

貴金屬及寶石業務的描述及打擊洗錢及恐怖分子資金籌集的措施 (續期)

**Descriptions of Precious Metals and Stones Business &
Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) Measures (Renewal)**

申請人姓名/名稱 Name of Applicant	
貴金屬及寶石交易商B類註冊號碼 DPMS Category B Registration No.	

**甲部
Part A**

**貴金屬及寶石業務的描述
Descriptions of Precious Metals and Stones Business**

A.1	<p>公司背景及架構 (例如公司歷史、組織架構、僱員人數、業務性質以及提供的產品及服務等。如自上次申請獲批或提交周年報表後，相關情況有所變動，尤其是「指明現金交易」的業務狀況變更，請註明。)</p> <p>Company background and structure (e.g. company history, organizational structure, number of employees, business nature, types of goods and services provided, etc. If there have been any changes since the approval of your last application or submission of annual return, particularly regarding the business pattern of “Specified Cash Transactions”, please specify.)</p>
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如空位不敷填寫，請詳列於丙部的補充附頁。

Please use the Supplementary Sheet at Part C if the space provided is not adequate.

請在適當方格內加上“✓”號 Please insert a “✓” in the appropriate box

* 請刪去不適用者

Please delete as appropriate

A.2 所隸屬的香港或非香港集團的資料 (例如所隸屬集團的簡介、申請人與該集團的業務關係、該集團是否正受到其他形式的監管，如持有由其他監管機構/主管當局批給的牌照等。如自上次申請獲批或提交周年報表後，相關情況有所變動，請註明。)

Information of Hong Kong or non-Hong Kong group holding company to which the Applicant belongs (e.g. brief introduction of the group holding company, business relationship between the Applicant and the group holding company, whether the group holding company is currently subject to other type(s) of supervision, such as a licence granted by other regulator/competent authority, etc. If there have been any changes since the approval of your last application or submission of annual return, please specify.)

如空位不敷填寫，請詳列於丙部的補充附頁。

Please use the Supplementary Sheet at Part C if the space provided is not adequate.

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Please delete as appropriate

乙部
Part B

打擊洗錢及恐怖分子資金籌集的措施
Anti-Money Laundering and Counter-Terrorist Financing Measures

(1) 政策、程序及管控措施 Policies, procedures and controls			
B.1	<p>就遵從打擊洗錢及恐怖分子資金籌集規定方面，申請人是否已實施充分及適當的政策、程序及管控措施，並以政策綱領或其他書面文件作為證明？</p> <p>Has the Applicant put in place adequate and appropriate policies, procedures and controls to comply with the anti-money laundering and counter-terrorist financing requirements, as evidenced by policy statement(s) or other written documents?</p>	是 Yes <input type="checkbox"/>	No <input type="checkbox"/>
B.2	<p>在與客戶建立業務關係之前或在為客戶執行指明現金交易之前，申請人是否會採取客戶盡職審查措施，以(a)識別及核實(i)客戶和客戶的實益擁有人的身分，及(ii)看似代表客戶行事的人的身分和代表客戶行事的授權；以及(b)取得關於該客戶擬與申請人建立業務關係的目的和性質的資料？</p> <p>Before establishing business relationships or before carrying out specified cash transactions with customers, would the Applicant conduct customer due diligence measures (a) to identify and verify (i) the identity of the customers and their beneficial owners, and (ii) the identity of the persons purporting to act on behalf of the customers and the authority to act on behalf of the customers; and (b) to obtain information on the purpose and intended nature of the business relationships with the Applicant?</p>	是 Yes <input type="checkbox"/>	No <input type="checkbox"/>
B.3	<p>申請人是否會在可引致高度洗錢或恐怖分子資金籌集風險的情況下(例如客戶沒有為身分識別的目的而現身或客戶屬政治人物)執行更嚴格的客戶盡職審查措施？</p> <p>Would the Applicant carry out enhanced customer due diligence measures when dealing with situations which present a high risk of money laundering or terrorist financing (e.g. the customers have not been physically present for identification purposes or the customers are politically exposed persons)?</p>	是 Yes <input type="checkbox"/>	No <input type="checkbox"/>
B.4	<p>申請人是否會採用風險為本的方法持續監察客戶及其交易，以辨別交易是否合申請人對該客戶及其狀況的認知(例如某客戶業務活動及交易額的「正常」水平為何，以辨別「不正常」活動)，及偵測可疑交易？</p> <p>Would the Applicant adopt the risk-based approach to continuously monitor its business relationship with the customers and their transactions, so as to ensure that the business relationship and transactions are consistent with the applicant's knowledge of the customers (e.g. to differentiate the "normal" business activities and transaction size of a particular customer from the "abnormal" ones) and identify suspicious transactions?</p>	是 Yes <input type="checkbox"/>	No <input type="checkbox"/>
B.5	<p>申請人是否已就客戶盡職審查的執行、識別可疑交易的準則、以及打擊洗錢及恐怖分子資金籌集的措施，提供政策或指引給員工參考？</p> <p>Has the Applicant provided staff with policies or guidelines in relation to the conduct of customer due diligence, criteria for identifying suspicious transactions, and relevant anti-money laundering and counter-terrorist financing measures for reference?</p>	是 Yes <input type="checkbox"/>	No <input type="checkbox"/>
<p>如以上 B.1 至 B.5 項中任何一項的答案為「」，請於丙部補充附頁內解釋原因。 If the answer to any of the items B.1 to B.5 is "No", please explain the reasons in the Supplementary Sheet at Part C.</p>			

B.6	<p>申請人現時是否正使用由第三者服務供應商提供的篩查系統，以執行客戶盡職審查程序時識別政治人物及列入資助恐怖主義和擴散資金籌集制裁名單的人士？</p> <p>Is the Applicant currently using screening system provided by a third party service provider for identifying politically exposed persons and the persons designated on the terrorist financing and proliferation financing sanctions list during the customer due diligence procedures?</p>	<p>是 Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p><input type="checkbox"/></p>
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請注意： 使用第三方篩查系統， 不能免除申請人的法律責任。申請人仍須承擔確保符合盡職審查規定的最終責任。

Attention : Use of a third-party screening system does not relieve the Applicant of legal responsibility. The Applicant remains ultimately responsible for ensuring full compliance with customer due diligence requirements.

如答案為「是」，請提供篩查系統的名稱：
If the answer is “Yes”, please provide the name of the screening system:

如答案為「否」，請說明申請人過往如何確保完全符合客戶盡職審查要求。申請人可能需要提供資料以證明該等要求已獲全面遵守。

If the answer is “No”, please explain how the Applicant has ensured full compliance with customer due diligence requirements in the past. The Applicant may be required to provide information to demonstrate full compliance with the requirements.

如空位不敷填寫，請詳列於丙部的補充附頁。
Please use the Supplementary Sheet at Part C if the space provided is not adequate.

B.9	<p>申請人是否已訂立機制或程序，藉以根據《有組織及嚴重罪行條例》(第 455 章)、《販毒(追討得益)條例》(第 405 章)及《聯合國(反恐怖主義措施)條例》(第 575 章)的要求向聯合財富情報組提交可疑交易報告?</p> <p>Has the Applicant put in place a system or procedures to submit suspicious transaction reports to the Joint Financial Intelligence Unit as required under the Organized and Serious Crimes Ordinance (Cap. 455), Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405) and United Nations (Anti-Terrorism Measures) Ordinance (Cap. 575)?</p>	<p>是 Yes <input type="checkbox"/></p>	<p>No <input type="checkbox"/></p>
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如答案為「是」，請詳述申請人目前的報告可疑交易的機制或程序。如註冊續期申請獲批准，申請人在新註冊期內，將如何提高可疑交易報告機制或程序的成效？如答案為「否」，請解釋原因。

If the answer is “Yes”, please elaborate on the Applicant’s current system or procedures for reporting suspicious transactions. If the renewal application for registration is granted, how will the Applicant enhance the effectiveness of the suspicious transaction reporting system or procedures during the new registration period? If the answer is “No”, please explain the reasons.

如空位不敷填寫，請詳列於丙部的補充附頁。

Please use the Supplementary Sheet at Part C if the space provided is not adequate.

B.10	<p>申請人是否已就防止及偵察洗錢及恐怖分子資金籌集事宜向員工提供合適的培訓，包括加深他們了解在業務上針對打擊洗 及恐怖分子資金籌集的措施的培訓，並備存培訓的紀錄？</p> <p>Has the Applicant provided staff with appropriate training on prevention and detection of money laundering and terrorist financing activities, including training to raise their awareness of business practices against money laundering and terrorist financing, and maintained records of such training?</p>	<p>是 Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p><input type="checkbox"/></p>
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如答案為「是」，請詳述申請人的員工及管理層至今曾接受過打擊洗錢及恐怖分子資金籌集的培訓。如註冊續期申請獲批准，申請人在新註冊期內，將如何加強打擊洗錢及恐怖分子資金籌集培訓？如答案為「」，請解釋原因。

If the answer is “Yes”, please elaborate on the anti-money laundering and counter-terrorist financing (AML/CTF) training received by the staff and management to date. If the renewal application for registration is granted, how will the Applicant plan to enhance the AML/CTF training in the new registration period? If the answer is “No”, please explain the reasons.

如空位不敷填寫，請詳列於丙部的補充附頁。

Please use the Supplementary Sheet at Part C if the space provided is not adequate.

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Please delete as appropriate

(2) 主要人員 Key Personnel			
B.11 高級管理監督人員的詳情 Particulars of personnel responsible for senior management oversight			
英文姓名 (*先生/太太/小姐/女士) Name in English (*Mr/Mrs/Miss/Ms)	(先寫姓氏後寫名字 Surname first then other names)		
中文姓名 (如適用) Name in Chinese (if applicable)			
在公司擔任的職位 Position in Company	<input type="checkbox"/> 獨資經營者/小販持牌人 Sole Proprietor/Licensed Hawker <input type="checkbox"/> 合夥人 Partner <input type="checkbox"/> 董事 Director <input type="checkbox"/> 經董事局授權的高級管理職員 Senior management staff authorized by the board of directors 職位 Position _____		
直接聯絡電郵^ Direct Contact Email^		流動電話號碼^ Mobile Phone No.^	
聯絡地址 (常駐辦公地點)^ Contact Address (Regular Workplace)^			
備註: 若高級管理監督人員為經董事局授權的高級管理職員, 請(a)提供經董事局簽署的授權書; 及(b)於以下B.12提供一名董事的詳情。 Remarks: If the personnel responsible for senior management oversight are senior management staff authorized by the board of directors, please provide (a) an authorization letter signed by the board of directors; and (b) particulars of one director in B.12 below.			
B.12 一名董事的詳情 Particulars of one director			
英文姓名 (*先生/太太/小姐/女士) Name in English (*Mr/Mrs/Miss/Ms)	(先寫姓氏後寫名字 Surname first then other names)		
中文姓名 (如適用) Name in Chinese (if applicable)			
直接聯絡電郵^ Direct Contact Email^		流動電話號碼^ Mobile Phone No.^	
聯絡地址 (常駐辦公地點)^ Contact Address (Regular Workplace)^			
B.13 合規主任的詳情 Particulars of the Compliance Officer (CO)			
英文姓名 (*先生/太太/小姐/女士) Name in English (*Mr/Mrs/Miss/Ms)	(先寫姓氏後寫名字 Surname first then other names)		
中文姓名 (如適用) Name in Chinese (if applicable)			
在公司擔任的職位 Position in Company			
直接聯絡電郵^ Direct Contact Email^		流動電話號碼^ Mobile Phone No.^	
聯絡地址 (常駐辦公地點)^ Contact Address (Regular Workplace)^			
備註: (a) 合規主任應通常常駐香港; 及 (b) 如有超過一名合規主任, 請影印本頁, 以填寫其他合規主任的詳情。 Remarks: (a) The CO shall normally be based in Hong Kong; and (b) If you have more than one CO, please make a photocopy of this page for filling in the particulars of the other CO.			

B.14	洗錢報告主任的詳情 Particulars of the Money Laundering Reporting Officer (MLRO)			
請述明合規主任是否同時獲委任為洗錢報告主任： Please indicate whether the CO is also appointed as the MLRO:				
<input type="checkbox"/> 是 Yes <input type="checkbox"/> No (如「」，請提供洗 報告主任的詳情，而洗錢報告主任應通常常駐香港。)				
(If "No", please provide MLRO's particulars, and the MLRO shall normally be based in Hong Kong)				
英文姓名 (*先生/太太/小姐/女士) Name in English (*Mr/Mrs/Miss/Ms)				
	(先寫姓氏後寫名字 Surname first then other names)			
中文姓名 (如適用) Name in Chinese (if applicable)				
在公司擔任的職位 Position in Company				
直接聯絡電郵^ Direct Contact Email^		手提電話號碼^ Mobile Phone No.^		
聯絡地址 (常駐辦公地點)^ Contact Address (Regular Workplace)^				

B.11 – B.14 備註 ^:	申請人於表格2 - 「貴金屬及寶石交易商B類註冊續期申請」所填報的電郵、電話號碼及主要營業地點的地址依然為本署向申請人發放任何正式通知之用。根據此「範本」所額外提供的直接聯絡電郵、手提電話號碼及聯絡地址 常駐辦公地點，主要是讓本署就B類續期獲批後及時跟進申請人的貴金屬及寶石交易的合規情況。
B.11 – B.14 Remarks ^:	The Department will still disseminate official notification(s) through the email, telephone number and the address of the principal place of business provided by the Applicant in the Form 2 – “Application for Renewal of a Dealer in Precious Metals and Stones Category B Registration”. The additional direct contact email, mobile phone number and contact address (regular workplace) as requested in this Proforma, are to primarily facilitate this Department to follow up on the Applicant’s compliance situation promptly upon renewal of the Category B registration.

就 _____ 項提交的補充資料：

Supplementary information for item _____ :

為展示申請人已實施各項備存紀錄措施，申請人已按附錄的示例，夾附一份共_____頁的備存紀錄圖冊。

In order to demonstrate that the Applicant's record-keeping measures have been in place, the Applicant has attached the Album of Record-Keeping consisting of _____page(s) by following the sample as shown in the Appendix.

*申請人/獲授權的合人 /獲授權的董事或高級管理職員
簽署及公司印章

*Signature of the Applicant/authorized partner of the
partnership/authorized director or senior management staff of
the corporation and company chop

姓名(正楷)
Name in block letters

日期
Date

備存紀錄圖冊
Album of Record-Keeping
 (示例 Sample)

申請人姓名/名稱 Name of Applicant	Ocean Pearl Goldsmith 海珠寶金行
貴金屬及寶石交易商 B 類註冊號碼 DPMS Category B Registration No.	B-B-23-04-XXXXX

業務處所 / 網上資料**Business Premises/Online information**

<p>1. 註冊人主要營業地點及所有其他業務處所¹ 正門的照片並標明地址，照片須清晰顯示載有註冊人資料(例如商號名稱)的招牌，以及展示中的註冊證明書 / 分行證明書(如適用) Photos of main entrance(s) of the principal place of business and all other business premises¹ of the registrant marked with the address(es) showing signboard(s) depicting registrant's particulars (e.g. trading name) and the certificate of registration / branch certificate(s) (where applicable) displayed</p> <p>2. 處所內部的照片(特別是存放註冊相關文件及紀錄的地方) 標明地址 Photos showing the interior of the premises (especially where registration-related documents and records are stored) marked with address(es)</p> <p>3. 網上展示註冊資料的相關截圖或畫面照片(如適用) Photos showing the display of registration information online (where applicable)</p>		
		
主要營業地點：九龍旺角彌敦道 XX 號地下 Principal place of business: G/F, XX Nathan Road, Mong Kok, Kowloon	業務處所(儲存文件)：九龍旺角彌敦道 YY 號 好生意大廈 8 樓 C 室 Business premises (storage of documents): Flat C, 8/F, Good Business Building, YY Nathan Road, Mong Kok, Kowloon	網站 Website: https://www.xxx.oceanpearl.com.hk

¹ 據香港法例第 615 章《打擊洗錢及恐怖分子資金籌集條例》(「條例」) 第 53ZTZ 條，「業務處所」指註冊人經營貴金屬及寶石業務所在的任何處所，包括用作以下用途的處所—

- a) 與客戶進行面對面交易；
- b) 該註冊人的事務或業務的行政管理；
- c) 處理交易；或
- d) 儲存文件、數據或紀錄。

申請人須於 **表格 2 - 「貴金屬及寶石交易商 B 類註冊續期申請」** 填報

Pursuant to section 53ZTZ of the Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Chapter 615 (“AMLO”), Laws of Hong Kong, “business premises” means any premises at which the registrant carries on a precious metals and stones business, including any premises used for the purpose of—

- (a) the carrying out of face-to-face transactions with customers;
- (b) the administration of the affairs or business of the registrant;
- (c) the processing of transactions; or
- (d) the storage of documents, data or records.

The applicant must report them in the **Form 2 - Application for Renewal of a Dealer in Precious Metals and Stones Category B Registration**.

備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

所需照片 / 文件 / 紀錄**Required photos/documents/records**

海關備註：以下文件清單並非詳盡無遺，清單僅作一般性參考。B類註冊人可提供進一步補充資料，以展示其具備打擊洗錢及恐怖分子資金籌集(AML/CTF)的能力。

Notes from Customs: *The documents listed below are not exhaustive and intended to serve as general reference. Category B registrants can provide further supplementary information to demonstrate their AML/CTF competency.*

(1) 顯示實體 / 電子檔案的照片，該些檔案須包含—

Photos showing that there are physical / electronic files in place which include –

(a) 打擊洗錢及恐怖分子資金籌集 AML/CTF 的政策、程序及管控措施(「打擊洗錢 / 恐怖分子資金籌集制度」)，包括：

Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) Policies, Procedures and Controls (AML/CTF Systems), including:

- 經高級管理層 / 董事局批准的打擊洗錢及恐怖分子資金籌集的政策綱領
AML/CTF Policy Statement with senior management / Board of Directors approval
- 公司架構、業務性質、僱員人數、其他管治安排及客戶風險狀況
Company structure, business nature, number of employees, other governance arrangements and risk profile of customers
- 高級管理監督人員、合規主任、洗錢報告主任及相關人員的打擊洗錢 / 恐怖分子資金籌集的職責
AML/CTF responsibilities of Senior Management Oversight, Compliance Officer, Money Laundering Reporting Officer and related staff

(b) 打擊洗錢及恐怖分子資金籌集的措施，包括：

Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF) Measures, including:

- 採用風險為本的方法(RBA)，以進行洗錢及恐怖分子資金籌集(ML/TF)的風險評估
Risk-Based Approach (RBA) for conducting money laundering and terrorist financing (ML/TF) risk assessment
- 執行客戶盡職審查(CDD)措施、篩查政治人物(PEP 篩查)、篩查恐怖分子 / 被聯合國安全理事會所決定制裁的個人及實體(制裁篩查)、處理高風險司法管轄區 / 情況；及執行更嚴格的客戶盡職審查(EDD)措施的程序
Procedures for conducting Customer Due Diligence (CDD) measures; screening politically-exposed persons (PEP screening); screening terrorists / designated persons and entities sanctioned by the United Nations Security Council (sanctions screening); handling high-risk jurisdictions/situations; and conducting Enhanced Customer Due Diligence (EDD) measures
- 對業務關係及交易的持續監察
Ongoing monitoring of business relationships and transactions
- 內部識別與報告可疑交易，以及向聯合財富情報組(JFIU)提交可疑交易報告(STR)的程序
Procedures for identifying and reporting suspicious transactions internally and submitting Suspicious Transaction Reports (STRs) to the Joint Financial Intelligence Unit (JFIU)
- 備存紀錄的程序
Procedures for record-keeping
- 打擊洗錢及恐怖分子資金籌集 AML/CTF 的職員及管理層培訓
AML/CTF training for employees and management Staff

(夾附實體 / 電子檔案的照片)

Photos of physical/electronic files attached)

上述文件已備妥，可供海關查閱。

The above documents are ready for Customs inspection.

備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(2) 展示**客戶盡職審查(CDD)**措施已落實的紀錄，注意 —
 Records demonstrating that the **Customer Due Diligence (CDD)** measures are in place, noting that -

(a) 對**個人客戶**的客戶盡職審查措施一般包括，但不限於：-

In general, CDD measures on **Individual Customer** include, but not limited to:-

- 識別及核實客戶身分及篩查客戶是否屬高度洗錢或恐怖分子資金籌集風險的情況 例如政治人物、恐怖分子或被聯合國安全理事會所決定制裁的個人及實體，例如：
 Identification and verification of the identity of the customer, and screening for high risk situations (e.g. PEP, terrorists or designated persons and entities sanctioned by the United Nations Security Council), e.g.
 - 客戶身分 Customer identity
 - 篩查紀錄 Screening record
- 持續監察
 Ongoing monitoring

(b) 對**公司客戶**的客戶盡職審查措施一般包括，但不限於：-

In general, CDD measures on **Business Customer** include, but not limited to:-

- 識別及核實有關實體的身分及篩查其是否屬高度洗錢或恐怖分子資金籌集風險的情況 例如政治人物、恐怖分子或被聯合國安全理事會所決定制裁的個人及實體，例如：
 Identification and verification of the identity of the related entities, and screening for high risk situations (e.g. PEP, terrorists or designated persons and entities sanctioned by the United Nations Security Council), e.g.
 - 客戶身分
 Customer identity
 - 實益擁有人(BO)的識別與身分
 Beneficial owner(s) (BO) identification and identity
 - 看似是代表客戶行事的人(PPTA)的身分
 Person purporting to act on behalf of customer (PPTA) identity
 - 看似是代表客戶行事的人(PPTA)的授權及核實
 PPTA's authority and verification
 - 客戶、每位實益擁有人(BO)及看似是代表客戶行事的人(PPTA)的篩查記錄
 Customer's, each BO's and PPTA's screening records
- 持續監察
 Ongoing monitoring

備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(夾附過去三年內就一宗「指明現金交易」所執行的一份完整且準確的個人客戶的客戶盡職審查(CDD)紀錄(如有))

(One complete and accurate CDD record of an **individual customer** (if any) performed in the past 3 years relating to a specified cash transaction attached)

其他紀錄已備妥，可供海關查閱。

Other records are ready for Customs inspection.

(Reference: https://www.youtube.com/watch?v=eVlh_tWCZqc * starting at 1:35)



備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(夾附過去三年內就一宗「指明現金交易」所執行的一份完整且準確的公司客戶的客戶盡職審查(CDD)紀錄(如有))

(One complete and accurate CDD record of a **business customer** (if any) performed in the past 3 years relating to a specified cash transaction attached)

其他紀錄已備妥，可供海關查閱。

Other records are ready for Customs inspection.

(Reference: https://www.youtube.com/watch?v=eVIh_tWCZqc * starting at 1:35)



董事：何小明
實益擁有人：李小輝

海珠寶金行 日期 2025年9月23日		銷售單據 000_XXX 時間 15:15
貨品	金額	
金條 一條	\$520,000HKD	
成色：999千足純金 重量~~~兩，飾工\$~~~ 金價每兩\$~~~~，佣金~~%		
客戶：金銀發有限公司(by cash) 合計	\$520,000HKD	
銷售人員：王大海		



備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(3) 展示更嚴格的客戶盡職審查(EDD)措施已落實的紀錄，並注意——

A record demonstrating that **Enhanced Customer Due Diligence (EDD)** measures are in place, noting that -

針對構成高度洗錢 / 恐怖分子資金籌集(ML/TF)風險的情況，或指明情況下所採取的更嚴格的客戶盡職審查措施(EDD)，包括：

EDD measures in relation to a situation that by its nature may present a high ML/TF risk or specified circumstances, include:

- 有關財富來源及資金來源的資料
Information on the source of wealth and source of funds
- 其他更嚴格的客戶盡職審查措施 (如適用)
Other EDD measures (where applicable)
- 高級管理層的批准
Senior management's approval
- 更嚴格的業務關係及交易的持續監察
Enhanced ongoing monitoring of business relationships and transactions

(夾附過去三年內就一宗「指明現金交易」所執行的一份完整且準確的更嚴格的客戶盡職審查(EDD)紀錄(如有)，並提供有關所涉及高風險情況的陳述)

(One complete and accurate EDD record performed in the past 3 years relating to a specified cash transaction attached (if any) with the high-risk situation mentioned)

其他紀錄已備妥，可供海關查閱。

Other records are ready for Customs inspection.

(4) 展示註冊人已實施風險評估的實體 / 電子檔案的照片，並注意——

Photos showing that there are physical / electronic files capturing the registrant's **risk assessment** are in place, noting that -

打擊洗錢 / 恐怖分子資金籌集制度(AML/CTF)中風險為本的方法(RBA)，包括：

Risk-Based Approach (RBA) for the AML/CTF systems, including:

- 進行機構層面的風險評估 例如客戶、產品、交易
conducting institutional risk assessment (such as customers, products, transactions)
- 以風險為本的方法，進行客戶盡職審查(CDD)及更嚴格的客戶盡職審查(EDD)，以及監察業務關係及交易
RBA for CDD, EDD and monitoring business relationships and transactions
- 高級管理層審批對洗錢及恐怖分子資金籌集(ML/TF) 的風險評估結果
Senior Management Approval of ML/TF risk assessment results
- 覆核及更新洗錢及恐怖分子資金籌集風險評估的框架
Review and update of ML/TF risk assessment framework

(夾附實體 / 電子檔案的照片)

Photos of physical/electronic files attached)

上述文件已備妥，可供海關查閱。

The above documents are ready for Customs inspection.

備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(5) 展示註冊人已實施**指明現金交易(SCTs)及交易監察機制的實體/電子檔案的照片**，注意 —
 Photos showing that there are physical / electronic files capturing the registrant's **specified cash transactions (SCTs) and transaction monitoring mechanism**, noting that -

(a) 指明現金交易(SCTs) · 包括：

Specified Cash Transactions (SCTs), including:

- 交易性質及特點 例如：所牽涉的產品及交易對手、交易性質、交易量、交易規模、交易模式及其複雜程度
 Transaction details and characteristics (e.g. the products and counterparties involved, and the nature, volume, size, pattern and complexity of transactions)

(b) 交易監察系統及程序 · 包括：

Transaction Monitoring Systems and Processes, including:

- 方式 · 例如人工處理及自動化程度、科技應用情況及所採用的模式
 Method such as the degree of manual processes, automation, use of technology and the model adopted
- 因素 · 例如相關參數及門檻、預警指標及決定採用該系統的理由
 Factors such as the underlying parameters, thresholds, alert indicators and rationale for adopting the systems
- 監察程度 · 例如監察的頻密程度及強度
 Extent of monitoring such as frequency and intensity of scope in monitoring
- 上報機制及減低風險措施
 Escalation mechanism and risk mitigating measures
- 定期對系統及程序作出覆核
 Regular review of the systems and processes

(夾附實體 / 電子檔案的照片)

Photos of physical/electronic files attached)

上述文件已備妥，可供海關查閱。

The above documents are ready for Customs inspection.

(6) 展示註冊人已實施**報告可疑交易機制的實體 / 電子檔案的照片**，包括—
 Photos showing that there are physical / electronic files capturing the registrant's mechanism for **reporting suspicious transactions**, which should include -

- 識別異乎尋常及可疑交易的方法 例如：紅旗指標
 Approach for identifying unusual and suspicious transactions (such as red flag indicators)
- 報告異乎尋常及可疑交易的程序
 Approach for reporting unusual and suspicious transactions

(夾附實體 / 電子檔案的照片)

Photos of physical/electronic files attached)

上述文件已備妥，可供海關查閱。

The above documents are ready for Customs inspection.

備存紀錄圖冊
Album of Record-Keeping
(示例 Sample)

(7) 展示註冊人已實施**職員培訓**的紀錄，並注意—

A record demonstrating that the registrant's **staff training** is in place, noting that -

打擊洗錢及恐怖分子資金籌集(AML/CTF)培訓，包括：

AML/CTF training should include -

- 培訓課程的類型、範圍、內容、頻密程度、培訓方式 (以及參與的職員與管理層的類別)
The type, scope, content, frequency, delivery methods of training programme (with categories of employees/management involved)
- 培訓紀錄的備存
Keeping of training record
- 打擊洗錢及恐怖分子資金籌集持續培訓的計劃及監察培訓成效的方法
Ongoing AML/CTF training plan and monitoring of the effectiveness of training

(夾附一份過去三年內的培訓紀錄，顯示日期、主題、地點及參與人員。)

(One training record showing the date, subject, venue and participants in the past three years attached)

其他載有職員培訓紀錄及檔案已備妥，可供海關查閱。

Other records and files containing staff training matters are ready for Customs inspection.