



PLUTUS SECURITEIS LIMITED

貝德斯證券有限公司

(Exchange Participant of The Stock Exchange of Hong Kong Limited) SFC CE NO. BNJ530

8/F., 80 Gloucester Road Wanchai, Hong Kong

香港灣仔告士打道 80 號 8 樓

Tel 電話 (852) 2968 1192 Fax 傳真 (852) 2968 5560

Anti-Money Laundering Questionnaire

反洗錢問卷

Client Name 客戶名稱: _____

Account Number 戶口號碼 (if applicable(如適用)): _____

If you answer “No” to any question, additional information can be supplied at the end of the questionnaire. 如果您對任何問題回答“否”，可在問卷調查結束時提供其他信息。

I. General AML Policies, Practices and Procedures

一般反洗錢政策，做法和程序

1. Is the AML compliance program approved by the Financial Institution (“FI”)’s board or a senior committee? 是否反洗錢合規方案已經由金融機構(“FI”)董事會或高級委員會批准?

Yes 是 No 否

2. 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? FI 是否有法律和法規遵從方案，包括指定人員負責協調和監督反洗錢框架?

Yes 是 No 否

3. Has the FI developed written policies documenting the processes that they have in place to

prevent, detect and report suspicious transactions? FI 是否制定了書面政策，記錄其制定的流程以防止，檢測和報告可疑交易？

Yes 是 No 否

4. 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? 除了政府主管/監管機構的檢查外，FI 客戶是 否有內部審計職能或其他獨立第三方定期對反洗錢政策和做法進行評估？

Yes 是 No 否

5. 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.) FI 是否有政策禁止為空殼銀行建賬戶/關係的？（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）。

Yes 是 No 否

6. 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? FI 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？

Yes 是 No 否

7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates? FI 是否有制訂政策以監管政治人士，其家庭成員和緊密關係的夥伴？

Yes 是 No 否

8. Does the FI have record retention procedures that comply with applicable law? FI 是否有制訂
依法律規定的適當檔保存年限作業準則?

Yes 是 No 否

9. 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? FI 是否要求其在國內
及境外地區的所有分行以及附屬機構，遵守其總部的反洗黑錢政策及作業規章?

Yes 是 No 否

10. Does the FI manage or administer the subject account with us as agent on behalf of various
individual clients and that the funds are co- mingled in the subject account? FI 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?

Yes 是 No 否

11. Does the FI regulated by any financial or monetary authorities (e.g. SFC, HKMA) or
professional bodies? If yes, please provide name of regulators / bodies. FI 是否由財政或貨幣
當局(例如證監會，金管局)或專業團體監管? 如果是，請提供監 管者/機構的名稱。

Yes 是 No 否

II. Risk Assessment:

風險評估

1. Does the FI have a risk-based assessment of its customer base and their transactions? FI 是否有對其客戶及客戶交易活動進行風險評估?

Yes 是 No 否

2. 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? FI 是否有針對涉及高風險違法活動的客戶和交易制訂進行適當程度的強化盡職調查工作?

Yes 是 No 否

III. Know Your Customer, Due Diligence and Enhanced Due Diligence:

瞭解您的客戶(KYC)、盡職調查及強化盡職調查工作

1. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? FI 是否有訂定鑒別客戶身分的辦法，於開設帳戶及進行交易時鑒定客戶資訊?

Yes 是 No 否

2. Does the FI have a requirement to collect information regarding its customers' business activities? FI 有否有要求蒐集關於客戶業務活動的資料?

Yes 是 No 否

3. Does the FI assess its FI customers' AML policies or practices? FI 有否評估其金融機構客戶的防洗錢政策及處理規章?

Yes 是 No 否

4. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? FI, 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?

Yes 是 No 否

5. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? FI 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?

Yes 是 No 否

6. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? 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?

Yes 是 No 否

7. Does the FI have a requirement to collect information regarding the customers' tax residency and tax compliance status (including FATCA) 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)?

Yes 是 No 否

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

須報告的交易, 防止及偵察透過非法取得的資金進行的交易活動

1. 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？

Yes 是 No 否

2. 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，FI 是否有作業準則進行辨別？

Yes 是 No 否

3. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? FI 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？

Yes 是 No 否

4. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin? 是否有政策合理地保證只與擁有牌照的相關銀行在當地國家地區合作？

Yes 是 No 否

V. Transaction Monitoring

交易監控

1. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers, monetary instruments (travelers checks, money orders and so on) and stock transfer etc? FI 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、貨幣工具(如 旅行支票，匯票等)及股票轉移等等)

Yes 是 No 否

VI. AML Training

員工培訓：

1. Does the FI provide AML training to relevant employees that includes: FI 有否為相關的員工提供防止洗錢培訓，此等培訓包括:

- Identification and reporting of transactions that must be reported to government authorities
辨別及報告某些需要向政府部門呈報的交易

- Examples of different forms of money laundering involving the FI's products and services
各種牽涉金融機構產品及服務的不同形式洗錢活動

- Internal policies to prevent money laundering 內部的防止洗錢政策

Yes 是 No 否

2. Does the FI retain records of its training sessions including attendance records and relevant training materials used? FI 有否保留其培訓課程的各項記錄，包括出席記錄及所用教材?

Yes 是 No 否

3. 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，

FI 是否有制訂政策向其相關員工 作宣導溝通?

Yes 是 No 否

4. Does the FI NOT employ third parties to carry out some of the functions of the FI? FI 有否將部分業務外包出去?

Yes 是 No 否

5. If the answer to part V question 1 is NO, does the FI provide AML training to relevant third parties that includes: 如果第 5 部分問題 1 的回答為“是”，金融機構有否為外包公司提供防止洗錢培訓，此等培訓包括:

- Identification and reporting of transactions that must be reported to government authorities
辨別及報告某些需要向政府部門呈報的交易

- Examples of different forms of money laundering involving the FI's products and services
各種牽涉金融機構產品及服務的不同形式洗錢活動

- Internal policies to prevent money laundering 內部的防止洗錢政策

Yes 是 No 否

Space for additional information 請在下列空白欄位填上補充資料:

(Please indicate which question the information is referring to. 請註明補充資料相關問題的題號.)

Source of Fund 資金來源: _____

Signature 簽署: _____

Name 姓名: _____

Title 職稱: _____

Date 日期: _____