

Newsletter

October 2024 年 10 月

- CSA
- CPAnywhere
- AML for CSA

P & L Associates

通訊·聯繫

Inside this Issue 本期內容：

[CSA](#)

- Q & A for Users: CR's e-Services Related
用戶答問系列之：關於公司註冊處的電子服務
- (A) What services does the e-Services Portal provide?
電子服務網站提供些什麼服務？
- (B) Can I use the e-Services without a user account?
我不是登記用戶，可否使用電子服務？
- (C) Who can register as a user of the e-Services Portal?
誰可登記成為電子服務網站的用戶？
- (D) What is User Account Association?
什麼是用戶聯繫

[CPAnywhere](#)

- The "Job Assignment Control Sheet" Revisited
「工作委派管理表」再探

[AML for CSA](#)

- Improving the Search Speed on the "PEP Private Database"
提升「政治人物內置資料庫」的搜尋速度
- Severe Penalty for not Identifying PEP or not Doing EDD in a Timely Manner
未識別政治人物或未及時進行嚴格盡職審查的嚴厲處罰

[General Interest 產品以外](#)

- What are the disadvantages of holding a US green card while residing in Hong Kong?

[Join Our Team 人才招聘](#)

- CSA Support Specialist (CSA 支援專員)
- System Support Specialist (系統支援專員)



CSA: the Company Secretarial Software
公司秘書專業軟件

Q & A for Users: CR's e-Services Related

用戶答問系列之：有關公司註冊處的電子服務

e-Services (Electronic Services) are services to be delivered electronically by the Companies Registry ("CR") to its customers. You can use these services through their e-Services Portal (Electronic Services Portal) by registering as a "registered user" with the CR. The underlying software system behind the e-Services Portal is called the Integrated Companies Registry Information System ("ICRIS") with its current version being launched on 27 December 2023.

「電子服務」(e-Services) 是公司註冊處 (CR) 以電子方式提供給客戶的服務。您可以經 CR 登記成為「登記用戶」，並透過其「電子服務網站」(e-Services Portal) 使用這些服務。該電子服務網站背後的基礎軟件系統稱為「公司註冊處綜合資訊系統」(ICRIS)；目前版本是於 2023 年 12 月 27 日推出的。

ICRIS supports almost all operating systems in different devices including desktop computers, tablets, and smartphones.

ICRIS 支援幾乎所有不同作業系統的設備，包括桌上型電腦、平板電腦和智能手機。

(A) What services does the e-Services Portal provide?

電子服務網站提供些什麼服務？

- (1) e-Filing Services for delivery of forms and documents in electronic form to CR;
電子提交服務 — 以電子方式向 CR 交付表格和文件；
- (2) e-Search Services for online access to the public records kept by CR; and
電子查冊服務 — 以網上查閱方式取覽由 CR 備存的公眾紀錄；及
- (3) Access to Withheld Information / Protected Information Services for obtaining withheld information or protected information (e.g. the full HKID card no. and usual residential address of directors) kept by CR.
取覽不提供的資料 / 受保護資料服務 — 取覽由 CR 備存的不提供的資料或受保護資料 (例如董事的完整香港身分證號碼及通常住址)。
- (4) Other services such as the Annual Return e-Reminder Service (to remind you to file an annual return before its due date) and e-Monitor Service (to notify you when a document is registered by CR in the public records of a company).
其他服務 — 例如「周年申報表 e 提示」(提醒您在到期日之前提交週年申報表) 及「監察易」服務 (當有文件獲 CR 登記在公司的公眾紀錄時通知您)。

(B) Can I use the e-Services without a user account?

我不是登記用戶，可否使用電子服務？

In general, you must be a “registered user” in order to use the e-Services.

一般來說，您必須是「註冊用戶」才能使用電子服務。

However, there is one exception: You may access the e-Search Services as an “Unregistered Online User” in an ad hoc manner (something like a “guest login” in some other portals). Since you do not have a “payment account”, you have to make each payment for each e-Search Service.

然而有一個例外：您可以以「無帳戶使用者」的身分臨時使用電子查冊服務 (類似於其他一些入口網站中的「訪客登入」)。由於您沒有「付款帳戶」，因此您每次查冊時都要逐次繳付服務費用。

(C) Who can register as a user of the e-Services Portal?

誰可登記成為電子服務網站的用戶？

There are four types of “user accounts” for different entities to apply for:

「用戶帳戶」有四種類型供不同的實體申請：

User Account 用戶帳戶	For 適用於	e-Services Available 可提供的電子服務
Individual 個人	Natural persons 自然人	All services 所有服務
CR Company CR 公司	Local companies or registered non-Hong Kong companies registered with CR under the Companies Ordinance (cap.622) 根據《公司條例》(第 622 章) 在 CR 註冊的本地公司及註冊非香港公司	All services 所有服務

BR Entity BR 實體	Businesses registered only with IRD under the Business Registration Ordinance (cap.310) 只根據《商業登記條例》(第 310 章) 在稅務局註冊的業務	All services 所有服務
Other Non-Individual 其他非個人	Applicants who are not within the above three types of users 不屬於以上三種用戶類別的申請人	e-Search 電子查冊 Access to withheld/protected information 取覽不提供/受保護資料

(D) What is User Account Association?

什麼是用戶聯繫？

“User Account Association” is a necessary measure of the CR’s system to identify the relationship between a user and a company. Without such measures, e-Filing Services will become impossible.

「用戶關聯」是 CR 系統一種識別用戶與公司之間關係的必要措施；否則電子提交服務就不可能實現。

Assuming that the company secretary of Client Limited is Secretary Limited, a TCSP, in which you are the director of that TCSP. Here comes two sets of relationships, namely (1) Client Limited and Secretary Limited, and (2) Secretary Limited and you.

假設 Client Limited 的公司秘書是 Secretary Limited (一家 TCSP)，而您是該 TCSP 的董事。這裡有兩組關係，分別是 (1) Client Limited 與 Secretary Limited 以及 (2) Secretary Limited 與您。

As any signatures must be done by a natural person, the system only allows Individual Users to sign and submit documents electronically. You must therefore first make the necessary account association to enable the system to identify the relationships between you and all related companies before you can use the e-Filing Services.

由於任何簽名都必須由自然人完成，系統僅允許個人用戶以電子方式簽署和提交文件。因此，您須先進行必要的用戶關聯，使系統能夠識別您和各有關公司之間的關係，然後才能使用電子提交服務。

What if you have hundreds or thousands of clients? Fortunately, the CR’s system is smart enough to sort out the relevant companies and will build the association for you automatically provided that you have already registered as an Individual User and subscribed to the e-Filing Services. The system will do the automatic association when you log on to the e-Filing Services of the e-Services Portal.

如果您有數百或數千個客戶怎麼辦？幸運的是，CR 的系統足夠聰明，可以將有關公司找出並自動為您建立關聯。前提是您已登記成為個人用戶並已訂用電子提交服務。當您登入電子服務網站的電子提交服務時，系統將自動進行關聯。

Please note that automatic association can only be built for company officers with HKID card no. or passport no. recorded in the CR database. Company officers refer to directors, company secretaries, and non-Hong Kong companies’ authorized representatives.

請注意，自動關聯僅適用於有香港身分證號碼或護照號碼記錄在 CR 資料庫中的公司高級人員。公司高級人員指董事、公司秘書及非香港公司的授權代表。

The “Job Assignment Control Sheet” Revisited

「工作委派管理表」再探

Out of all the management reports in CPAnywhere, my favorite one is still the Job Assignment Control Sheet. Thanks to Eric Mayer of Mayer & Associates, he has introduced us his unique way of summarizing complex information into an easily understandable form. This report is perfect for keeping track of time charged, disbursement, and miscellaneous charges and whether those amounts are being billed timely.

在 CPAnywhere 所有的管理報告中，我最喜歡的仍然是工作分配管理表。感謝 Mayer & Associates 的 Eric Mayer，他為我們引介了如何將複雜資訊總結為易於理解的形式之獨特方法。該報告非常適合追蹤收費時間、支出和雜項費用，以及這些款額是否及時計費。

The summary section plays a vital role in giving partners or managers a clear understanding of what is going on in this assignment.

對於讓合夥人或經理清楚地了解該委派工作中發生的情況，摘要部分起著至關重要的作用。

The Summary section includes the “Balance” and “Record Count”:

摘要部分包括「餘額」和「記錄數目」：

- (1) Fixed Fee 固定費用
- (2) Advances and Deposits 預付款項和存款
- (3) Disbursements Balance 支出餘額
- (4) Miscellaneous Charges 雜項費用
- (5) Invoiced (Fixed Fee) 已開立發票 (固定費用)
- (6) Trust Monies 信託款項
- (7) Billable Items 可計費項目

Total Fee:

總費用：

- (1) Pending Fee 待定費用
- (2) Billed Fee (Time Charge) 已計費 (計時收費)
- (3) Unbillable Fee (Time Spent) 無法計費 (所花費的時間)

The detailed transaction sections include the following:

詳細交易部分包括以下內容：

- (1) Disbursements 墊支
- (2) Miscellaneous Charges 雜項費用
- (3) Invoiced (Fixed Fee) 已開立發票 (固定費用)
- (4) Time Charged and Spent 收費及所花費的時間

All this information is extremely important to partners and managers to quickly evaluate the status of a job assignment for follow-up.

所有這些資訊對於合夥人和經理快速評估某委派工作的狀態以進行後續跟進都極為重要。

Printed By : MASTER 03/09/2024 (11:55:32)

Demo Software Company
Job Assignment Control Sheet

1200001-AUD-SA-20231231 - ABC Company Limited - Statutor
1200001 - ABC Company Limited
As Of Date 03 Sep 2024

Filter Criteria : Order By Employee ID.

Summary

Description	Amount	Record Count
Fixed Fee	0	---
Advances And Deposit	0	0
Disbursement Balance	1550	3
Misc. Charges	700	2
Invoiced (Fixed Fee)	22000	5
Trust Monies	0	0
Billable	0	0
Total Fee	24250	

Pending	0	0
Billed (Time Charge)	0	0
Unbillable (Time Spent)	22000	7

Disbursement

Date	Trans ID	Description	Disbursement	Status	D/R Bal
20/10/2023	DR-00045	Claim for 16/10/2023	1000		
20/10/2023	DR-00046	Litigation Search	50		
20/10/2023	DR-00047	Long distance calls	500		
Total			1550		

Misc. Charges

Date	Trans ID	Description	Amount	Status	A/D Bal
20/10/2023	MS-00026	Claim for 16/10/2023	600		
20/10/2023	MS-00027	Local courier charges	100		
Total			700		

Invoiced (Fixed Fee)

Date	Description	Amount	Status	Balance
5/10/2023	Description 1000	1000	Billed	990
6/10/2023	Description 2000	2000	Billed	2000
9/10/2023	Description 3000	3000	Billed	3000
10/10/2023	Description 4000	4000	Billed	4000
25/10/2023		12000	Billed	12000
Total		22000		

Time Charged And Spent [7]

Employee	Date	Time Code	Time Spent	Time Charged	Hourly Rate	Charged Amount
MASTER System Administrator	7/11/2023	AUD-SA-01	08:00	08:00	500	
	8/11/2023	AUD-SA-01	08:00	08:00	500	
	9/11/2023	AUD-SA-01	08:00	08:00	500	
	21/11/2023	AUD-SA-00	08:00	08:00	500	
	24/11/2023	AUD-SA-00	04:00	04:00	500	
	27/11/2023	AUD-SA-00	04:00	04:00	500	
	28/11/2023	AUD-SA-00	04:00	04:00	500	
[MASTER] SubTotal :			44:00	44:00		2
Total :			44:00	44:00		2



AML for CSA

(為遵從打擊洗錢及恐怖分子資金籌集的規定)

Improving the Search Speed on the “PEP Private Database”

提升「政治人物內置資料庫」的搜尋速度

PEP Private Scan is a unique feature in AML for CSA. It helps our users to determine if an individual is a PEP (Politically Exposed Person) which is part of the client's risk assessment operation for TCSPs and other professionals. You can do an ad hoc search by inputting the name of a person or you can scan the whole Entity list in CSA.

「PEP 內置搜尋」是 AML for CSA 中獨特的功能。它幫助用戶確定某人是否政治人物 (PEP)，這是 TCSP 和其他專業人士的客戶風險評估操作的一部分。您可以輸入某人的姓名進行個別搜索，也可以掃描 CSA 中的整個實體清單。

Recently, we received a phone call from one of our AML for CSA users complaining about the search time in PEP Private Scan. He spent almost 4 hours on the entire process of scanning their whole CSA Entity list (containing some 10,000 records) against our PEP Private Database!

最近，我們接到一位 AML for CSA 用戶打來的電話，抱怨 PEP 內置搜尋的時間太長。整個過程，他花了近 4 個小時，根據我們的「PEP 內置資料庫」掃描整份包含一萬多條記錄的 CSA 實體清單！

After investigations, we found out that the sudden increase in the search time is because of our massive addition to the PEP Private database from around 2,000 records to over 20,000s, a ten-fold increase! We have recently updated the local PEP list and added many PEPs from various important countries like China, the USA, the UK, and others. Our intention is to enhance the richness of the PEP Private Database and to benefit our users by setting it as an ongoing process. That means the database will become larger and larger and the search time will be slower and slower...

經過調查，我們發現搜尋時間突然變長是因為我們大量增益了「PEP 內置資料庫」，從大約 2,000 條記錄增加到 20,000 多條，足足增加了十倍！我們最近更新了本地政治人物的名單，並增加了許多來自中國、美國、英國等重要國家的政治人物。我們的目的是要增強「PEP 內置資料庫」的豐富性，並透過將其設定為持續的操作，令用戶受益。這意味著資料庫會變得越來越大，搜尋時間也會越來越慢.....

In response to this problem, we have revamped the feature by restructuring the database and rephrasing the search algorithm. By doing so, testing shows that we have successfully cut down the search time from 4 hours to approximately 30 minutes! You will find the new search method in our upcoming release soon.

針對這個問題，我們透過重構資料庫、重塑搜尋演算法等方式對此功能進行了改造。測試結果顯示我們成功地將搜尋時間從 4 小時縮短到大約 30 分鐘！您可以在我們即將發布的版本中使用新的搜尋方法。

Severe Penalty for not Identifying PEP or not Doing EDD in a Timely Manner

未識別政治人物或未及時進行嚴格盡職審查的嚴厲處罰

The Hong Kong branch of AIA International Ltd (“AIA Hong Kong”) is to pay a HK\$23 million penalty after the Insurance Authority found the company’s screening processes had not always identified politically exposed persons (PEPs). Furthermore, certain customers assessed by the AML/CTF system as being “high risk” had also not been subjected to Enhanced Due Diligence (EDD) in a timely manner.

保險業監管局發現友邦保險國際有限公司的香港分公司（「友邦香港」）未能識別出所有政治人物（PEP），該公司將被處以 2,300 萬港元的罰款。另外，部分被 AML/CTF 系統評估為「高風險」的客戶未有及時接受嚴格盡職審查。

During an on-site inspection carried out by the Insurance Authority under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (cap.615) (“AMLO”) on the business carried on by AIA Hong Kong, the inspectors found a defect and other technical issues in its AML/CTF system. This defect is in existence during the period from March 2016 to October 2022.

保險業監管局依據《打擊洗錢及恐怖分子資金籌集條例》(第 615 章) (“AMLO”) 對友邦香港所經營的業務進行實地查察行動時，發現其 AML/CTF 系統存在缺陷和技術問題。此缺陷在 2016 年 3 月至 2022 年 10 月期間存在。

According to the Insurance Authority, “not all customers (or the beneficial owners of its customers) who were politically exposed persons (PEPs) had been picked up in the screening ‘alert’ processes. Whilst ultimately there were no policyholders onboarded who should not have been, the system issues identified resulted in delays in the Company’s Hong Kong branch establishing their source of funds/wealth and obtaining the requisite senior management approval as required by AMLO. Certain customers assessed by the AML system as being “high risk” had also not been subjected to enhanced due diligence in a timely manner and it was identified that improvements were needed in the monitoring processes for suspicious transactions in the Company’s Hong Kong branch.”

根據保險業監管局：「在篩查「警報」流程中，並非所有被視為「政治人物」的客戶（或客戶的實益擁有人）都被識別。儘管最終沒有不應成為保單持有人的人士成功投保，但系統存在的問題導致該公司香港分行在按照 AMLO 要求確立客戶的資金 / 財富來源，以及獲取所需的高級管理層的批准上出現延誤。部分被打擊洗錢系統評估為「高風險」的客戶未有及時接受嚴格盡職審查，而該公司香港分行的可疑交易監察流程亦需要改進。」

As a remedy, AIA Hong Kong promised to enhance its AML/CTF system and to hire independent consultants to improve the effectiveness of the compliance measures and the continuity of the workflow measures.

作為補救措施，友邦香港承諾加強其 AML/CTF 的系統，並聘請獨立顧問以提高合規措施的有效性和工作流程措施的連續性。

Lesson to be learned in this case:

從這個案例中我們應該學到的教訓：

- Checking for PEP is as important as checking for sanction.
查核 PEP 與查核制裁名單同樣重要。

- The inspection period for AML/CTF compliance may last for 7 years.
AML/CTF 合規性查察期可持續 7 年。

You may visit the following URL of the Insurance Authority for details:

詳情可瀏覽以下保險業監管局網址：

[Insurance Authority - Insurance Authority inspection results in enhancements to anti-money laundering controls and processes and fine \(ia.org.hk\)](https://www.ia.org.hk/en/inspections/inspection-results/inspection-results-in-enhancements-to-anti-money-laundering-controls-and-processes-and-fine)



General Interest

產品以外

What are the disadvantages of holding a US green card while residing in Hong Kong?

Many people who have immigrated to the US but later changed their minds and decided to return to Hong Kong. They want to keep the US residency status as an insurance for the unknown but are unaware of all the liabilities that come with the green card, even if their green cards are already expired.

This is the worst scenario where the green card holder incurred all the tax and reporting liabilities but without the benefit of returning to the USA.

In general, the validity of a green card depends on whether the holder has the intention of staying in the US. The general rule is that if the green card holder left the US for more than one year without applying for a Return Permit, the government considers that person has already exhibited his intention and the US Immigration will confiscate his green card at the port of entry, pending legal proceedings. However, that person is still liable for all kinds of tax and reporting liabilities. Those liabilities are:

- (1) Filing the US tax return every year.
- (2) Filing the Foreign Bank Report annually.
- (3) Report and pay taxes on all bank interest, dividends, and capital gains on stock and real properties. All these incomes are generally exempted in Hong Kong.
- (4) Filing the Estate Tax Return if deceased and his heirs may be liable for US taxes.

If Kamala Harris gets elected, she promises to introduce a Wealth Tax on rich US persons. That includes all green card holders.

As you can see, the person can avoid all these liabilities by properly giving up his green card by filing Form I-407 to the USCIS Eastern Forms Center and filing Form 8854 as the Expatriation Tax Return. We will discuss how to do it properly without causing any chance of an audit at a later date.

(This article does not have a Chinese version. 本文並無中文版。)

Join Our Team 人才招募

We are looking to hire someone who possesses a passion for an IT-related job.

If you think you are one of them, please send your resume to career@plsoft.com telling us about yourself.

對下列 IT 相關的工作感興趣？ 將履歷發送至 career@plsoft.com 給我們介紹一下您自己吧！

Strictly Confidential 絕對保密

CSA Support Specialist (CSA 支援專員)

If you are problem-solving orientated and have hands-on experience in using CSA (the company secretarial software), you are the most suitable person!

Your major duties include:

- Perform User Support (resolve technical issues for users via phone or electronically)
- Provide User Training (conduct on-line learning sessions for new users)

Intensive in-house training will be provided for you to perform the above duties.

System Support Specialist (系統支援專員)

- Be customer-service orientated
- At least two years of IT-related work experience
- Hands-on experience in trouble-shooting PC, LAN, and Internet problems
- Knowledge of installing MS-SQL, MS Windows, and Linus servers
- Perform in-house hardware/software installation, configuration, and maintenance
- Provide IT supporting and trouble-shooting services for clients as needed

This Newsletter is published by P & L Associates | www.plsoft.com

Copyright (c) P & L Associates. All rights reserved.

Information herein is for reference only and should not be construed as professional advice or legal opinion provided by the publisher to its readers. Content subject to change without notice.

CPAnywhere is a registered trademark of P & L Software Publishing Limited.

Any questions, comments, or suggestions can be sent to the Editor at plinfo@plsoft.com

Tel: 2521-3110 | GPO Box 600, Hong Kong