

# 金禧國際證券(香港)有限公司

香港銅鑼灣時代廣場一座 45樓

可從事證券及期貨條例項下第 1及2 類受規管活動的持牌法團

If you answer “no” to any question except No. 2, additional information can be supplied at the end of the questionnaire. 除了第二題外。如有任何一條問題的答案是“否”敬請在本問卷最後部份補充資料欄位處提出說明。

AML Questionnaire 防止洗錢問卷調查		
<b>I. General AML Policies</b> 一般的防止洗錢的政策:		
	YES 是	NO 否
1. Has your regulator published guidance notes/policies/laws to combat money laundering/terrorist financing, and is the FI subjected to, and fully complied with such laws? 金融機構的監管機關是否發出指引/政策/法律，以打擊洗錢/恐怖份子融資，而金融機構是完全符合相關法律規定?		
2. Has the FI been subjected to sanctions or punitive actions in relation to anti-money laundering/anti-terrorist financing by regulators/law enforcer in the past five years? 在過去的五年，金融機構是否受到監管機構/執法者有關防止洗錢/反恐怖份子融資的制裁或懲罰性的行動?		
3. Is the AML program approved by the FI’s board or a senior committee? 防止洗錢計劃是否已取得金融機構董事會或高層委員會的批核?		
4. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions? 金融機構是否有訂定具體書面政策，記錄其已實施的程序，以防止、偵測及報告可疑交易活動?		
5. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? 除了政府監管/主管機關的審查，金融機構是否設有一個內部稽核部門，或者委任其它獨立第三者，定期性地評估防止洗錢政策及處理規章?		
6. Does the FI have a policy prohibiting accounts/relationships with fictitious clients/shell banks? 金融機構是否有政策禁止為虛假客戶及空殼銀行開立帳戶及建立業務關係?		
7. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of fictitious clients through any of its accounts or products? 金融機構是否有制訂政策以合理地確保它不會與虛假客戶或其代表作任何金融上的交易活動?		
8. Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates? 金融機構是否有制訂政策以規範與高度涉入政治人士，其家庭成員和緊密關係的夥伴?		
9. Does the FI have record retention policies/procedures that comply with applicable law? 金融機構是否依法律規定而制訂適當的文件保存年限政策作業準則?		
<b>II. Know Your Customer and Due Diligence</b> 瞭解您的客戶及客戶審查工作:		
	YES 是	NO 否
10. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions 金融機構是否有訂定鑒別客戶身分的辦法，透過在開設帳戶及進行交易時取得客戶資訊?		
11. Does the FI assess its FI customers’ AML policies or practices? 金融機構有否評估其金融機構客戶的防洗錢政策及處理規章?		
12. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? 金融機構，當有需要時，是否有制訂辦法一再審核，更新高風險客戶的資料?		
13. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information? 金融機構是否有作業準則建立每個新客戶的檔案，記錄在開設帳戶時所蒐集的身分證明文件及KYC資訊?		
14. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? 金融機構是否根據其對客戶的風險評估來瞭解其客戶的正常及預期中的交易活動?		

15. Does the FI have a requirement to collect information regarding the customers' tax residency and tax compliance status (including FATCA or CRS)? 金融機構是否有要求蒐集關於客戶繳納當地稅務及稅務合規狀況的資料(包括FATCA 或 CRS)?		
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<b>III. Prevention and Detection of Transactions with Illegally Obtained Funds</b> <b>防止及偵察透過非法取得的資金進行的交易活動:</b>	<b>YES 是</b>	<b>NO 否</b>
16. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? 對於某些需要向主管機關報告的交易金融機構是否有制訂政策或處理規章以鑑別及呈告此等交易?		
17. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? 對於某些刻意做出的調整以迴避需呈報的大額現金交易金融機構是否有作業準則進行辨別?		
18. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? 金融機構有否檢視經政府/國際組織公布高風險名單中的個別人士/機構或國家，審查有關客戶和其交易?		

<b>IV. Transaction Monitoring</b> <b>交易監控:</b>	<b>YES 是</b>	<b>NO 否</b>
19. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and stocks transfers etc? 金融機構是否有監控規章，用於監控某些不尋常及潛在可疑的交易，如資金轉移及股票轉移等?		

<b>V. Staff Training</b> <b>員工培訓</b>	<b>YES 是</b>	<b>NO 否</b>
20. Does the FI establish employee training program of preventing anti-money laundering transactions and to assist the employees in identifying suspicious activities? 金融機構是否設立了預防洗錢交易的員工培訓專案以說明員工識別可疑交易活動? If yes, who receives training and how frequently? 若是，培訓對象是誰？多久培訓一次？		
21. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees 對於現有防止洗錢政策 或處理規章的改變及新法規，金融機構是否有制訂政策向其相關員工作 宣導溝通?		

<b>Space for additional information 請在下列空白欄位填上補充資料:</b> (Please indicate which question the information is referring to 請註明補充資料相關問題的題號)
<b>Company Name:</b> 公司名稱
<b>Title:</b> 職稱
<b>Signature:</b> 簽署
<b>Date:</b> 填寫日期