

APPLICATION BY A COMPANY FOR RENEWAL OF A MONEY LENDERS LICENCE

Supplementary Information Sheet (Form SIS-3) (Note 1)

Section 1 : Company Basic Information (Note 2)

Name of the licensee	
MLR Number	
Business Registration Number <i>(please provide the first 8 digits)</i>	
Contact person <i>(mainly for the information completed on this form)</i>	Name : Telephone No. : Email Address :
Company type	<input type="checkbox"/> Listed company <input type="checkbox"/> Public company <input type="checkbox"/> Private company
Email address	
Website address	
Number of staff (including director, and any full-time and part-time staff who participate in daily operation of the company)	Full time: Part-time:
Major types of customer loans	<input type="checkbox"/> Unsecured personal loans <input type="checkbox"/> Other unsecured loans <input type="checkbox"/> Secured loans (excluding property mortgage loan) <input type="checkbox"/> Property mortgage loans <input type="checkbox"/> Others (please specify)
Major source of funding	<input type="checkbox"/> Bank borrowings <input type="checkbox"/> Shareholders' funds <input type="checkbox"/> Debt instruments <input type="checkbox"/> Intra-conglomerate borrowings <input type="checkbox"/> Other liabilities (please specify)
Sources of new customers	<input type="checkbox"/> Introduction / referral <input type="checkbox"/> Walk-in <input type="checkbox"/> Others (please specify)
Subsidiary or related entity of a licensed corporation under the Securities and Futures Ordinance (Cap. 571) ("SFO")	<input type="checkbox"/> Yes, subsidiary of <input type="checkbox"/> Yes, related entity of Name of the licensed corporation(s): <input type="checkbox"/> No
Subsidiary or related entity of an authorized institution <small>(Note 3)</small> under the Banking Ordinance (Cap.155)	<input type="checkbox"/> Yes, subsidiary of <input type="checkbox"/> Yes, related entity of Name of the authorized institution(s): <input type="checkbox"/> No
Subsidiary or related entity of an insurance company <small>(Note 4)</small>	<input type="checkbox"/> Yes, subsidiary of <input type="checkbox"/> Yes, related entity of Name of the insurance company(ies): <input type="checkbox"/> No
Subsidiary or related entity of an approved trustee <small>(Note 5)</small> under the Mandatory Provident Fund Schemes Ordinance (Cap. 485)	<input type="checkbox"/> Yes, subsidiary of <input type="checkbox"/> Yes, related entity of Name of the approved trustee(s): <input type="checkbox"/> No

Subsidiary or related entity of an overseas banking group, or other overseas financial institution group	<input type="checkbox"/> Yes, subsidiary of Name of the group(s): Assets consolidated into the group(s): HK\$ _____ <input type="checkbox"/> No
Subsidiary or related entity of a listed company or overseas listed company	<input type="checkbox"/> Yes, subsidiary of Name of the listed company(ies): <input type="checkbox"/> No
Subsidiary or related entity of a property developer	<input type="checkbox"/> Yes, subsidiary of Name of the property developer(s): <input type="checkbox"/> No

Section 2 : Financial Information

2.1 Abridged Statement of Financial Position as at (/ /)
(day / month / year)

(Please provide the most recent financial data below and specify the date of the relevant Statement of Financial Position)

Major items	HK\$ Million
Assets	
(1) Total customer loans (i.e. loans made to general public) ^(Note 6) = (i) + (ii) + (iii) + (iv)	
(a) maturing within 6 months (i)	
(b) maturing over 6 months and within 12 months (ii)	
(c) maturing over 12 months and within 60 months (iii)	
(d) maturing over 60 months (iv)	
(2) Total intra-conglomerate loans = (v) + (vi) + (vii) + (viii) <i>(i.e. loans made to the holding company, the holding company's other subsidiaries, the company's own subsidiaries)</i>	
(a) maturing within 6 months (v)	
(b) maturing over 6 months and within 12 months (vi)	
(c) maturing over 12 months and within 60 months (vii)	
(d) maturing over 60 months (viii)	
(3) Liquid assets ^(Note 7)	

Major items	HK\$ Million
(4) Credit assets other than customer loans, intra-conglomerate loans and liquid assets <small>(Note 8) = (ix) + (x) + (xi) + (xii)</small>	
(a) maturing within 6 months (ix)	
(b) maturing over 6 months and within 12 months (x)	
(c) maturing over 12 months and within 60 months (xi)	
(d) maturing over 60 months (xii)	
(5) Other assets = (xiii) + (xiv) Please specify: _____	
(a) maturing within 12 months (xiii)	
(b) maturing over 12 months (xiv)	
(6) Total assets <small>(Note 9)</small> = (1) + (2) + (3) + (4) + (5)	
of which	
(a) maturing within 12 months	
(b) are claims on <small>(Note 10)</small> licensed corporations under the SFO in Hong Kong	
(c) are claims on <small>(Note 10)</small> authorized institutions <small>(Note 3)</small> in Hong Kong	
(d) are claims on <small>(Note 10)</small> insurance companies <small>(Note 4)</small> in Hong Kong	
(e) are claims on <small>(Note 10)</small> pension funds <small>(Note 11)</small> in Hong Kong	
(f) are claims on <small>(Note 10)</small> other financial institutions / funds <small>(Note 12)</small> in Hong Kong	
(g) are claims on <small>(Note 10)</small> financial institutions outside Hong Kong	
(h) are claims on <small>(Note 10)</small> listed companies in Hong Kong	
(i) are claims on <small>(Note 10)</small> listed companies outside Hong Kong	

Major items		HK\$ Million
Liabilities		
(7) Total bank borrowings = (xv) + (xvi)		
comprising:	(a) borrowings from banks operating in Hong Kong, including borrowings from Hong Kong branches of overseas banks (xv)	
	(b) borrowings from banks not operating in Hong Kong (xvi)	
(8) Total debt instruments issued and outstanding		
(9) Total intra-conglomerate borrowings		
(10) Other liabilities Please specify: _____		
(11) Shareholders' fund		
(12) Total liabilities ^(Note 9) = (7) + (8) + (9) + (10) + (11)		
of which		
(a) maturing within 12 months		
(b) are liabilities to ^(Note 13) licensed corporation under SFO in Hong Kong		
(c) are liabilities to ^(Note 13) authorized institutions ^(Note 3) in Hong Kong		
(d) are liabilities to ^(Note 13) insurance companies ^(Note 4) in Hong Kong		
(e) are liabilities to ^(Note 13) pension funds ^(Note 11) in Hong Kong		
(f) are liabilities to ^(Note 13) other financial institutions / funds ^(Note 12) in Hong Kong		
(g) are liabilities to ^(Note 13) financial institutions outside Hong Kong		
(h) are liabilities to ^(Note 13) listed companies in Hong Kong		
(i) are liabilities to ^(Note 13) listed companies outside Hong Kong		
(13) Off-balance sheet items – Total ^(Note 14)		
of which		
Credit risk exposure type ^(Note 15)		

2.2 Breakdown of Total Customer Loans

Breakdown of Total Customer Loans (Item 1 in Section 2.1)		HK\$ Million
Personal loans (A) = (B) + (C)		
Unsecured personal loans (B)		
Secured personal loans (C) = (D) + (H) + (I) + (J)		
Major items		HK\$ Million
Personal loans secured by properties (D) = (E1) + (E2) AND = (F1) + (F2) AND = (G1) + (G2) + (G3)		
<u>Of the total property mortgage loans stated in (D) above</u>		
● Secured by residential properties (E1)		
● Secured by commercial / industrial properties (E2)		
<u>Of the total property mortgage loans stated in (D) above</u>		
● For financing the purchase of residential property(ies) concerned (F1)		
● For any other purposes (F2)		
<u>Of the total property mortgage loans stated in (D) above</u>		
● First mortgages (G1)		
● Second mortgages (G2)		
● Third or subsequent mortgages (G3)		
Personal loans secured by securities (H)		
Personal loans secured by vehicles / licences (e.g. taxi, minibus) (I)		
Other secured personal loans (J) Please specify: _____		
Corporate loans (K) = (L) + (M)		
Unsecured corporate loans (L)		
Secured corporate loans (M) = (N) + (R) + (S) + (T) + (U)		
Corporate loans secured by properties (N) = (O1) + (O2) AND = (P1) + (P2) AND = (Q1) + (Q2) + (Q3)		
<u>Of the total property mortgage loans stated in (N) above</u>		
● Secured by residential properties (O1)		
● Secured by commercial / industrial properties (O2)		
<u>Of the total property mortgage loans stated in (N) above</u>		
● For financing the purchase of residential property(ies) concerned (P1)		
● For any other purposes (P2)		

Major items	HK\$ Million	HK\$ Million
<u>Of the total property mortgage loans stated in (N) above</u>		
● First mortgages (Q1)		
● Second mortgages (Q2)		
● Third or subsequent mortgages (Q3)		
Corporate loans secured by securities (R)		
Corporate loans secured by vehicles / licences (e.g. taxi, minibus) (S)		
Corporate loans secured by machinery (T)		
Corporate loans secured by others (U) Please specify: _____		
Total customer loans = (A) + (K) ^(Note 6)		

2.3 Audited Financial Statement

Please attach a copy of the company's Audited Financial Statement in support of the information provided in Sections 2.1 and 2.2	
Period covered by the Audited Financial Statement	

2.4 Loans referred by Third Party(ies) ^(Note 16)

Total amount of customer loans = (1) of Section 2.1		
Loans referred by third party(ies)	Amount:	% of total customer loan
Loans not referred by third party(ies)	Amount:	% of total customer loan

Section 3 : Operational Information

3.1	Has the company been the subject of complaints to the Police regarding its money lender business since the granting of the last money lenders licence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.2	Has the company received any warning letters from the Police Licensing Office since the granting of the last money lenders licence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
3.3	Has the company complied with all the provisions of the Money Lenders Ordinance in carrying on the money lender business since the granting of the last money lenders licence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 4 : Anti-Money Laundering and Counter-Financing of Terrorism Requirements

<i>Risk-based Approach</i>			
4.1	(a) Has the company conducted an institutional money laundering and/or terrorist financing (“ML/TF”) risk assessment to identify, assess and understand its ML/TF risks in relation to: (i) its customers; (ii) the countries or jurisdictions its customers are from or in; (iii) the countries or jurisdictions the company has operations in; and (iv) the products, services, transactions and delivery channels of the company? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(b) Has the company conducted its institutional ML/TF risk assessment every 2 years and upon trigger events which are material to the company’s business and risk exposure? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.2	Has the company undertaken risk assessment to identify, assess and understand the ML/TF risks prior to the launch of new products, new business practices, or the use of new or developing technologies for both new and pre-existing products, and taken appropriate measures to manage and mitigate the risks identified?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	If not, please explain:		
4.3	Has the company conducted customer risk assessment to determine the extent of customer due diligence (“CDD”) and ongoing monitoring measures to be applied, and kept the relevant documents and records? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
AML/CFT Systems			
4.4	Has the company put in place adequate and proper policies, procedures and controls (“Systems”) to comply with the anti-money laundering and counter-financing of terrorism (“AML/CFT”) requirements, which include but not limited to compliance management arrangements, an independent audit function, employee screening procedures and ongoing employee training programme? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If yes, (a) Has the company kept any documents or records showing the putting in place of adequate and proper AML/CFT Systems? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.5	Is the company incorporated in Hong Kong? If not, please skip 4.5(a) and (b).	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	<p>If yes,</p> <p>(a) Does the company have any branches or subsidiary undertakings outside Hong Kong (“overseas branches and/or subsidiary undertakings”) that carry on the same business as an FI as defined in the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615) (“AMLO”) or as the company?</p> <p>If not, please skip 4.5(b).</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>If yes,</p> <p>(b) Has the company implemented group-wide AML/CFT Systems to apply the requirements set out in the Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (for Licensed Money Lenders) (“Guideline”) to all of its overseas branches and subsidiary undertakings in its financial group, wherever the requirements in the Guideline are relevant and applicable to the overseas branches and subsidiary undertakings concerned?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>4.6</p>	<p>Has the company appointed a compliance officer (“CO”) and a money laundering reporting officer (“MLRO”)?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>If yes,</p> <p>(a) Has the company kept any documents or records showing the appointment of the CO and the MLRO?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>(b) Has the company kept any documents or records showing the responsibilities of the CO and the MLRO?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	If not, please explain:		
4.7	<p>Has the company established an independent audit function which regularly reviews the:</p> <p>(a) adequacy of the company’s AML/CFT Systems, ML/TF risk assessment framework and application of risk-based approach;</p> <p>(b) effectiveness of suspicious transaction reporting systems;</p> <p>(c) effectiveness of the compliance function; and</p> <p>(d) level of awareness of staff having AML/CFT responsibilities?</p> <p>If yes, who performs the independent audit function and how often is the independent review conducted?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not, please explain:		
4.8	<p>Has the company put in place adequate and appropriate screening procedures in order to ensure high standards when hiring employees?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Customer Due Diligence</i>			
4.9	<p>Has the company carried out CDD measures in relation to each customer in the following circumstances:</p>		
	<p>(a) before establishing a business relationship with the customer;</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	(b) before carrying out for the customer an occasional transaction involving an amount equal to or above HK\$120,000 or an equivalent amount in any other currency, whether the transaction is carried out in a single operation or in several operations that appear to the company to be linked;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(c) when the company suspects that the customer or the customer's account is involved in ML/TF; and	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(d) when the company doubts the veracity or adequacy of any information previously obtained for the purpose of identifying the customer or for the purpose of verifying the customer's identity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not for any of the above items, please explain:		
4.10	In respect of each customer, has the company carried out the following CDD measures:		
	(a) identify the customer and verify the customer's identity using documents, data or information provided by a reliable and independent source;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(b) where there is a beneficial owner in relation to the customer, identify and take reasonable measures to verify the beneficial owner's identity so that the company is satisfied that it knows who the beneficial owner is, including, in the case of a legal person or trust, measures to enable the company to understand the ownership and control structure of the legal person or trust;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(c) obtain information on the purpose and intended nature of the business relationship (if any) established with the company unless the purpose and intended nature are obvious; and	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(d) if a person purports to act on behalf of the customer:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(i) identify the person and take reasonable measures to verify the person's identity using documents, data or information provided by a reliable and independent source; and		
	(ii) verify the person's authority to act on behalf of the customer?		
	If not for any of the above items, please explain:		
Enhanced Due Diligence and Additional Measures ^(Note 17)			
4.11	Has the company applied enhanced due diligence ("EDD") measures in relation		

	to a business relationship or transaction to mitigate and manage the high ML/TF risks in:		
	(a) a situation that by its nature may present a high ML/TF risk taking into account the potentially higher risk factors referred to in paragraph 4.9.5 of the Guideline;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(b) a situation specified by the Registrar of Money Lenders (“Registrar”) in a notice in writing given to the company?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not for any of the above items, please explain:		
4.12	Has the company established and maintained effective procedures for determining whether a customer or its beneficial owner is a non-Hong Kong politically exposed person (“PEP”) ^(Note 18) ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not, please explain:		
4.13	(a) Has the company, when it knows that a customer or a beneficial owner of a customer is a non-Hong Kong PEP, applied all the EDD measures set out in paragraph 4.9.10 of the Guideline in the following situations:		
	(i) before establishing a business relationship with a customer who is or whose beneficial owner is a non-Hong Kong PEP; and	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(ii) before continuing an existing business relationship where the customer or the beneficial owner is subsequently found to be a non-Hong Kong PEP?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not for any of the above items, please explain:		
	(b) Has the company conducted enhanced ongoing monitoring of a business relationship with a customer if the customer or the beneficial owner of the customer is a non-Hong Kong PEP as required in paragraph 4.9.11 of the Guideline?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	If not, please explain:		
4.14	<p>Has the company taken reasonable measures to determine whether a customer or a beneficial owner of a customer is a Hong Kong PEP or an international organisation PEP?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.15	<p>(a) Has the company applied all the EDD measures set out in paragraph 4.9.10 of the Guideline in the following situations:</p> <p>(i) before establishing a high risk business relationship with a customer who is or whose beneficial owner is a Hong Kong PEP or an international organisation PEP ^(Note 18);</p> <p>(ii) when continuing an existing business relationship with a customer who is or whose beneficial owner is a Hong Kong PEP or an international organisation PEP where the relationship subsequently becomes high risk; and</p> <p>(iii) when continuing an existing high risk business relationship where the company subsequently knows that the customer or the beneficial owner of the customer is a Hong Kong PEP or an international organisation PEP?</p> <p>If not for any of the above items, please explain:</p>		
	<p>(b) Has the company conducted enhanced ongoing monitoring of a business relationship with a customer if the customer or the beneficial owner of the customer is a Hong Kong PEP or an international organisation PEP as referred to in paragraph 4.9.18 of the Guideline?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

4.16	<p>Has the company obtained approval from its senior management to establish a business relationship that presents a high ML/TF risk, or continue an existing business relationship where the relationship subsequently presents a high ML/TF risk?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.17	<p>Has the company carried out additional measures to mitigate the risk associated with customers not physically present for identification purposes?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Reliance on CDD performed by Intermediaries</i>			
4.18	<p>Has the company relied upon any intermediary to perform any part of the CDD measures?</p> <p>If not, please skip 4.18(a), (b), (c) and (d).</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>(a) In respect of each intermediary, has the company obtained written confirmation from the intermediary that the intermediary agrees to act as the company's intermediary and perform which part of the CDD measures?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>(b) In respect of each intermediary, is the company satisfied that the intermediary will on request provide a copy of any document, or a record of any data or information, obtained by the intermediary in the course of carrying out CDD measures without delay?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If not, please explain:		
(c) Is any of the intermediaries a domestic intermediary? If not, please skip 4.18(c)(i) and (ii).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, (i) In respect of each domestic intermediary, is the intermediary an intermediary financial institution ^(Note 19) , an accounting professional ^(Note 20) , an estate agent ^(Note 21) , a legal professional ^(Note 22) or a trust or company service provider (“TCSP”) licensee ^(Note 23) ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(ii) In respect of each domestic intermediary being an accounting professional, an estate agent, a legal professional or a TCSP licensee, is the company satisfied that the domestic intermediary has adequate procedures in place to prevent ML/TF and is required to comply with the relevant requirements set out in Schedule 2 to the AMLO with respect to the customer? If not for any of the above items, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
(d) Is any of the intermediaries an overseas intermediary? If not, please skip 4.18(d)(i), (ii), (iii) and (iv).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, (i) In respect of each overseas intermediary, does the intermediary fall into one of the following categories of businesses or professions: <ul style="list-style-type: none"> • an institution that carries on a business similar to that carried on by an intermediary financial institution; • a lawyer or a notary public; • an auditor, or professional accountant, or a tax advisor; • a trust or company service provider; • a trust company carrying on trust business; and • a person who carries on a business similar to that carried on by an estate agent? 	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	(ii) In respect of each overseas intermediary, is the intermediary required under the law of the jurisdiction concerned to be registered or licensed or is regulated under the law of that jurisdiction?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(iii) In respect of each overseas intermediary, does the intermediary have measures in place to ensure compliance with requirements similar to those imposed under Schedule 2 to the AMLO?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(iv) In respect of each overseas intermediary, is the intermediary supervised for compliance with those requirements by an authority in that jurisdiction that performs functions similar to those of any of the relevant authorities or the regulatory bodies (as may be applicable) as defined in the AMLO?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not for any of the above items, please explain:		
Ongoing Monitoring			
4.19	Has the company conducted ongoing CDD by reviewing from time to time documents, data and information relating to the customers that have been obtained by the company for the purpose of complying with the requirements set out in Part 2 of Schedule 2 to the AMLO to ensure that they are up-to-date and relevant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not, please explain:		
4.20	Has the company conducted an annual review at a minimum, or more frequent reviews if deemed necessary, of all customers that present high ML/TF risks to ensure the CDD information retained remains up-to-date and relevant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not, please explain:		
4.21	Has the company conducted appropriate scrutiny of transactions carried out for each customer to ensure that they are consistent with the company's knowledge of the customer, the customers' business, risk profile and source of funds?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	If not, please explain:		

4.22	<p>Has the company taken measures to identify transactions that (i) are complex, unusually large in amount or of an unusual pattern; and (ii) have no apparent economic or lawful purpose, and examined the background and purposes of those transactions and set out the findings in writing?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Terrorist Financing, Financial Sanctions and Proliferation Financing</i>			
4.23	<p>Has the company implemented an effective screening mechanism to screen its customers and the beneficial owners of the customers against the current relevant list(s) of terrorist and sanction designations at the establishment of the relationship and against all new and any updated list(s) as soon as practicable?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>If yes,</p> <p>(a) Has the company, using a risk-based approach, extended such screening requirements to the connected parties (as defined in paragraph 4.3.19 of the Guideline) of the customers and the persons purporting to act on behalf of the customers?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<p>(b) Has the company kept the relevant screening records?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<i>Suspicious Transaction Reports</i>			
4.24	Has the company implemented appropriate AML/CFT Systems to fulfill its statutory reporting obligation to report suspicious transactions 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)? If not, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Record-keeping</i>			
4.25	Has the company kept the following documents and records of customers throughout the continuance of the business relationship with each customer and for a period of at least 5 years beginning on the date on which the business relationship ends:		
	(a) the original or a copy of the documents, and a record of the data and information, obtained in the course of identifying and, where applicable, verifying the identity of the customer and/or beneficial owner of the customer and/or beneficiary and/or persons who purport to act on behalf of the customer and/or other connected parties to the customer;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(b) other documents and records obtained throughout the CDD and ongoing monitoring progress (including simplified due diligence and EDD);	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(c) where applicable, the original or a copy of the documents, and a record of the data and information, on the purpose and intended nature of the business relationship;	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(d) the original or a copy of the records and documents relating to the customer's account and business correspondence with the customer and any beneficial owner of the customer; and	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	(e) the results of any analysis undertaken (e.g. inquiries to establish the background and purposes of transactions that are complex, unusually large in amount or of unusual pattern, and have no apparent economic or lawful purpose)? If not for any of the above items, please explain:	<input type="checkbox"/> Yes	<input type="checkbox"/> No

4.26	<p>Has the company kept the original or a copy of the documents, and a record of the data and information, obtained in connection with each transaction the company carries out for a period of at least 5 years beginning on the date on which the transaction is completed?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Staff Training			
4.27	<p>Has the company provided its staff with adequate training so that they are adequately trained to implement its AML/CFT Systems?</p> <p>If yes, how is the effectiveness of the training monitored?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
4.28	<p>Has the staff been made aware of:</p> <p>(a) the company's obligations and their own role in relation to the company's compliance with the CDD and record-keeping requirements under the Guideline;</p> <p>(b) the company's and their own personal statutory obligations relating to suspicious transactions reporting;</p> <p>(c) any other statutory and regulatory obligations that concern the company and themselves in relation to AML/CFT;</p> <p>(d) the company's policies and procedures relating to AML/CFT; and</p> <p>(e) any new and emerging techniques, methods and trends in ML/TF to the extent that such information is needed to carry out their particular roles in the company with respect to AML/CFT?</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

	If not, please explain:		
4.29	<p>Has the company maintained records for a minimum of 3 years of who have been trained, when the staff received the training and the type of the training provided?</p> <p>If not, please explain:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 5 : Risk Assessment

Customer Risk		
5.1	Total number of customers <i>(since the date of granting the last money lenders licence)</i>	_____
5.2	In relation to customers' residence	
	(a) Number of customers with residence in or connection with countries subject to sanctions, embargos or similar measures issued by, for example, the United Nations	_____
	(b) Number of customers with residence in or connection with countries/areas identified by credible sources ^(Note 24) as:	
	(i) providing funding or support for terrorist activities or that have designated terrorist organisations operating within them	_____
	(ii) having significant levels of corruption or other criminal activity	_____
	(iii) lacking appropriate AML/CFT laws, regulations and other measures including jurisdictions identified by the FATF as having strategic AML/CFT deficiencies	_____
	(c) Total number of customers involved in the risk factors under Section 5.2(a) and (b) <i>(note: a customer involved in more than one risk factors should be counted once only)</i>	_____
5.3	In relation to customers	
	(a) Number of customers who are sanctioned by the relevant national competent authority for non-compliance with the applicable AML/CFT regime	_____
	(b) Number of customers who is a PEP or whose family members or close associates are PEPs (including where a beneficial owner of the customer is a PEP)	_____
	(c) Number of customers whose primary source of income originates from high-risk jurisdictions	_____
	(d) Number of customers with complex or non-transparent ownership/control structure (for example, structure involving multiple layers, different jurisdictions, trusts, the use of bearer shares etc)	_____
	(e) Number of customers having been mentioned in negative news reports from credible media, particularly those related to predicate offences for money laundering and terrorist financing or to financial crimes	_____
	(f) Number of customers engaging in, or deriving wealth or revenues from, a high-risk cash-intensive business	_____
	(g) Number of customers who have funds that are obviously and inexplicably disproportionate to their circumstances (e.g. their age, income, occupation or wealth)	_____

	(h) Number of customers with substantial business operation outside Hong Kong	_____
	(i) Total number of customers involved in the risk factors under Section 5.3(a) to (h) <i>(note: a customer involved in more than one risk factors should be counted once only)</i>	_____
Product / Service Risk		
5.4	Total amount of loans (HK\$ Million) <i>(since the date of granting the last money lenders licence)</i>	_____
5.5	Total number of loans <i>(since the date of granting the last money lenders licence)</i>	_____
	of which	
	(a) Number of loans with the size within HK\$1 million	_____
	(b) Number of loans with the size over HK\$1 million and within HK\$5 million	_____
	(c) Number of loans with the size over HK\$5 million	_____
5.6	In relation to customer loans	
	(a) Number of loans either wholly or partially paid out to third parties	_____
	(b) Number of loans involving repayment (including principal, interest or any other fee) received from, or repayment instructions given by, associated, unknown or unexpected third parties	_____
	(c) Total number of loans involving the risk factors under Section 5.6(a) and (b) <i>(note: a loan involving more than one risk factors should be counted once only)</i>	_____
	(d) Number of loans involving repayment using physical cash	_____
	(e) Number of loans involving repayment by way of virtual assets and other anonymous means of payment	_____
5.7	Please list out the new technologies and new payment methods which are used in your money lending business: _____ _____ _____ _____	
Distribution Channel Risk		
5.8	(a) Number of loan transactions which adopt a non-face-to-face approach for establishing a business relationship with a customer (e.g. online, postal, telephone channels)	_____

	(b) (i) Number of loan transactions for which the company has verified the identity of the customers on the basis of data or information provided by a digital identification system that is a reliable and independent source that is recognized by the Registrar; and (ii) Name of the system _____	_____ <div style="background-color: #cccccc; height: 20px; width: 100%;"></div>
--	--	--

Section 6 : Disciplinary Actions

<p>Has</p> <ul style="list-style-type: none"> ● the company; ● any of the directors or other controlling persons of the company; ● another company of which the company is or was a corporate director; or ● another company of which the company is or was a principal shareholder <p>previously been</p> <ul style="list-style-type: none"> ● refused or restricted, in Hong Kong or elsewhere, from the right to carry on any trade, business or profession for which a specific licence, registration or other authorization is required by law? If so, please provide details _____ _____ _____ _____ _____ _____ ● censored, disciplined or disqualified by any professional or regulatory body in Hong Kong or elsewhere in relation to any trade, business or profession? If so, please provide details _____ _____ _____ _____ _____ _____ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No
	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section 7 : Declaration

I hereby declare that :

- (1) the company **does not have any business relationship with any relevant person or relevant entity** (as defined under the United Nations Sanctions Ordinance (Cap. 537) or any subsidiary legislation thereunder) which is subject to financial sanctions or any terrorist or terrorist associate as defined under the United Nations (Anti-Terrorism Measures) Ordinance (Cap. 575). ^(Note 25)
- (2) all the information provided in this form is complete, true and correct.

For and on behalf of	<i>(Name of the company)</i>		
Signature			
Name of person authorized by the company ^(Note 26)		Date	<i>(day / month / year)</i>

Note

1. Please use a separate sheet to continue if there is insufficient space provided for your answer.
2. Please provide information since the granting of the last money lenders licence.
3. Authorized institutions, as defined under the Banking Ordinance (Cap. 155), include banks, restricted licence banks and deposit-taking companies.
4. Insurance companies refer to companies specified under section 6(1) of the Insurance Ordinance (Cap. 41).
5. Approved trustee has the meaning given in section 2(1) of the Mandatory Provident Fund Schemes Ordinance (Cap. 485).
6. The amount of total customer loans appearing in item (1) of Section 2.1 should be the same as the amount which appears as the total in Section 2.2 [i.e. (A) + (K) in Section 2.2].
7. Liquid assets include cash and cash equivalents (i.e. assets which can be easily and immediately converted into cash at little or no loss of value).
8. Credit assets include investments in debt securities, government debt and other debt instruments.
9. The amount of total assets [see Item (6) of Section 2.1] should be the same as that of total liabilities [see Item (12) of Section 2.1].
10. Claims include balance sheet asset exposures that arise through credit provision (loans, bonds held, cash on deposits, trade credit/loans, reverse repos) but exclude investment in equity.
11. Pension funds refer to funds under the Mandatory Provident Fund Schemes and the Occupational Retirement Schemes.
12. Other financial institutions / funds may include Money Market Funds, Hedge Funds, Other Investment Funds, Real Estate Investment Trusts, Real Estate Funds, Trust Companies, Broker Dealers, Structured Finance Vehicles, and Central Counterparties etc.
13. Liabilities include balance sheet liability exposures that arise from borrowing activity (e.g. loans, deposits (where applicable), trade credit, repos) and equity investments.
14. The absolute sum of all long and short off-balance sheet positions.
15. Off-balance sheet credit risk exposures, e.g. due to contingent liabilities such as credit guarantees or lines of credit.
16. Third party(ies) refer(s) to any third party with whom the intending borrower has entered into an agreement for or in relation to the referral or the loan.
17. Please refer to Chapters 4 and 5 of the latest Guideline for the additional measures or enhanced due diligence measures in respect of the situations.
18. Please refer to Chapter 4 of the latest Guideline for the definition of different types of PEPs.
19. An intermediary financial institution means a financial institution as defined in the AMLO that is:
 - (a) an authorized institution;
 - (b) a licensed corporation;

- (c) an authorized insurer;
 - (d) a licensed individual insurance agent;
 - (e) a licensed insurance agency; or
 - (f) a licensed insurance broker company.
20. An accounting professional means:
- (a) a certified public accountant as defined by section 2(1) of the Professional Accountants Ordinance (Cap. 50), or a certified public accountant (practising) as defined by section 2(1) of the Accounting and Financial Reporting Council Ordinance (Cap. 588);
 - (b) a corporate practice as defined by section 2(1) of the Accounting and Financial Reporting Council Ordinance (Cap. 588); or
 - (c) a CPA firm as defined by section 2(1) of the Accounting and Financial Reporting Council Ordinance (Cap. 588).
21. An estate agent means:
- (a) a licensed estate agent as defined by section 2(1) of the Estate Agents Ordinance (Cap. 511); or
 - (b) a licensed salesperson as defined by section 2(1) of the Estate Agents Ordinance (Cap. 511).
22. A legal professional means:
- (a) a solicitor as defined by section 2(1) of the Legal Practitioners Ordinance (Cap. 159); or
 - (b) a foreign lawyer as defined by section 2(1) of the Legal Practitioners Ordinance (Cap. 159).
23. A TCSP licensee means:
- (a) a person who holds a licence granted under section 53G or renewed under section 53K of the AMLO; or
 - (b) a deemed licensee as defined by section 53ZQ(5) of the AMLO.
24. “Credible sources” refers to information that is produced by reputable and universally recognized international organisations and other bodies that make such information publicly and widely available. In addition to the FATF and FATF-style regional bodies, such sources may include, but are not limited to, supra-national or international bodies such as the International Monetary Fund, the World Bank and the Egmont Group of Financial Intelligence Units.
25. The relevant lists are available at “Compliance > Anti-Money Laundering and Counter-Financing of Terrorism” section of the website at www.cr.gov.hk. Except under the authority of a licence granted by the Chief Executive, it is an offence:
- (a) to make available, directly or indirectly, any funds, or other financial assets, or economic resources, to, or for the benefit of,
 - (i) designated person or entities;
 - (ii) persons or entities acting on behalf of or at the direction of the designated persons or entities mentioned in (i); or
 - (iii) entities owned or controlled by any persons or entities mentioned in (i) or (ii); or
 - (b) to deal with, directly or indirectly, any funds or other financial assets, or economic resources belonging to, or owned or controlled by, such persons or entities falling within (a) above.
26. Please produce evidence of authorization.