# AML Risk Assessment and TRS Position Statement

## Section 1: Trustees and Beneficiaries are the Same

This Trust has been established as a private domestic arrangement, where the Trustees and Beneficiaries are the same individuals. In line with the exemption outlined in HMRC guidance (Code 3.050), the Trustees have determined that this Trust is not required to register under the Trust Registration Service (TRS).

The Trustees have conducted an internal risk assessment and concluded that the Trust is low risk in accordance with the Joint Money Laundering Steering Group (JMLSG) guidance. This is due to the following factors:

- Is the trust domestic and non-commercial? ✅ Yes

- Are all assets UK-based? ✅ Yes

- Are trustees and beneficiaries the same persons? ✅ Yes

- Is there any offshore connection? ❌ No

- Are distributions regular or business-related? ❌ No

- Is the trust taxable? ❌ No

- Has the trust been created for personal/family protection? ✅ Yes

On the basis of this risk profile and exemption criteria, the Trustees have elected not to register this trust with the TRS. This position is reviewed periodically or upon any material change in the trust structure or legal requirements.

## Section 2: Trustees and Beneficiaries are Not the Same

This Trust is a private, non-taxable domestic arrangement established for asset protection, succession planning, or stewardship. Although the Trustees and Beneficiaries are not the same individuals, the Trustees have conducted a formal risk assessment to evaluate the registration requirements under the Trust Registration Service (TRS).

After careful consideration of privacy, proportionality, and the nature of the Trust’s activity and assets, the Trustees have determined the Trust remains low-risk under the JMLSG guidance and thus does not meet the intended scope of TRS registration. This decision was based on the following:

- Is the trust domestic and non-commercial? ✅ Yes

- Are all assets UK-based? ✅ Yes

- Do the trustees act independently of the beneficiaries? ✅ Yes

- Is the trust set up for family/personal use only? ✅ Yes

- Is the trust taxable? ❌ No

- Are there any offshore accounts or connections? ❌ No

- Does the trust carry out business or professional services? ❌ No

- Are there any third-party investors or obligations? ❌ No

This risk assessment has been recorded to demonstrate proportional compliance with the spirit of the TRS framework while maintaining the privacy and confidentiality of the parties involved. The Trustees commit to reassessing this position annually or in response to any change in legislation or structure.