

PART D – TRIGGER EVENTS REQUIRING REASSESSMENT

Referencing CSS AML/ATF Risk Assessment Manual



A trigger event occurs when new information or circumstances materially change the Firm's understanding of the client, the engagement, or the associated ML/TF risk.



Changes in Ownership



Changes in Beneficial Ownership



Significant Changes in Business Activities



Requests for Additional Services



Foreign Expansion or International Activities



Adverse Media or Reputational Concerns



Sanctions Related Concerns



PEP /HIO Status Changes



Source of Funds Concerns



Unusual Transactions or Activity



Monitoring Concerns



Any Circumstances that Materially Changes Client Engagement



KEY PRINCIPLE

A Trigger Event Does Not Automatically Mean a Risk Rating Change

The purpose of reassessment is to determine whether the event changes the client's risk profile and whether additional due diligence, enhanced monitoring, or escalation is appropriate.

Professional judgment should be exercised and all decisions should be documented.