

AML SYSTEM FOR CSA

An Introduction

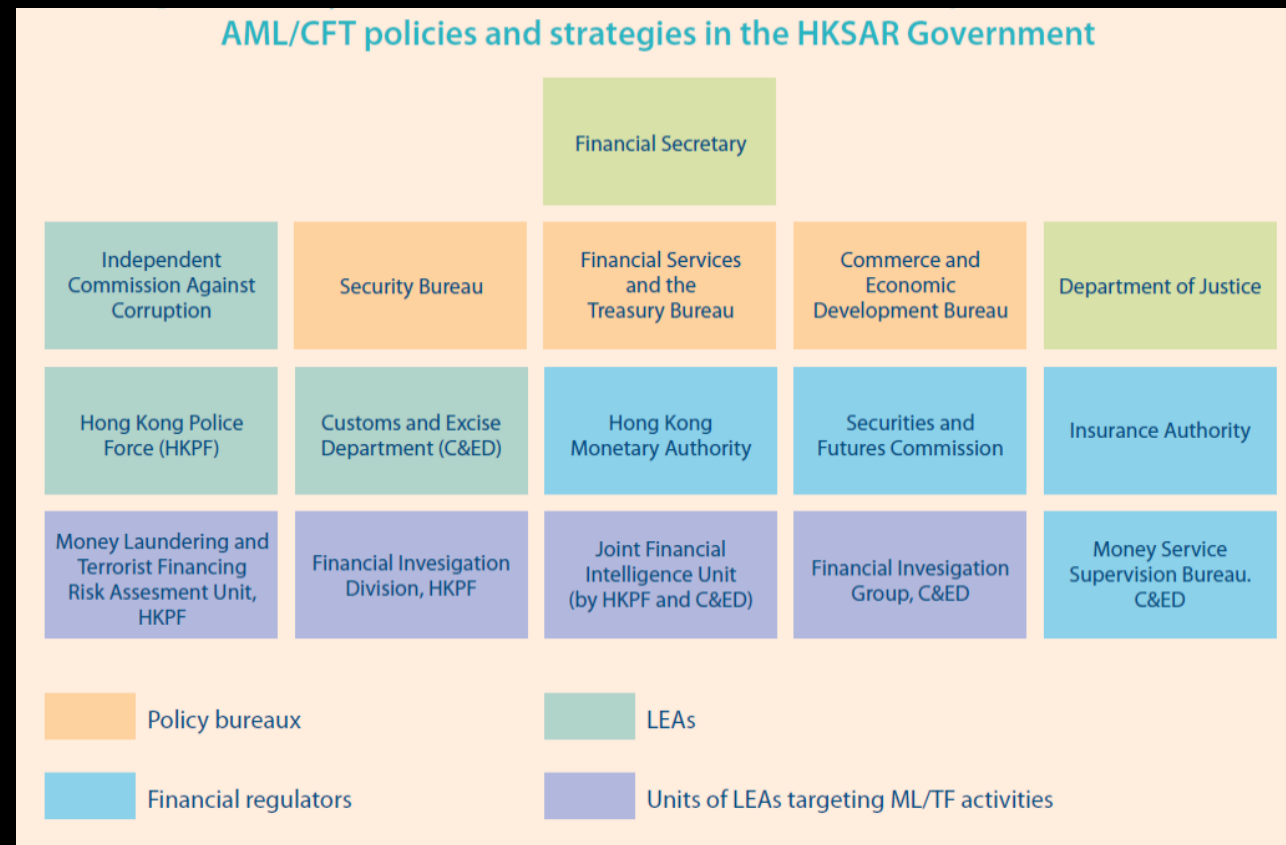


WHY DO WE NEED TO DO AML/CFT?

- Hong Kong as a Tax Haven
- FATF 1989
- 40 Recommendation 1990
- From Bank, FI, Insurance, Real Estate to DNFBPs
- The **Customer Due Diligence** and **Record-keeping** (R10, R11, R12, R15,R17)



HKSAR CCC



OBJECTIVES

- Fulfill international AML/CFT standards
- Deters and detect illicit fund flows in and out – R32 Ordinance
- Combats ML/TF, restrains, confiscates illicit proceeds
- Reduce ML/TF vulnerabilities of financial and non-financial sectors
- Adopt RBA in applying compliance obligations
- Promote awareness in combating ML/TF risks



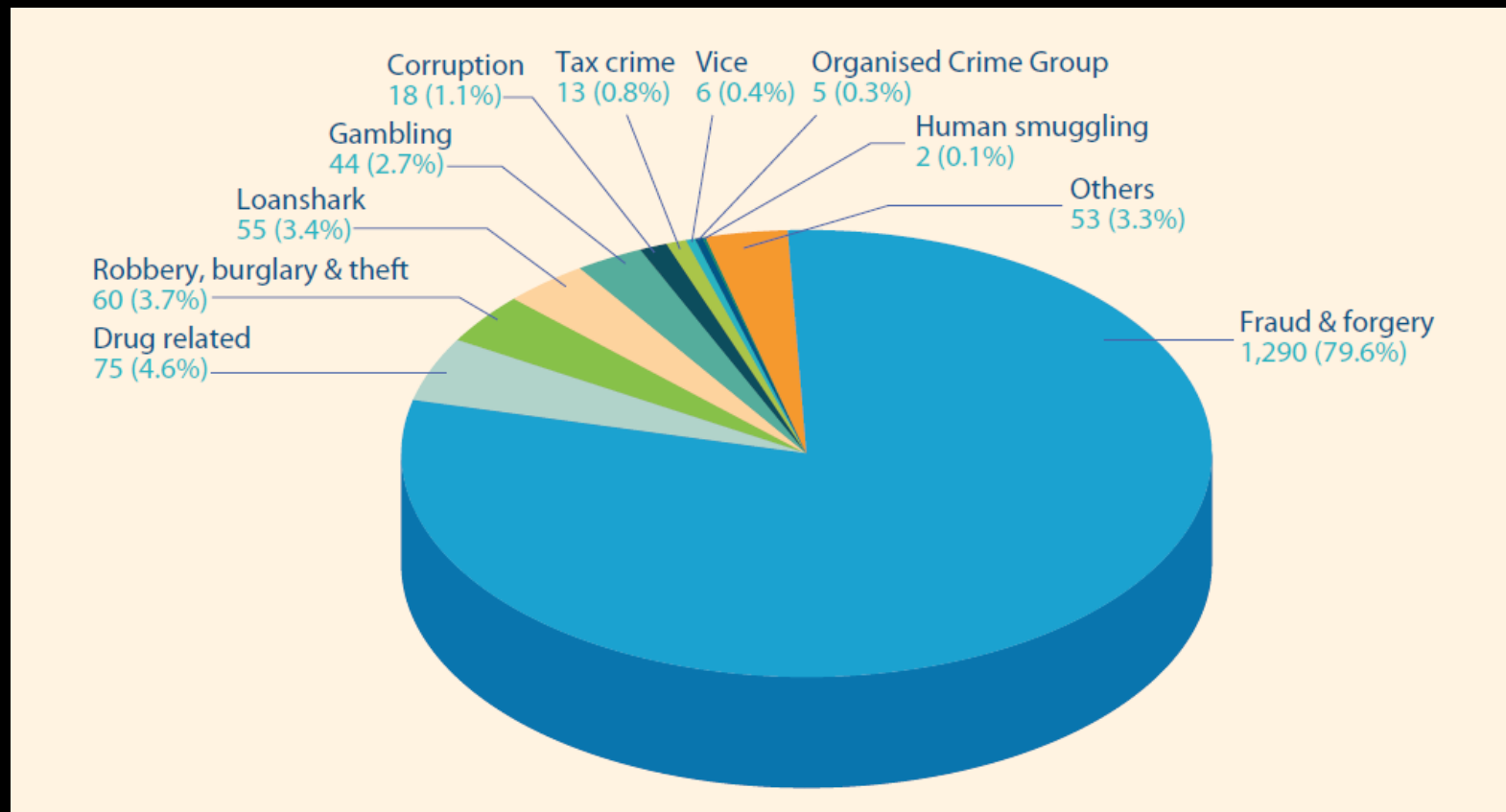
DNFBP RISKY SITUATIONS

Trust and company service providers

1. acting as a **formation** agent of legal persons;
2. acting as (or arranging for another person to act as) a director or **secretary** of a company, a partner of a partnership, or a similar position in relation to other legal persons;
3. providing a **registered office**, business address or accommodation, correspondence or administrative address for a company, a partnership or any other legal person or arrangement;
4. acting as (or arranging for another person to act as) a **trustee** of an express trust or performing the equivalent function for another form of legal arrangement;
5. acting as (or arranging for another person to act as) a **nominee** shareholder for another person.
6. to report **suspicious transactions** for a client when, on behalf of or for a client, they engage in a transaction in relation to the activities referred to in paragraph (e) of Recommendation 22.



BREAK DOWN OF MONEY LAUNDERING CRIMES

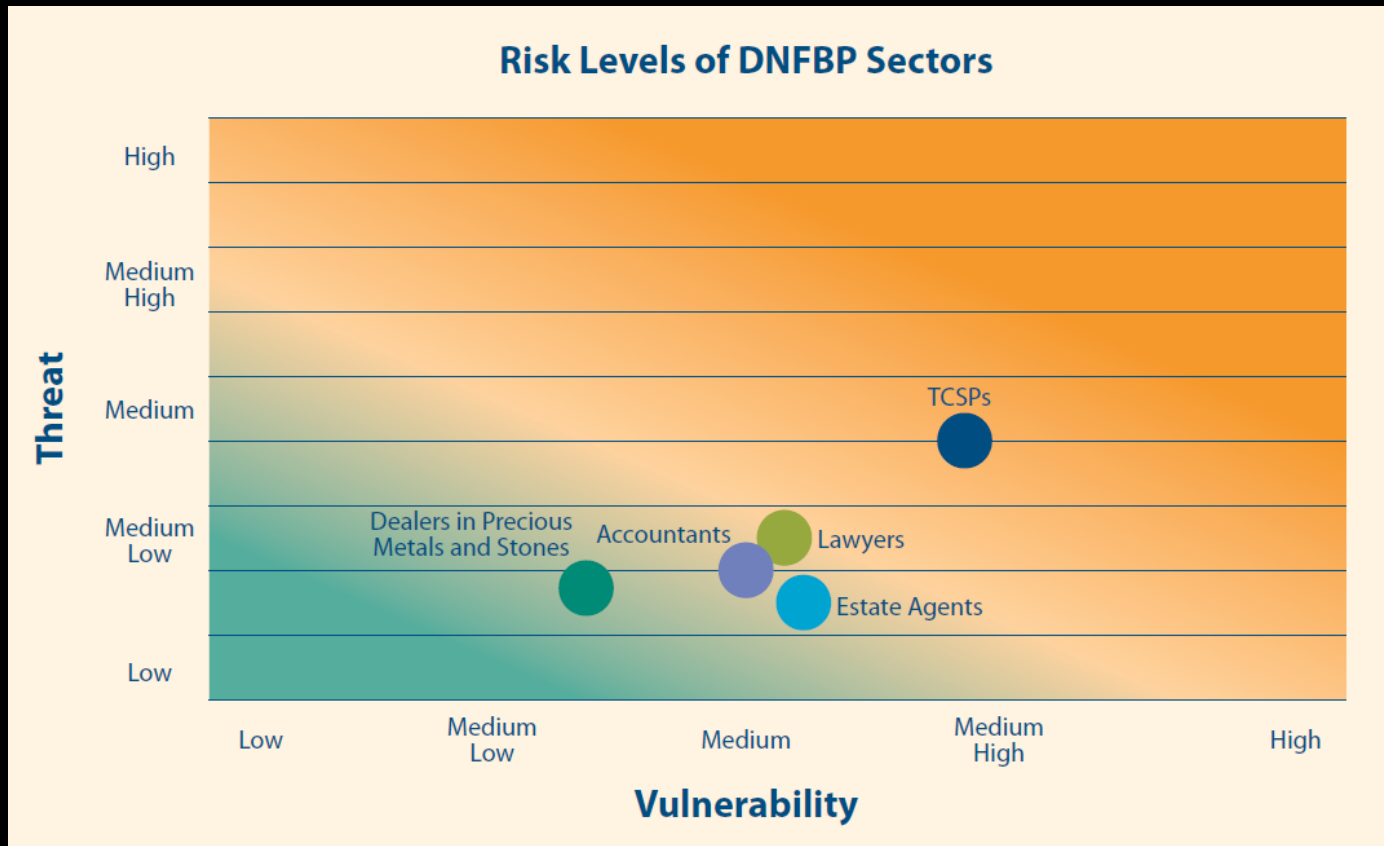


RISK ASSESSMENT

- Country/Geographic Risk
- Client Risk
- Transaction
- Service
- Channel Risk



RISK TO COMPANY SECRETARY



5 PILLARS OF AML COMPLIANCE

- Written Policies and Procedures
- A Designated AML Compliance Officer
- Independent Testing of the AML Program
- Adequate Training Program
- Risk-based CDD Procedures



AML/CTF GUIDELINE

- Risk assessment ✓
- Customer due diligence measures ✓
- Ongoing monitoring of customers ✓
- Suspicious transactions reporting ✓
- Record keeping ✓
- Staff training ✓

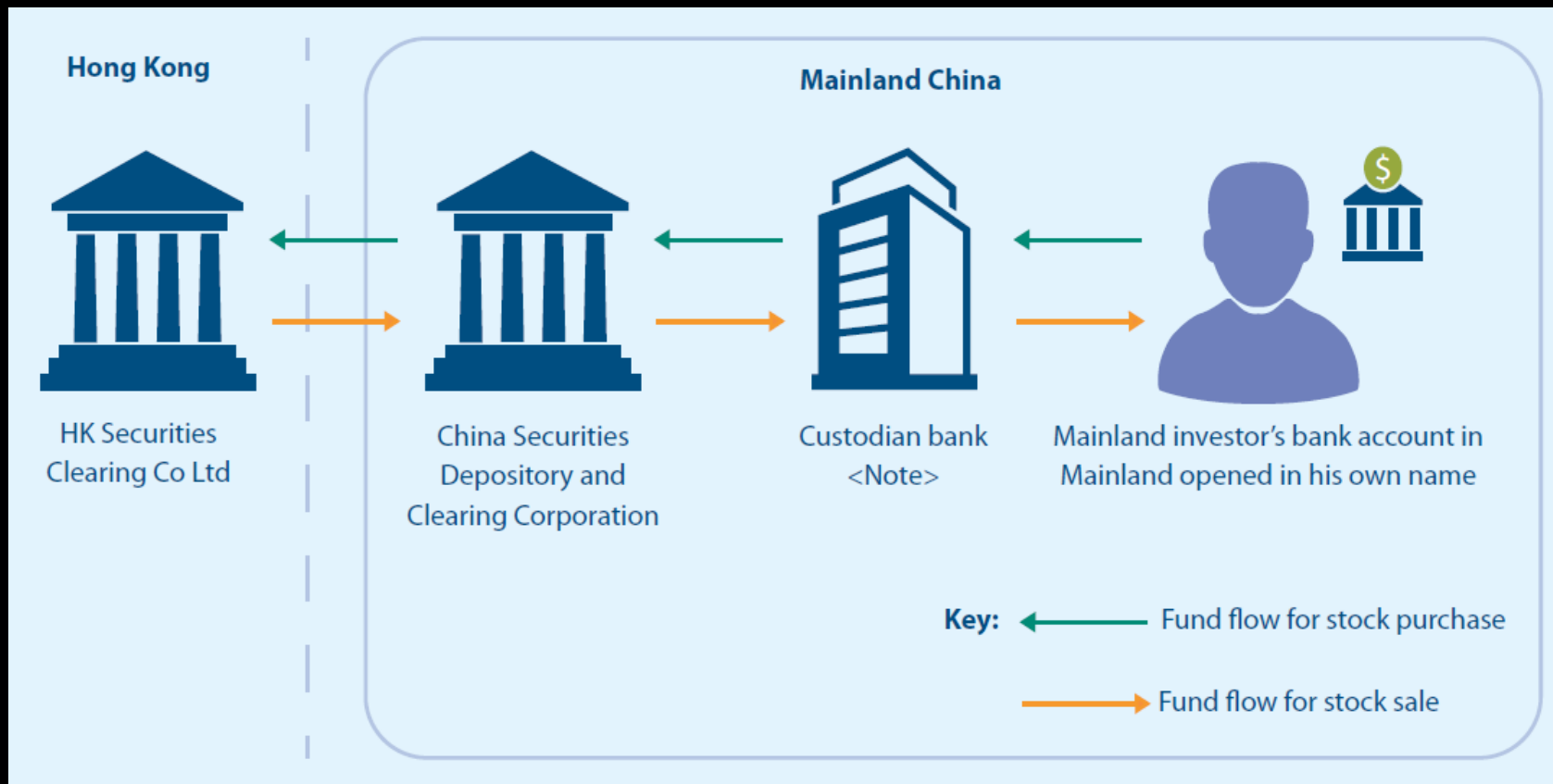


EXAMPLE OF ML/CFT RISK

- TCSP acting as company secretary in opening bank accounts
- Misuse of legal persons
- Move large sum between companies
- Fictitious invoice and shipping
- Hide beneficial owners with corporate structure
- Commingling legitimate business
- Use reputable companies as front



MONEY LAUNDERING RISK – CROSS BORDER FUND



HOW “AML SYSTEM FOR CSA” CAN HELP

- Real-time client information
- Risk assessment
- Sanction search
- Templates
- Record keeping
- Training



CONNECTION TO CSA DATA

AML/CTF system

File Help

Settings

AML database server	<input type="text" value="172.31.22.61"/>
AML database name	<input type="text" value="AML_Develop"/>
AML DB User ID	<input type="text" value="sa"/>
AML DB User password	<input type="password" value="*****"/> <input type="button" value="AML Connection Test"/>
CSA database server	<input type="text" value="192.168.42.72"/>
CSA database name	<input type="text" value="CSA_Expert_Oscar"/>
CSA User ID	<input type="text" value="master"/>
CSA User password	<input type="password"/> <input type="button" value="CSA Connection Test"/>



SCAN THE DATABASE TO ASSESS RISK

- Country and geographical risks
- Identity risk – check whether the copy of the ID is on file
- Risk level – front line staff's assessment
- Political affiliation – potential PEP
- Complex corporate structure
- Corporate beneficial owner
- TCSP acting as a company secretary and signer
- Change of ownership shortly after setting up bank account
- Use of registered office vs. nature of business
- Sanction risk



SCAN THE DATABASE TO ASSESS RISK CONTINUED

- Charitable organization or corporation by guarantee
- Corporate director
- Risky business
- Bearer share
- Personal assessment of risk level



SCAN THE DATABASE TO ASSESS RISKS

AML/CTF system

File Help

Search key Find Cancel

ID	Name	Last Recorded	Recorded	Progress
A000001	AA Company	2020-10-30	CDD(2), Sanction(3)	CDD(1), KYC(1), RISK(1)
A000002	AI-ARABI TRADING COMPANY	2020-10-29	KYC(1), Sanction(1)	CDD(1), KYC(1), RISK(1)
A001	Manatee Seafood Limited	2020-10-21	KYC(1)	CDD(1), EDD(1), KYC(1)
B000001	B & L Company			
C000001	China & Hong Kong Trading Investment Limited			CDD(1), EDD(1), KYC(1), RISK(1)
C001	Ransdale (China) Investment Company Limited	2020-10-29	CDD(2), KYC(2), RISK(1), Sanction(1)	CDD(1), EDD(1)
CHINA	China Software Development Company Limited			
CHINA_2	New China Company Limited			
D001	Penna Manufacturing Company Limited			
D03845	Worldwide Medical Company Limited			
HKG_GPN_1	Hong Kong Private Company Limited by Guarantee (No Sha			
HKG_ONE	Hong Kong One Person Company Limited			
HKG_PVT_1	Hong Kong (2009) Private Company Limited By Shares			
HILTCL	Hing Lung Trading Company Limited			
N000001	New Pending Company			
N000002	New BVI Co.			
O000001	Orange Company Limited			
P000002	Pending Company			
P002	Winsor Development Co. Ltd.			
PRC_BOC	Bank of China Limited			
PRCCO	PRC Co.			
S001	New Silver Form International Ltd.			



COMMONLY USED TEMPLATES

Template Maintenance (to edit draft checklist)

Template ID ? Title Title Del Print New

Section Select Cancel

Section	Template ID	Title	Type	Version
	CDD-T08	T08 Identification/ Verification of identity	CDD	Draft
	CDD-T09	T09 Identification/ Verification of identity	CDD	Draft
	CDD1	CDD1	CDD	Draft
	EDD CORPORA	Enhanced Customer Due Diligence - Corpc	CDD	Draft
	KY4	KY4	KYC	Draft
	KYC	Know Your Client	KYC	Draft
	KYC - T02	T02 Money Laundering Compliance Revi	KYC	Draft
	KYC - T04	T04 Customer Due Diligence (CDD)/ Know	KYC	Draft
	KYC - T05	T05 Customer Due Diligence (CDD)/ Know	KYC	Draft
	RISK - T06	T06 Risk assessment form - individual	RISK	Draft
	RISK ASSESSM	Risk Assessment	RISK	Draft
	RISK-T07	T07 Risk assessment form – entity	RISK	Draft
	SDD	Simplified Due Diligence	CDD	Draft

Done Copy Delete Insert Next Save Close



KNOW YOUR CLIENT



RISK ASSESSMENT



CUSTOMER DUE DILIGENCE



SANCTION SEARCH – ENTIRE DATABASE

The screenshot displays the 'Sanction check' window in the AML/CTF system. The window title is 'AML/CTF system' and it has a menu bar with 'File' and 'Help'. The main area is divided into several sections:

- Sanction check**: The main title of the window.
- by keys**: A tabbed interface with 'CSA search' selected.
- Search CSA data**: A section for inputting search criteria.
 - Input Date**: Radio buttons for 'Since the beginning' and 'Since' (selected). The 'Since' date is set to '11/02/2020'. Below are links for 'Today', 'This Week', and 'This Month'.
 - and**: A section for additional filters.
 - Client group**: A dropdown menu set to '** All Group **'.
 - and Client ID**: A dropdown menu set to '** All active Client **'.
 - Loading --**: A status indicator.
- Sanction List**: A section with checkboxes for 'OFAC - SDN' and 'UN.ORG - Consolidated', both of which are checked.
- Search** and **Close** buttons are at the bottom left.

The **Result** section contains a table with the following data:

	Source	Name (Last + First)	UID
1	UNC	KONY ALI	6908549
2	UNC	KONY JOSEPH	6908538
3	UNC	KONY SALIM	6908550

The **Record Result** section on the right shows the search criteria and results:

Search Result Sanction data

All active clients.
and "Input date since " 2020-11-02

Inspect 1 record.

=====

1 [SALIM KONY] SALIM KONY

Sanction result

=====

1 UNC 6908549 [SALIM KONY] KONY ALI
2 UNC 6908538 [SALIM KONY] KONY JOSEPH
3 UNC 6908550 [SALIM KONY] KONY SALIM

=====



STR REPORTING

- How to identify a Suspicion?
- When to submit an STR?
- How to submit an STR?
- What to Report in an STR?
- Download proforma for reporting STR



HOW TO IDENTIFY A SUSPICION

- Screen the account for suspicious indicators: Recognition of a suspicious activity indicators
- Ask the customer appropriate questions
- Find out the customer's records: Review of information already known when deciding if the apparently suspicious activity is to be expected.
- Evaluate all the above information: Is the transaction suspicious?



WHAT TO REPORT IN AN STR?

- Personal particulars (name, identity card or passport number, date of birth, address, telephone number, bank account number) of the person(s) or company involved in the suspicious transaction;
- Details of the suspicious financial activity;
- The reason why the transaction is suspicious - which suspicious activity indicators are present?
- The explanation, if any, given by the person about the transaction



RECORD KEEPING OF COMPLIANCE ACTIVITIES

AML/CTF system

File Help

Client: [C001] Ransdale (China) Investment Company Limited

Particulars | KYC | Risk | CDD | Sanction | STR | Record

Date	Type	Recorded by	Reference
2020-10-29 17:50	Sanction	MASTER	
▶ 2020-10-27 17:59	KYC		Comment
2020-10-25 16:35	RISK	MASTERTEST	RISK on 20201027
2020-10-24 23:31	CDD	MASTERTEST	(2) 20201027 CDD1
2020-10-24 23:30	CDD	MASTERTEST	20201027 CDD1
2020-10-22 11:25	KYC	MASTERTEST	KYC on 20201027

Reference: Comment



KEEPING TRACK OF TRAINING RECORDS

Policies and Procedures

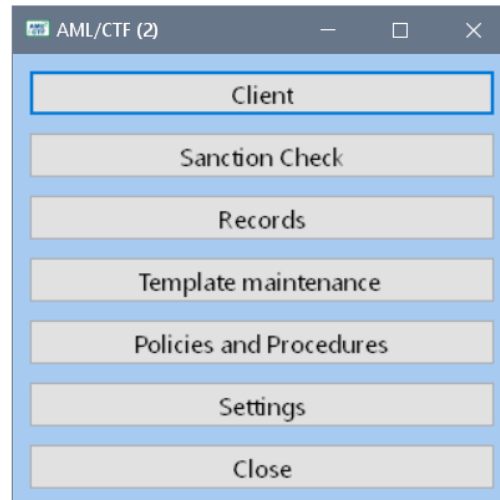
Practice Progress

User ID: MASTER Close

	User ID	Title	Start Date	Read Date	Status
1	MASTER	Chapter 1 - Introduction	04 Nov 2020 12:03	04 Nov 2020 12:04	Done
2	MASTER	Chapter 2 - What are money laundering and terrorist financing?	04 Nov 2020 12:12	04 Nov 2020 16:21	Done
3	MASTER	Chapter 3 - AML/CTF obligations of TCSP licensees	04 Nov 2020 12:15		Reading
4	MASTER	Chapter 4 - Assessing risk and applying a risk	04 Nov 2020 12:23		Reading
5	MASTER	Chapter 5 - Customer due diligence	04 Nov 2020 14:25		Reading
6	MASTER	Chapter 6 - Ongoing monitoring of business relationship with cus	04 Nov 2020 14:25	04 Nov 2020 14:28	Done
7	MASTER	Chapter 7 - Reporting suspicious transaction transactions	04 Nov 2020 14:29		Reading
8	MASTER	Chapter 8 - Financial sanctions and terrorist financing	04 Nov 2020 14:50		Reading
9	MASTER	Chapter 9 - Record -keeping	04 Nov 2020 14:50		Reading
10	MASTER	Chapter 10 - Staff training	04 Nov 2020 14:50		Reading
11	MASTER	Appendix A - Identification and verification of customer who is an	04 Nov 2020 14:43	04 Nov 2020 14:47	Done
12	MASTER	Appendix B - Identification and verification of customer which is a	04 Nov 2020 14:49		Reading
13	MASTER	Appendix C - Identification and verification of customer which is a	04 Nov 2020 14:50		Reading
14	MASTER	Appendix D - Identification and verification of customer which is a	04 Nov 2020 14:50		Reading



MAIN MENU



CLIENT MASTER FILE

AML/CTF system

File Help

Client [A001] Manatee Seafood Limited Search

Particulars KYC * Risk CDD * Sanction STR Record

	Data
Client ID	A001
Company Name	Manatee Seafood Limited 海象海鮮批發有限公司
Jurisdiction	Hong Kong
Registration No.	232323
Company Type	Limited by Shares (Private)
Incorporation Date	1992-05-20
Registered Office Address	Rm. 2402, City Top Tower, 24 King's Road, North Point, Hong Kong
Last A/R Date	1998-05-20
Source of Funds	Banker
Major Investor Country	Argentina
Share Class	Ordinary (Ordinary Type)
-----	-----
Currency	HKD
Issued Shares	2
Authorized Shares	10,000
Par Value / Liability of each member	1.00
Registered Capital	17.00 (Cash 2.00, Asset 12.00, Intangible 3.00)
Paid up Capital	9.00 (Cash 2.00, Asset 6.00, Intangible 1.00)



SELECT TEMPLATE

Select template

Template type

**** Select Template ID ****

**** Select Template ID ****

[RISK - T06] - T06 Risk assessment form - individual

[RISK ASSESSMENT] - Risk Assessment

[RISK-T07] - T07 Risk assessment form - entity



FILLING OUT TEMPLATE

AML/CTF system

File Help

Client: [A001] Manatee Seafood Limited Search

Particulars: KYC * Risk CDD * Sanction STR Record

Template ID: [KYC] Know Your Client New Print Save Delete

Section #	Description	Yes	No	N/A	Comment
1 A	Client entity to be onboard for our service or giving instructi				
2 A 1	Certificate of Incorporation / Certificate of Incumbency	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Checked
3 A 2	Memorandum / Articles of Association	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A2 was verified
4 A 3	Register of Member / Certificate of Incumbency / Annual Return (I	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5 A 4	Register of Director / Certificate of Incumbency / Annual Return (F	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6 A 5	Singapore ACRA Business profile	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7 A 6	Address Proof (a recent utility bill issued within the last 3 months)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wait for the document
8 A 7	Source of Fund	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9 A 8	Business Activity, purpose of structure, rationale of choosing jurisc	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10 A 9	Ownership Chart	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11 A 10	Latest Annual Return (Form NAR1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12 A 11	Audited Financial Statement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13 A 12	Authorized Signatory List	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14 A 13	Power of Attorney	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

A 1. Certificate of Incorporation / Certificate of Incumbency

Comment: Checked

Yes
 No
 N/A
Enter
Prev. Skip



INSTANT VIEW

AML/CTF system

File Help

Client: [C001] Ransdale (China) Investment Company Limited

Particulars | KYC | Risk | CDD * | Sanction | STR | Record

Bank	Data
Bank Account ID	Bank-Account-001
Account Type	Current Account
Currency	HKD
Banker	HSBC Bank plc - Main Office 總行
Account name	Ransdale (China) Investment Com
Account NO.	Bank-Account-001
Opened	1998-02-18
Reference Code	
Remark	
Signer	
A)	Chan Tai Man 陳大文 (From 20
1) : Less than 10,000	1A
2) : More than 10,000	1A, 1B

Particulars Bank Mem. Ben. Officers Jobs

Template ID: [CDD-T08] [New] [Print] [Save] [Delete]

Section	#	Description
1	A	Identification of Individual
2	A 1	Government issued photo-ID
3	A 2	Proof of home address
4	A 3	Sanctions check (personal)
5	B	OR
6	B 1	Government issued non-photo-ID (Should apply only if
7	B 2	Proof of home address
8	B 3	Second supporting document
9	B 4	Sanctions check (personal)
10	C	OR
11	C 1	Certified copy of proof of individual's identity
12	C 2	Certified copy of proof of home address
13	C 3	Sanctions check (personal)

A 1: Government issued photo-ID

Yes No N/A

Comment:

Enter

Prev. Skip



PRINT RECORD

Preview

Page 1/4

100%

[RISK ASSESSMENT] Risk Assessment Printed on 11/4/2020 10:59:49

[C001] Ransdale (China) Investment Company Limited :

Section	#	Item	Description	Yes	No	N/A	Comment
A Unacceptable Risk Factors (clients with "Yes" to the questions below shall not be accepted)							
A	1		Is the client, beneficial owner, director, authorized signatory, other relevant parties any of the below: - criminal; - associated with criminal groups; - terrorist; - associated with terrorist groups or activities; - sanctioned or subject to prohibition or designated as high money laundering risk by the UNSC or OFAC?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A	2		Is the client incorporated/ operating in sanctioned countries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A	3		Is the client associated with sanctioned countries? This applies to: - Country of nationality/ place of residence/ place of birth of the company-related individuals; or - Clients (including beneficial owners) wealth and funds derived from sanctioned countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A	4		Is the client a shell company or an offshore company with bearer shares?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A	5		Is the client engaged in any one of the following business/ industries: - Arms or military related business - Sex-related industries - Human trafficking - Unregulated/ online gambling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B Auto-High Risk Factors (client with "Yes" to the questions below shall be classified as High Risk)							

1 of 4



PRINT PARTICULAR

Preview

100% Page 1/6

Printed on 11/4/2020 11:01:38

Company Particulars

[C001] Ransdale (China) Investment Company Limited

Item	Data
Client ID	C001
Company Name	Ransdale (China) Investment Company Limited 龍華(中國)投資有限公司
Jurisdiction	Hong Kong
Registration No.	743634
Company Type	Limited by Shares (Private)
Incorporation Date	1995-05-14
Registered Office Address	4/F., South Sea Center, 75 Mody Road, T.S.T, Kowloon
Last A/R Date	1998-05-14
Share Class	Ordinary (Ordinary Type)
Currency	HKD
Issued Shares	400,004
Authorized Shares	5,030,000
Par Value / Liability of each member	1.00
Registered Capital	400,003.00 (Cash 400,003.00)
Paid up Capital	400,003.00 (Cash 400,003.00)
Share Class	Ordinary B (Ordinary Type, Authorized Shares, Voting Rights)
Currency	USD
Issued Shares	1
Authorized Shares	10,000
Registered Capital	1.00 (Cash 1.00)
Paid up Capital	1.00 (Cash 1.00)

1 of 6



SANCTION CHECK: RESULTS

The screenshot displays the 'Sanction check' interface in the AML/CTF system. The window title is 'AML/CTF system'. The interface is divided into several sections:

- Sanction check:** Contains search filters and controls.
 - by keys:** Includes 'CSA search' and 'Search CSA data'.
 - Input Date:** Radio buttons for 'Since the beginning' and 'Since 11/02/2020'. Below are links for 'Today', 'This Week', and 'This Month'.
 - and Client group:** A dropdown menu set to '** All Group **'.
 - and ClientID:** A dropdown menu set to '** All active Client **'.
 - Sanction List:** Checkboxes for 'OFAC - SDN' and 'UN.ORG - Consolidated', both of which are checked.
 - Buttons:** 'Search' and 'Close' buttons.
- Result:** A table with columns 'Source', 'Name (Last + First)', and 'UID'.

	Source	Name (Last + First)	UID
1	UNC	KONY ALI	6908549
2	UNC	KONY JOSEPH	6908538
3	UNC	KONY SALIM	6908550
- Record Result:** A button located above the 'Sanction data' panel.
- Search Result / Sanction data:** A detailed view of the selected record (KONY ALI).
 - Process on:** 2020-11-04 16:22:55
 - Source:** UNITED NATIONS SECURITY COUNCIL
 - Source updated date:** 14 Oct 2020
 - Source record count:** 1018
 - Particulars:**
 - DataID:** 6908549
 - Last Name:** ALI
 - First Name:** KONY
 - List Type:** CAR
 - Reference Number:** CFI.010
 - Listed on:** 2016-08-23
 - Comments:** Ali Kony is a deputy in the Lord's Resistance Army (LRA) (CFE.002), a designated entity and the son of LRA leader Joseph Kony (CFI.009), a designated individual. Ali was incorporated into the LRA's leadership hierarchy in 2010. He is part of a group of senior LRA officers who are based with Joseph Kony. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/How-we-work/Notices/View-UN-Notices-Individuals>
 - List Type:** VALUE
 - UN List:** UN List
 - Address:** (field is present but empty)



POLICIES AND MANUAL

Policies and Procedures

Practice Progress

Reading Duration 04 Nov 2020 12:12 ~ 04 Nov 2020 16:11 User ID MASTER Read Close

Guideline on Compliance of AML/CTF

- Chapter 1 - Introduction
- Chapter 2 - What are money laundering and terrorist financing?
- Chapter 3 - AML/CTF obligations of TC
- Chapter 4 - Assessing risk and applying
- Chapter 5 - Customer due diligence
- Chapter 6 - Ongoing monitoring of bu
- Chapter 7 - Reporting suspicious trans
- Chapter 8 - Financial sanctions and ter
- Chapter 9 - Record -keeping
- Chapter 10 - Staff training
- Appendix A - Identification and verifca
- Appendix B - Identification and verifca
- Appendix C - Identification and verifca
- Appendix D - Identification and verifca
- Glossary of key terms and abbreviator

Chapter 2 - What are money laundering and terrorist financing?

2.1 The term "money laundering" is defined in section 1 of Part 1 of Schedule 1 to the AMLO as an act intended to have the effect of making any property:

- (a) that is the proceeds obtained from the commission of an indictable offence under the laws of Hong Kong, or of any conduct which if it had occurred in Hong Kong would constitute an indictable offence under the laws of Hong Kong, or
- (b) that in whole or in part, directly or indirectly, represents such proceeds, not to appear to be or so represent such proceeds.

Three common stages in money laundering

- (a) Placement - physical disposal of cash proceeds derived from illegal activities;
- (b) Layering - separating illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the source of the money, subvert the audit trail and provide anonymity; and
- (c) Integration - creating the impression of apparent legitimacy to criminally derived wealth. In situations where the layering process succeeds, integration schemes effectively return the laundered proceeds back into the general financial system and the proceeds appear to be the result of, or



TRAINING

Policies and Procedures

Practice Progress

User ID: MASTER Close

	User ID	Title	Start Date	Read Date	Status
1	MASTER	Chapter 1 - Introduction	04 Nov 2020 12:03	04 Nov 2020 12:04	Done
2	MASTER	Chapter 2 - What are money laundering and terrorist financing?	04 Nov 2020 12:12	04 Nov 2020 16:21	Done
3	MASTER	Chapter 3 - AML/CTF obligations of TCSP licensees	04 Nov 2020 12:15		Reading
4	MASTER	Chapter 4 - Assessing risk and applying a risk	04 Nov 2020 12:23		Reading
5	MASTER	Chapter 5 - Customer due diligence	04 Nov 2020 14:25		Reading
6	MASTER	Chapter 6 - Ongoing monitoring of business relationship with cus	04 Nov 2020 14:25	04 Nov 2020 14:28	Done
7	MASTER	Chapter 7 - Reporting suspicious transaction transactions	04 Nov 2020 14:29		Reading
8	MASTER	Chapter 8 - Financial sanctions and terrorist financing	04 Nov 2020 14:50		Reading
9	MASTER	Chapter 9 - Record -keeping	04 Nov 2020 14:50		Reading
10	MASTER	Chapter 10 - Staff training	04 Nov 2020 14:50		Reading
11	MASTER	Appendix A - Identification and verification of customer who is an	04 Nov 2020 14:43	04 Nov 2020 14:47	Done
12	MASTER	Appendix B - Identification and verification of customer which is a	04 Nov 2020 14:49		Reading
13	MASTER	Appendix C - Identification and verification of customer which is a	04 Nov 2020 14:50		Reading
14	MASTER	Appendix D - Identification and verification of customer which is a	04 Nov 2020 14:50		Reading



SANCTION SEARCH ON WEB

P & L ASSOCIATES
P & L Software Publishing Limited

Home About CSA **AML Sanction Search** CPAnywhere Contact

AML Sanction Search

AML/CTF

Individual Entity

Hint: You need only to enter last name, or part of the corporate name to search

Last Name

First Name

Alias

ID Number

Res. Country/Address

[Hong Kong](#) [China](#) [Taiwan](#)

Sanctioned Lists

US Treasury Consolidated as of 2020-10-29

UN Consolidated as of 2020-10-30



MOBILE APP FOR SANCTION SEARCH

The screenshot shows the Google Play Store interface for the 'AML Search' app. The app is categorized as 'Productivity' and is available for free. The main app card features a pink square logo with 'AML Search' in white text. Below the logo, it says 'P & L Software Publishing Limited' and 'Productivity'. A green 'Install' button is prominent on the right. A note indicates 'This app is compatible with your device.' Below the main card, two preview images show the app's search interface. The left preview is for 'AML/CTF' and the right is for 'AML/CTF'. Both show a search form with fields for 'Last Name', 'First Name', 'Alias', 'ID Number', and 'Res. Address'. Below the form, there are checkboxes for 'Sanctioned Lists' including 'US Treasury Consolidated as of 2020-10-14' and 'UN Consolidated as of 2020-10-14'. A 'Search' button is at the bottom of each preview. A disclaimer is visible at the bottom of each preview. To the right of the main app card, there is a section 'More by P & L Software Publishing Limited' with a 'See more' button. Below this, three other apps are listed: 'HKMS', 'HKMonkey', and 'PLSOFT', each with its respective logo and publisher name.

Google Play Search

Categories Home Top charts New releases

My apps Shop Games Family Editors' Choice Account Payment methods Play Points New My subscriptions Redeem Buy gift card My wishlist My Play activity Parent Guide

AML Search
P & L Software Publishing Limited Productivity

This app is compatible with your device.

Add to Wishlist **Install**

AML/CTF
Individual or Entity
How You need only to enter last names, or part of the corporate name to search.
Last Name First Name
Alias
ID Number ID Number
Res. Address Res. Address
Sanctioned Lists
 US Treasury Consolidated as of 2020-10-14
 UN Consolidated as of 2020-10-14
Search
Disclaimer

AML/CTF
Individual or Entity
How You need only to enter last names, or part of the corporate name to search.
Last Name First Name
Alias
ID Number ID Number
Res. Address Res. Address
Sanctioned Lists
 US Treasury Consolidated as of 2020-10-14
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- Send Suggestions to Harry Tsui at HARRY@PLSOFT.COM
- First Review of the Final User Group Report



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