Plutus Securities Limited
貝德斯證券有限公司

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Licensed Corporation with the Securities and Future Commission ("SFC") (CE No. BNJ530) and Exchange Participant of The Stock Exchange of Hong Kong Ltd.
為證券及期貨事務監察委員會（"證監會"）註冊之持牌法團（CE 編號 BNJ530）及香港聯合交易所有限公司參與者。

# Anti-Money Laundering and Counter-Financing of Terrorism Questionnaire – Financial Institution

# 打擊洗錢及恐怖分子資金籌問卷 – 金融機構

Client Name:
客戶姓名:

| A) General AML Policies, Practices and Procedures<br>一般反洗錢政策、做法和程序 | 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?<br>金融機構的監管機構是否發出指引/政策/法律，以打擊洗錢/恐怖份子融資，而金融機構是受到監管，並且完全符合相關法律規定? | | |
| 2) Is the AML compliance program approved by the FI's board or a committee formed by senior management?<br>打擊洗錢的合規計劃是否由金融機構的董事會或由管理層組成的委員會批准? | | |
| 3) Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?<br>金融機構是否有法律和合規計劃，包括指定一位人員負責協調和監督打擊洗錢框架? | | |
| 4) Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?<br>金融機構是否制定了書面政策，記錄其已實施的程序，以防止、檢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?<br>除了政府主管/監管機構的檢查外，金融機構客戶是否有內部審計職能或其他獨立第三方定期對打擊洗錢政策和做法進行評估? | | |
| 6) Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)<br>金融機構是否有政策禁止為空殼銀行開立賬戶/及建立業務關係? (空殼銀行被定義為在銀行沒有實體存在的司法管轄區註冊成立，亦與受監管的金融集團無關)。 | | |
| 7) Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?<br>金融機構是否有制訂政策以合理地確保它不會與空殼銀行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?<br>金融機構是否有制訂政策涵蓋了政治敏感人士、其家庭成員和緊密聯繫人? | | |
| 9) Does the FI have record retention policies/procedures that comply with applicable law?<br>金融機構是否依法律規定而制訂了適當的文件保存年限政策/作業準則? | | |

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| | | |
|---|---|---|
| 10) Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?<br>金融機構是否要求其在國內及境外地區的所有分公司以及附屬機構，遵守其總部的打擊洗錢政策及作業規章? | | |
| 11) Does the FI manage or administer the subject account with us as agent on behalf of various individual clients and the funds are co-mingled in the subject account?<br>金融機構是否代表各個客戶以代理方式管理或管理主事帳戶，並將資金與主事帳戶相結合? | | |
| 12) Hasn't the FI been subjected to sanctions or punitive actions in relation to anti-money laundering/terrorist financing by regulators/law enforcer in the past five years?<br>在過去的五年，金融機構沒有受到監管機構/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? | | |

| **B) Risk Assessment<br>風險評估** | **YES 是** | **NO 否** |
|---|---|---|
| 13) Does the FI have a risk-based assessment of its customer base and their transactions?<br>金融機構是否有對其客戶及客戶交易活動進行風險評估? | | |
| 14) Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?<br>對於有理由相信涉及高風險違法活動的客戶和交易，金融機構是否制訂適當程度的增強盡職審查? | | |

| **C) Know Your Customer, Due Diligence and Enhanced Due Diligence<br>瞭解您的客戶(KYC)、盡職審查及增強盡職審查** | **YES 是** | **NO 否** |
|---|---|---|
| 15) Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?<br>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? | | |
| 16) Does the FI have a requirement and procedure to collect information regarding the nature of business activities, source of wealth and source of funds of its customer?<br>金融機構有否有要求和程序蒐集其客戶的業務性質、財富來源及資金來源的資料? | | |
| 17) Does the FI assess its FI customers' AML policies or practices?<br>金融機構有否評估其金融機構客戶的打擊洗錢政策及處理規章? | | |
| 18) Does the FI have on-going processes to review and, where appropriate, update customer information?<br>金融機構是否有持續的流程審查並在適當時更新的資料? | | |
| 19) Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?<br>金融機構是否有程序為每個新客戶建立存檔記錄，在開設帳戶時所蒐集的身分證明文件及"認識您的客戶"資訊? | | |
| 20) Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?<br>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? | | |

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| | | |
|---|---|---|
| 21) Does the FI have a requirement to collect information regarding the customers' tax residency and tax compliance status (including FATCA) ?<br>金融機構有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〈海外帳戶稅收法案〉FATCA)? | | |

| **D) Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds<br>申報交易，防止及偵察透過非法取得的資金進行交易活動** | **YES 是** | **NO 否** |
|---|---|---|
| 22) Does the FI have policies or practices for identifying and reporting of transactions that are suspicious or required to be reported to the authorities?<br>就可疑或需要向當局申報的交易，金融機構是否有鑑別和申報的政策或作業規章? | | |
| 23) Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?<br>對於某些刻意作出調整以迴避需呈報的大額現金交易，金融機構是否有程序以資識別? | | |
| 24) Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?<br>金融機構會否篩選經政府/國際組織公布名單中的個人、實體或國家的客戶和其交易? | | |
| 25) Does the FI have policies to reasonably ensure that it only operates with FI that possess licenses to operate in their countries of origin?<br>金融機構是否有政策合理地確保只與在其原居地管轄範圍內持有營業執牌照的金融機構合作? | | |

| **E) Transaction Monitoring<br>交易監控** | **YES 是** | **NO 否** |
|---|---|---|
| 26) Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and stock transfer etc?<br>金融機構是否有針對異常和有可疑的交易活動（包括資金轉移及股票轉移等等）的監控程序? | | |

| **F) AML Training<br>打擊洗錢培訓** | **YES 是** | **NO 否** |
|---|---|---|
| 27) Does the FI provide AML training to relevant employee that includes:<br>金融機構有否為相關的員工提供打擊洗錢培訓，包括:<br>• Identification and reporting of transactions that must be reported to regulatory authorities<br>辨別及報告必須向監管當局呈報的交易<br>• Examples of different forms of money laundering involving the FI's products and services<br>各種涉及金融機構產品及服務的不同形式洗錢示例<br>• Internal policies to prevent money laundering<br>防止洗錢的內部政策 | | |
| 28) Does the FI retain records of its training sessions including attendance records and relevant training materials used?<br>金融機構有否保留其培訓課程的記錄，包括出席記錄及相關的培訓教材? | | |

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| | | |
|---|---|---|
| 29) Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?<br>金融機構會否將有關打擊洗錢而定的新法律或現有打擊洗錢有關的政策及作業規章之更改與其相關員工溝通? | | |
| 30) Does the FI employ third parties to carry out some of the functions of the FI?<br>金融機構有否聘用第三方執行某部分職能? | | |
| 31) If the answer to question 30 is "yes", does the FI provide AML training to relevant third parties that includes:<br>如在問題 30 回答為"是"，金融機構有否為相關的第三方提供打擊洗錢培訓，包括:<br>• Identification and reporting of transactions that must be reported to regulatory authorities<br>辨別及報告必須向監管當局呈報的交易<br>• Examples of different forms of money laundering involving the FI's products and services<br>各種涉及金融機構產品及服務的不同形式洗錢示例<br>• Internal policies to prevent money laundering<br>防止洗錢的內部政策 | | |

| **Space for additional information (Please indicate which question information is referring to)**<br>**請在下列空白欄位填上補充資料 (請註明補充資料相關問題的題號)** |
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| |

| **Client signature with Company Chop:**<br>**客戶簽署名及公司印章:** |
|---|
| **Name:**<br>**姓名:** |
| **Title:**<br>**職銜:** |
| **Date:**<br>**日期:** |