LAW SOCIETY OF KENYA

MONEY LAUNDERING AND TERRORISM FINANCING (ML/TF) RISK ASSESSMENT QUESTIONNAIRE FOR LEGAL PROFESSIONALS

INSTRUCTIONS

The Questionnaire is issued under Section 24A of POCAMLA and is designed to gather information from all **legal professionals in Law Firms** registered and operating within the Republic of Kenya. This information will assist in assessing the ML/TF risks associated with the sector and the effectiveness of the AML/CFT controls in place to manage and mitigate those risks.

Kindly complete **ALL** sections and submit the questionnaire to MLRO@lsk.or.ke in PDF format. Name the files as follows: **ML-TF Questionnaire - Name of Law Firm - 2026**. For example, if the name of the Law firm is *XYZ and Co. Advocates*, the file should be named as **ML-TF Questionnaire - XYZ and Co. Advocates - 2026**.

The Society would appreciate your honest responses. The Society may interrogate the authenticity of the responses submitted.

TAKE NOTE that ML/TF risk assessment is a legal requirement provided under Regulation 7 of the Proceeds of Crime and Anti-Money Laundering Regulations, 2023 and failure of the firm to correctly fill out and submit this questionnaire within the set deadline is an offense that attracts remedial actions, including sanctions.

Kindly fill out all sections of this Questionnaire using the data for the year 2025.

Any queries on the Questionnaire may be addressed to the Society through MLRO@lsk.or.ke

I. GENERAL INFORMATION

1. Name of Law Firm:	
2. Name(s) of Managing Partner:	
3. Name of Compliance Officer: *This could be a designated partner officially appointed by the firm dedicated to spearhead AML/CFT/CPF within the firm and undertake obligations outlined under Regulation 10 of POCAMLA Regulations.*	

II. FIRM STRUCTURE AND FINANCIAL FACTORS

1. STRUCTURE:	**Number** *(Approximate)*
1.1 Offices and affiliates:	
i) No. of Kenyan offices (branches)	
ii) No. of International affiliates	
iii) Name of affiliates & their country of origin	
iv) Describe your ownership and Beneficial Ownerships including your relationship to affiliates and other licensed entities	
1.2 No. of partners:	
a) Kenyan	
b) Foreign	
1.3 Years in operation in Kenya	
1.4 Number of employees (including professionals):	
i) Advocates	
ii) Other staff	
1.5 Number of Suspicious Transaction Reports (STRs) reported to FRC or LSK in the last year:	
2. FINANCIAL INFORMATION (Indicate value in Kshs.)	
ITEM	
2.1 Total assets as at 31st December 2025	
2.2 Total gross revenue for 2025	
3. FORM OF BUSINESS ORGANIZATION	
3.1. Limited Liability Partnership (LLP)	
3.2. Partnership	
3.3. Sole Practitioner	
3.4. Others (specify) …………………………………	
4. Does your firm take on new clients or engagements that require legal services of either preparing or carrying out transactions for a client concerning the following activities? **(Answer Yes/No)**	
4.1. Buying and selling of real estate;	
4.2. Managing of client money, securities or other assets;	
4.3. Management of bank, savings or securities accounts;	
4.4. Organization of contributions for the creation, operation or management of companies;	
4.5. Creation, operation or management of legal persons or arrangements;	
4.6. Buying and selling of business entities;	
4.7. Acting as registered agent for legal entities;	
4.8. Acting as nominee shareholder;	
4.9. Acting as nominee director;	

4.10 Acting as custodian of assets;	
4.10. Acting as escrow agent (for real estate and any other purpose)	
5. List any other services/activities offered to the clients by your firm	

III. INHERENT RISK FACTORS

1. CLIENT RISK	**Number of clients** *(Approximate)*	**No. of Transactions** *(Approximate)*	**Total Amount in KES.** *(Approximate)*
Identify the type of clients that you interact with			
1.1 Clients that are Natural Persons			
a) Kenyan and Kenyan residents			
b) Non-Resident from jurisdictions that are not high risk			
c) Non-residents from high-risk jurisdictions (listed by FATF or United Nations sanctions lists)			
1.2 Clients that are legal persons & arrangements			
a) Kenyan and Kenya residents			
b) Foreign from jurisdictions that are not high risk			
c) Non-residents from high risk jurisdictions (listed by FATF or United Nations sanctions lists)			
1.3 Clients that are Politically Exposed Persons (PEPs)			
a) Kenyan PEP			
b) Foreign PEP			
c) PEPs from international organizations			
1.4 Clients involving complex ownership structures			
1.5 Clients that are acting on behalf of a third party (including other professional intermediaries)			
1.6 High net worth clients			
1.7 Non-profit organizations that are registered or headquartered in:			
a) Kenya			
b) Foreign jurisdictions that are not high risk			

c) Non-residents from high risk jurisdictions (listed by FATF or United Nations sanctions lists)			
1.8 Any high risk clients categories identified by the Law Firm.			
2. PRODUCTS, SERVICES AND TRANSACTION RISK (services provided for clients)	**Number of clients** *(Approximate)*	**No. of Transactions** *(Approximate)*	**Total Amount in KES.** *(Approximate)*
Identify which services and activities your firm is involved in			
2.1 Real estate transactions			
2.2 Managing of financial assets (money, bank accounts, securities, etc.) - excluding liquidations			
2.3 Organizing contributions for the creation of legal entities (e.g. capital related to the formation of a corporation, does not include accounting fees)			
2.4 Organizing or managing contributions for the operation or management of legal entities (e.g. conducting financial transactions on behalf of the client)			
2.5 Creation, operation and management of legal entities			
2.6 Purchase and sale of legal entities			
Other services:			
2.7 Acting as registered agent for legal entities			
2.8 Acting as nominee shareholder			
2.9 Acting as nominee director			
2.10 Acting as custodian of assets			
2.11 Acting as escrow agent (for real estate and any other purpose)			
2.12 Cash transactions			
2.13 Any other services/products identified by the accounting firm			
3. GEOGRAPHIC RISK			
Identify the countries where you do business on behalf of your clients.			
Name of the Country	**Number of clients** *(Approximate)*	**No. of Transactions** *(Approximate)*	**Total Amount in KES.** *(Approximate)*
3.1 Kenya			

3.2 Countries identified by FATF and FATF style regional bodies as having weak AML/CFT regimes *List countries:*			
3.3 UN sanctioned countries (including for proliferation issues) *List countries:*			
3.4 Countries or regions at high risk of terrorism or terrorism financing *List countries:*			
3.5 High risk money laundering countries (esp. corruption, drug trafficking, etc.) *List countries:*			
3.6 High risk countries or regions as determined by Kenya or other countries *List countries:*			
3.7 Countries designated as high risk by your firm. *List countries:*			
3.8 If others, *list the countries:*			

4. CHANNELS OF DELIVERY RISK	Number of client *(Approximate)*	No. of Transactions *(Approximate)*	Total Amount in KES. *(Approximate)*
4.1 Face-to-face clients taken on by firm			
4.2 Non-face-to-face clients taken on by firm			
4.3 Introduced clients and clients where customer due diligence is performed by others (e.g. clients introduced by affiliate)			
4.4 Business conducted over the internet (e-services) or phone			

5. ADEQUACY OF PREVENTIVE MEASURES	Yes	No	Remarks
5.1. Have you appointed a money laundering reporting officer (compliance officer)?			
5.2. Have you developed AML/CFT internal controls or policies?			
5.3. Have you identified and assessed the ML/TF risks related to your activities?			
5.4. Have you implemented customer due diligence measures (including client identification)?			

5.5. Have you organized training for your employees related to AML/CFT risks and obligations?			We are currently preparing a Training Schedule on this, subject to approval from Management.
5.6. Do you apply enhanced due diligence measures to clients from high-risk countries?			
5.7. Do you maintain CDD and transaction records?			
5.8. Have you established mechanisms to identify suspicious transactions/activities?			
5.9. Have you conducted an independent review of your internal controls and policies?			
5.10 Do you identify clients who are PEPs or related to PEPs & apply enhanced due diligence measures?			
5.11 Do identify and verify Beneficial Owners for clients who are Legal Persons and Legal Arrangements?			
5.12 Do you screen new clients against sanction lists and conduct ongoing monitoring of the existing clients when there are changes to sanctions lists?			

IV. DECLARATION

I hereby certify and declare to the best of our knowledge; the information provided in this questionnaire is accurate and complete.	
NAME	
Designation:	
P105 No.	
Telephone:	
E-mail:	
Date:	
Signature:	

Submit the duly filled form to mlro@lsk.or.ke