

**** Confidential – Internal Bank Use Only ****
Commercial CDD Risk Assessment: Customer

Risk Factors	High Risk = 3	Moderate Risk = 2	Low Risk = 1	Risk Rating
1. Time owned or managed the business	≤ 1 year	> 1 yr & < 3 yrs	≥ 3 years	
2. Agent of another entity?	No, not for <u>any</u> of their services.	Yes, for <u>part</u> of their services.	Yes, for <u>all</u> of their services.	
3. USA market area	Multi-state area	Statewide market	Local counties only	
4. Customer demographics	International customers in or from high risk areas	International customers not in or from high risk areas	Primarily citizens of the USA	
5. NAICS Code	Included in the list of high risk NAICS Codes	Included in list of moderate risk NAICS Codes	Not a high or moderate risk NAICS Code	
6. Number of owned business locations	> 5	2 to 5	1	
7. Number of bank branches to be used	> 3	2 or 3	1	
8. Business proximity to our bank offices	Out of market	Out of market generally but seasonal proximity	In our market	
9. Number of agent or franchise locations operating under agreement with the commercial customer.	> 3	1 to 3	0	
10. Number of domestic owned offices or agent offices located in US HIDTAs or HIFCAs	> 3	1 to 3	0	
11. Any of the business offices located internationally?	Yes		No	
12. Valid State license(s) that has not expired	Not licensed and not in process	Has the 2 or more licenses required	Has only the 1 required license	
13. List the risk factor of each service used by the MSB customer in the space provided below. Total the service factors and note the sum in the far right column titled "Risk Rating."	Currency deposits or withdrawals = 1 Check deposits = 1 US currency exchanges = 2 International currency exchanges = 3 US wire transfers = 2 International wire transfers = 3 Receipt of ACH transactions = 1 Receipt of ACH IAT transactions = 1 Origination of ACH transactions = 2 Internet banking services = 3 Remote deposit capture (RDC) services = 3 Privately-owned ATMs = 3 Nondeposit investment transactions = 2 Frequent purchase of official checks, travelers checks or other negotiable instruments = 2 Safe deposit services with weekly access = 3 Safe deposit services with monthly access = 2 Safe deposit services with quarterly or less access = 1 Other, please describe and rate 1, 2 or 3 appropriately: _____ _____			
RISK RATING TOTAL				
Low Risk – 25 or less Moderate Risk = 26 to 43 High Risk = 44 or higher				

Completed by _____ Date _____