
Creating/managing trusts		<ul style="list-style-type: none"> State whether the law practice carries out trusts work and, if so, for what types of clients. 	<ul style="list-style-type: none"> Perform CDD on clients. Source of Funds. 		
Creating/managing companies		<ul style="list-style-type: none"> State whether the law practice creates/manages companies, for instance, in connection with corporate work. 	<ul style="list-style-type: none"> Perform CDD on clients. Identification and verification of BO. 		
Services involving nominees		<ul style="list-style-type: none"> State whether the law practice provides nominee services. 			
Client Accounts		<ul style="list-style-type: none"> State any identified risks (including escrow arrangements, if any). State what the law practice allows its client account to be used for. 	<ul style="list-style-type: none"> Identify specific transactions involving the use of the client account in high-risk areas. State specific mitigation steps taken for such transactions. 		

Risk	Your risk rating (before mitigation): Low/Moderate/ High/Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/ Not applicable	Departments to which this risk applies
Conveyancing/Real Estate		<ul style="list-style-type: none"> State whether the law practice has High Net Worth Clients with high value purchases that are repeated. 	<ul style="list-style-type: none"> Perform CDD on clients. Source of Funds, especially if purchase is not bank financed. Unusual cases are referred to Compliance Partner, and if necessary STR lodged. 		
Litigation		<ul style="list-style-type: none"> State whether the law practice has received instructions which appear to be sham. 	<ul style="list-style-type: none"> Make STR. Do not permit funds to be passed through the law practice's accounts without verifying identity of payor and payee. 		
Tax Mitigation Strategies		<ul style="list-style-type: none"> State whether the law practice provides tax advisory services. 	<ul style="list-style-type: none"> Perform CDD or ECDD on client where necessary. Source of Funds. 		
Managing Clients Assets		<ul style="list-style-type: none"> State whether the law practice provides this service. 	<ul style="list-style-type: none"> Perform CDD or ECDD on client where necessary. Source of Funds. Source of Wealth. 		

Risk	Your risk rating (before mitigation): Low/Moderate/High/Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/Not applicable	Departments to which this risk applies
D. Transactions (Rule 18(2)(a)(iii))					
Large and valuable transactions (> S\$1m)		<ul style="list-style-type: none"> State whether it is usual for the law practice to act in high value transactions for its known clients. 	<ul style="list-style-type: none"> Perform CDD on client. Source of Funds. 		
Size Large (> 30 lawyers)		<ul style="list-style-type: none"> State whether the law practice has implemented risk assessments and policies. 	<ul style="list-style-type: none"> Individual lawyers are responsible for risk assessment. Training for lawyers and staff. 		
Cash and electronic money		<ul style="list-style-type: none"> State the usual mode(s) of payment to the law practice. State whether the law practice acts as an escrow agent. 	<ul style="list-style-type: none"> State how the law practice deals with cash transaction(s) of \$20,000 or more. 		
Transactions that don't fit with your firm or client's normal pattern		<ul style="list-style-type: none"> State whether there are any transactions that don't fall within the law practice's normal pattern. 	<ul style="list-style-type: none"> Perform CDD of client. Source of Funds. 		

Risk	Your risk rating (before mitigation): Low/Moderate/ High/Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/ Not applicable	Departments to which this risk applies
Complex transactions		<ul style="list-style-type: none"> State whether the law practice acts in complex transactions and, if so, the type of risks identified. 	<ul style="list-style-type: none"> Perform CDD on client. Source of Funds. 		
Transactions or products that facilitate anonymity		<ul style="list-style-type: none"> State whether the law practice offers products that facilitate anonymity. 	<ul style="list-style-type: none"> Identification and verification of client and BO (if there is a BO). 		
Accepting funds from alternative funding platforms e.g. crowdfunding or cryptocurrency		<ul style="list-style-type: none"> State whether the law practice accepts funds from alternative funding platforms. 	<ul style="list-style-type: none"> Perform CDD and ECDD on client. Source of Funds. 		
Sending/receiving funds to third parties or overseas		<ul style="list-style-type: none"> State whether the law practice sends/receives funds to third parties or overseas. 	<ul style="list-style-type: none"> Identification and verification of third party and all involved parties. Perform CDD on third party. 		
E. Delivery Channels (Rule 18(2)(a)(iii))					
Non face-to-face (e.g. video calls, via mobile apps or online portals, remotely)		<ul style="list-style-type: none"> State whether this is the usual delivery channel of the law practice. 	<ul style="list-style-type: none"> Identification and verification of client. Additional verification measures (eg. SingPass). Perform CDD on client. 		

Risk	Your risk rating (before mitigation): Low/Moderate/High/Not applicable	Description of Risks	What do you do to mitigate this?	Your risk rating (after mitigation): Low/Moderate/High/Not applicable	Departments to which this risk applies
Face-to-face		<ul style="list-style-type: none"> State whether this is the usual delivery channel of the law practice. 	<ul style="list-style-type: none"> Identification and verification of client. 		
Through intermediary		<ul style="list-style-type: none"> State who the law practice receives instructions from. 	<ul style="list-style-type: none"> Identification and verification of intermediary. Perform CDD on intermediary. 		
F. Other identified risks (Insert below other risks you considered).					
E.g. Monies being received before full CDD being completed		<ul style="list-style-type: none"> State whether the law practice has any pre-transaction risk assessments. State purpose of transaction and who the law practice received the monies from. State reason why the monies have to be given before full CDD is completed. 	<ul style="list-style-type: none"> Complete CDD without delay. If Rule 15 applies, terminate the engagement, return any funds received and cease the transaction. Make STR if necessary. 		