



Financial Intelligence and Investigation Bureau
Hong Kong Police Force

為持牌放債人舉辦的 打擊洗錢及恐怖分子資金籌集 網上講座

可疑交易報告

STREAMS 2簡介

洗黑錢風險評估、常見類型
及案例分享

聯合財富情報組
財富情報及調查科



www.jfiu.gov.hk



jfiu@police.gov.hk

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內容大綱

關於財富情報
及調查科和聯
合財富情報組

主要法例

可疑交易報告
機制

簡介全新系統
STREAMS 2

舉報可疑交易

洗黑錢形勢

常見類型及案
例分享



01. 財富情報及調查科 聯合財富情報組



1989

FID及JFIU架構重組



2021

聯合財富情報組的特色

1

由香港警務處及
香港海關人員組成
並在警務處設立辦公室

2

負責管理本港可疑交易
舉報機制的唯一機構

3

與世界各地的財富情
報單位及執法機關交
換財富情報

01. 財富情報及調查科 聯合財富情報組

聯合財富情報組的工作

從STREAMS
收集的可疑交
易數據



分析

情報開發

情報分發

趨勢及政策研究

國際協作

公私營機構合
作模式

Financial Institutions &
Designated Non-Financial
Businesses and Professions

Law Enforcement
Agencies

Overseas Financial
Intelligence Units

Policy Bureaux

Regulators

Professional Bodies

JFIU



02. 主要法例



Cap. 405

Drug Trafficking (Recovery of Proceeds) Ordinance
販毒(追討得益)條例

Cap. 455

Organized and Serious Crimes Ordinance
有組織及嚴重罪行條例

Cap. 575

United Nations (Anti-Terrorism Measures) Ordinance
聯合國(反恐怖主義措施)條例

Cap. 575

AML & CFT Ordinance and Amendment
打擊洗錢及恐怖分子資金籌集
(金融機構)條例及其修訂



02. 主要法例

打擊洗錢 (AML)

(s.25 of Cap. 405 - DTROP and s.25 of Cap. 455 - OSCO)

Any person

- **Knowing or having reasonable grounds to believe**
- **Any property**
- **In whole or in part directly or indirectly represents proceeds of drug trafficking / indicatable offence**
- **Deals with that property**

任何人

- 知道或有合理理由相信，
- 任何財產
- 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益
- 而仍處理該財產
- 即屬犯罪

MAXIMUM PENALTY

**FINE OF HKD 5 MILLIONS &
14 YEARS' IMPRISONMENT**



02. 主要法例

打擊恐怖分子資金籌集 (CFT)

(s.7 of Cap. 575 - UNATMO)

Any person

- **Provide** or **collect** by any means directly or indirectly
- Any property
- **(1)** With the intention that the property be used or **(2)** knowing that the property will be used
- In whole or in part to commit one or more terrorist acts

任何人

- 不得在下述情況以任何方法直接或間接提供或籌集財產：
- (1) 懷有將該財產的全部或部分用於作出一項或多於一項恐怖主義行為的意圖(不論該財產實際上有否被如此使用)；或
- (2) 知道該財產的全部或部分將會用於作出一項/多於一項恐怖主義行為(不論該財產實際上有否被如此使用)

MAXIMUM PENALTY

FINE & **14 YEARS'** IMPRISONMENT



02. 主要法例

可疑交易舉報法律責任

(s.25A(1) of Cap. 405 - DTROP; s.25A(1) of Cap. 455 - OSCO; and s12(1) of Cap. 575 - UNATMO)

Any person

- **Knows or suspects any property**
- **(1) represents / was used / is intended to be used in connection with the proceeds of drug trafficking / indictable offences or**
- **(2) is terrorist property**
- **Should disclose that knowledge or suspicion to an authorized officer (i.e. JFIU)**

任何人

- 知道或懷疑任何財產
- (1) 全部或部分、直接或間接代表任何人的販毒/從可公訴罪行得益曾在與販毒/可公訴罪行有關的情況下使用；或擬在與販毒/可公訴罪行有關的情況下使用；或
- (2) 是恐怖分子財產；
- 該人須在合理範圍內盡快把該知悉或懷疑，連同上述知悉或懷疑所根據的任何事宜，向獲授權人披露 (i.e. JFIU)

MAXIMUM PENALTY

**FINE OF HKD 50,000 &
3 MONTHS' IMPRISONMENT**



02. 主要法例

通風報訊

(s.25A(5) of Cap. 405 - DTROP; s.25A(5) of Cap. 455 - OSCO; and s12(5) of Cap. 575 - UNATMO)

Where a person

- **Knows or suspects** a disclosure has been made
- The person shall **not disclose** to another person any matter
- Which is likely to prejudice any investigation which might be conducted following that first-mentioned disclosure

任何人如知道或懷疑已有任何披露根據第(1)或(4)款作出，而仍向其他人披露任何相當可能損害或者會為跟進首述披露而進行的調查的事宜，

即屬犯罪。

MAXIMUM PENALTY

FINE OF HKD **500,000** &
3 YEARS' IMPRISONMENT



03.可疑交易報告機制

公私營機構合作模式

財富情報
單位

舉報機構

執法機關

舉報機構

- e.g. 金融機構
- 客戶盡職審查(CDD)
 - 認識你的客戶(KYC)
 - 備存記錄及內部監控
 - 提交可疑交易報告

實用資訊

財富情報單位

- 可疑交易報告機制
- 情報交換
- 國際合作
- 培訓與外展

情報

執法機關

- e.g. 警方、海關、廉政公署等
- 財富調查
 - 資產追查
 - 限制及沒收
 - 相互法律協助

證據



03.可疑交易報告機制

提交可疑交易報告的原因?

1



香港所有公民的
法律義務

2



無報告門檻

3



報告來源及報告
詳情將予保密

4



對民事及刑事責
任的法律保護



公司註冊處的指引

<https://www.cr.gov.hk/en/Guidelines.htm>



公 司 註 冊 處
COMPANIES REGISTRY

Guideline on Anti-Money Laundering and
Counter-Financing of Terrorism

(For Licensed Money Lenders)

March 2025



公 司 註 冊 處
COMPANIES REGISTRY

打擊洗錢
及
恐怖分子資金籌集指引

(持牌放債人適用)

2025 年 3 月

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公司註冊處的指引

洗錢報告主任

7.9

持牌人應委任一名洗錢報告主任作為舉報可疑交易的中央聯絡點，以及與聯合財富情報組及執法機構的主要聯絡點。洗錢報告主任應在識別及舉報可疑交易方面發揮積極作用，其主要職能應包括監督下列各項：

- (a) 覆核內部披露及例外情況報告，並參考所有可得到的相關資料，決定是否需要向聯合財富情報組舉

7.12

持牌人應設立及維持清晰的政策及程序，以確保：

- (a) 全體職員均知悉洗錢報告主任的身分及作出內部報告時應依循的程序；及
- (b) 所有內部報告應送達洗錢報告主任，不得無故延誤。

向聯合財富情報組報告

7.19

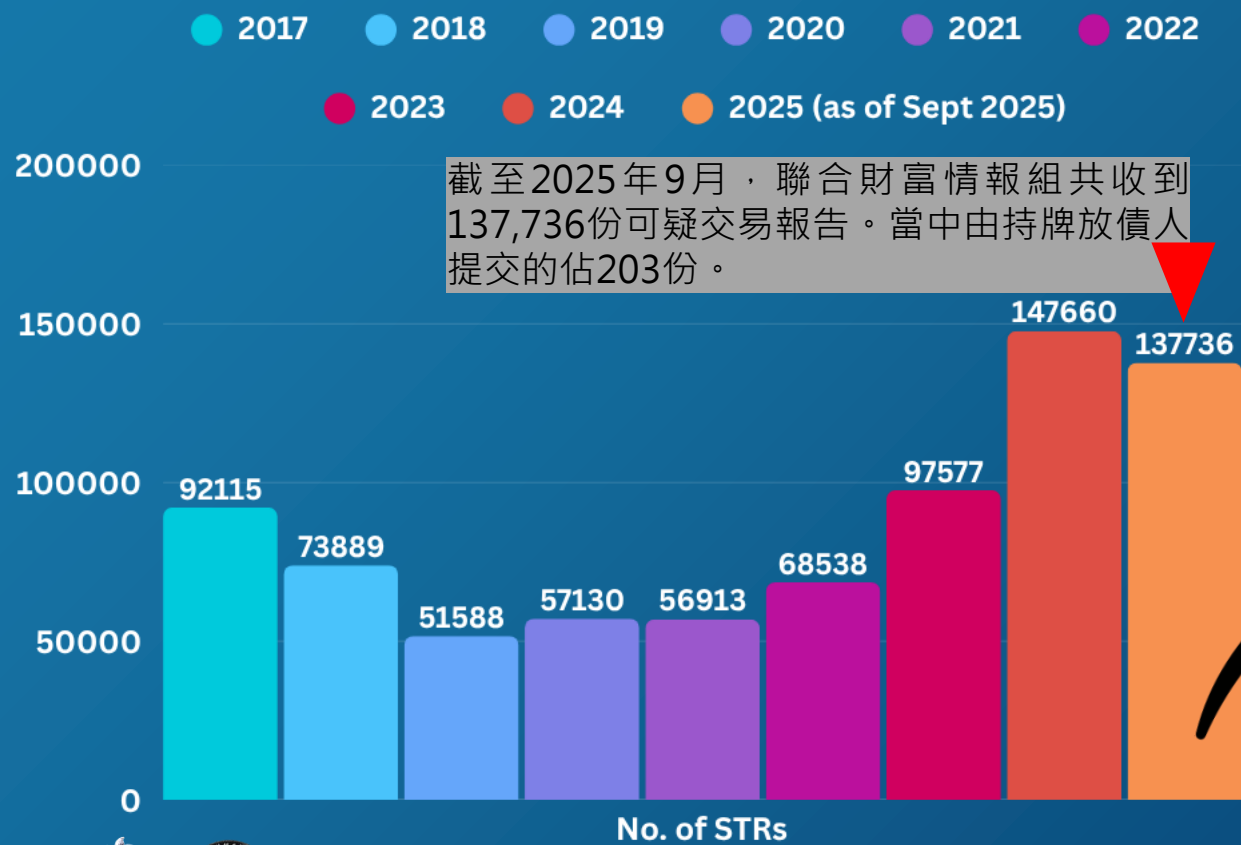
洗錢報告主任完成覆核內部報告後，如決定有知悉或懷疑的理由，則應在完成評估後，在合理範圍內盡快向聯合財富情報組披露有關資料，以及該項知悉或懷疑所依據的資料。視乎在何時知悉或產生懷疑而定，持牌人可在可疑交易或活動發生前提交可疑交易報告(而不論有關交易最終有否進行)，或在某項交易或活動完成後提交可疑交易報告。



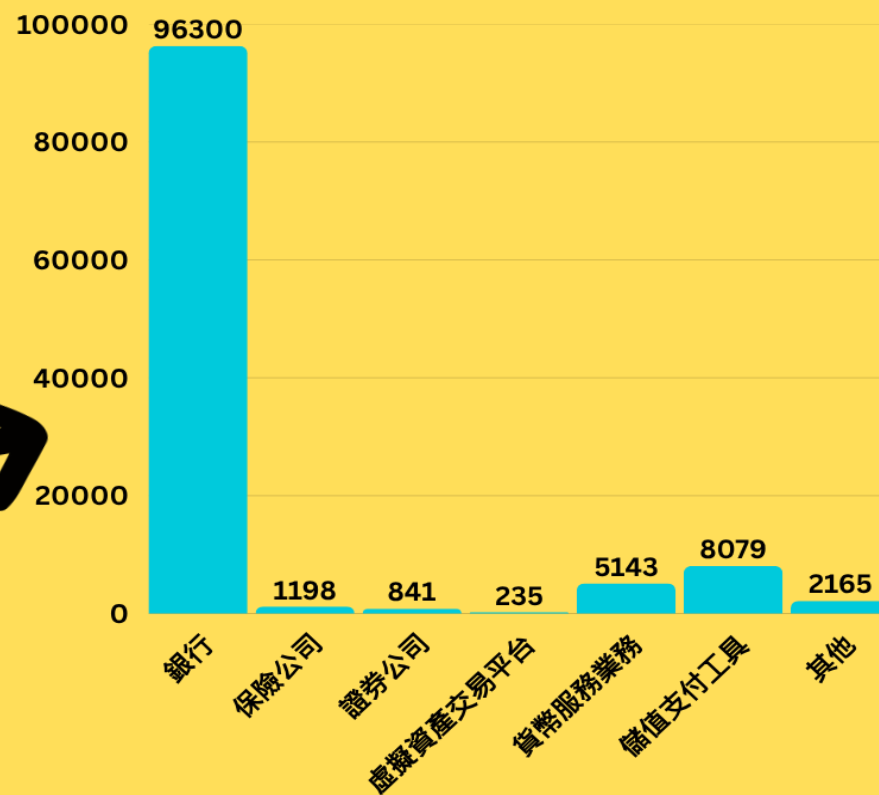


統計數字及趨勢

- 從2017年至2025年9月



截至2025年9月各行業提交的可疑交易報告



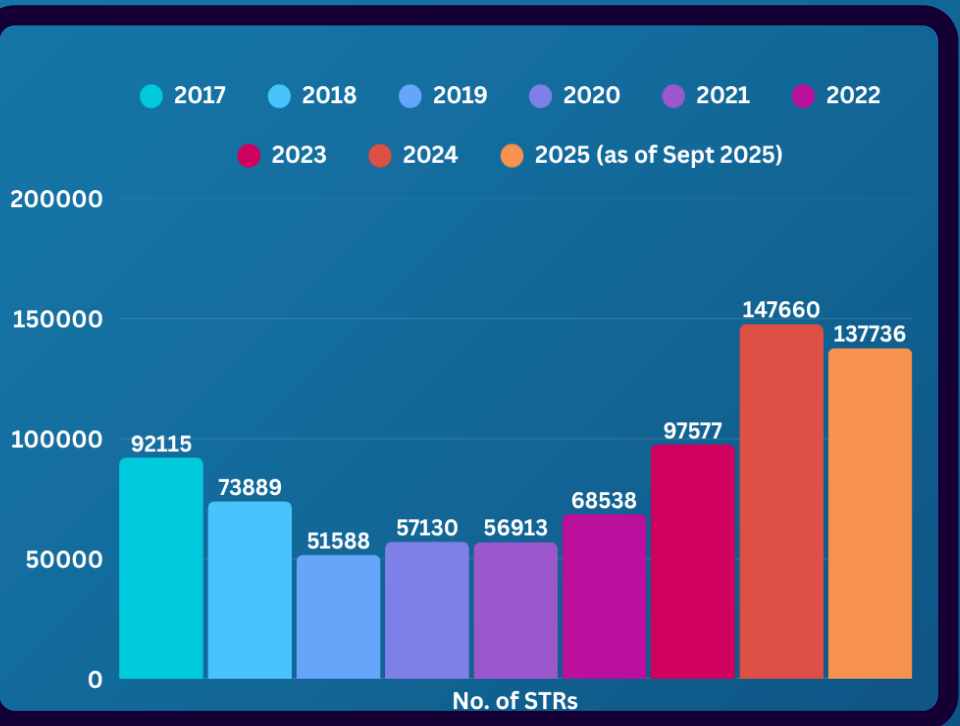


統計數字及趨勢

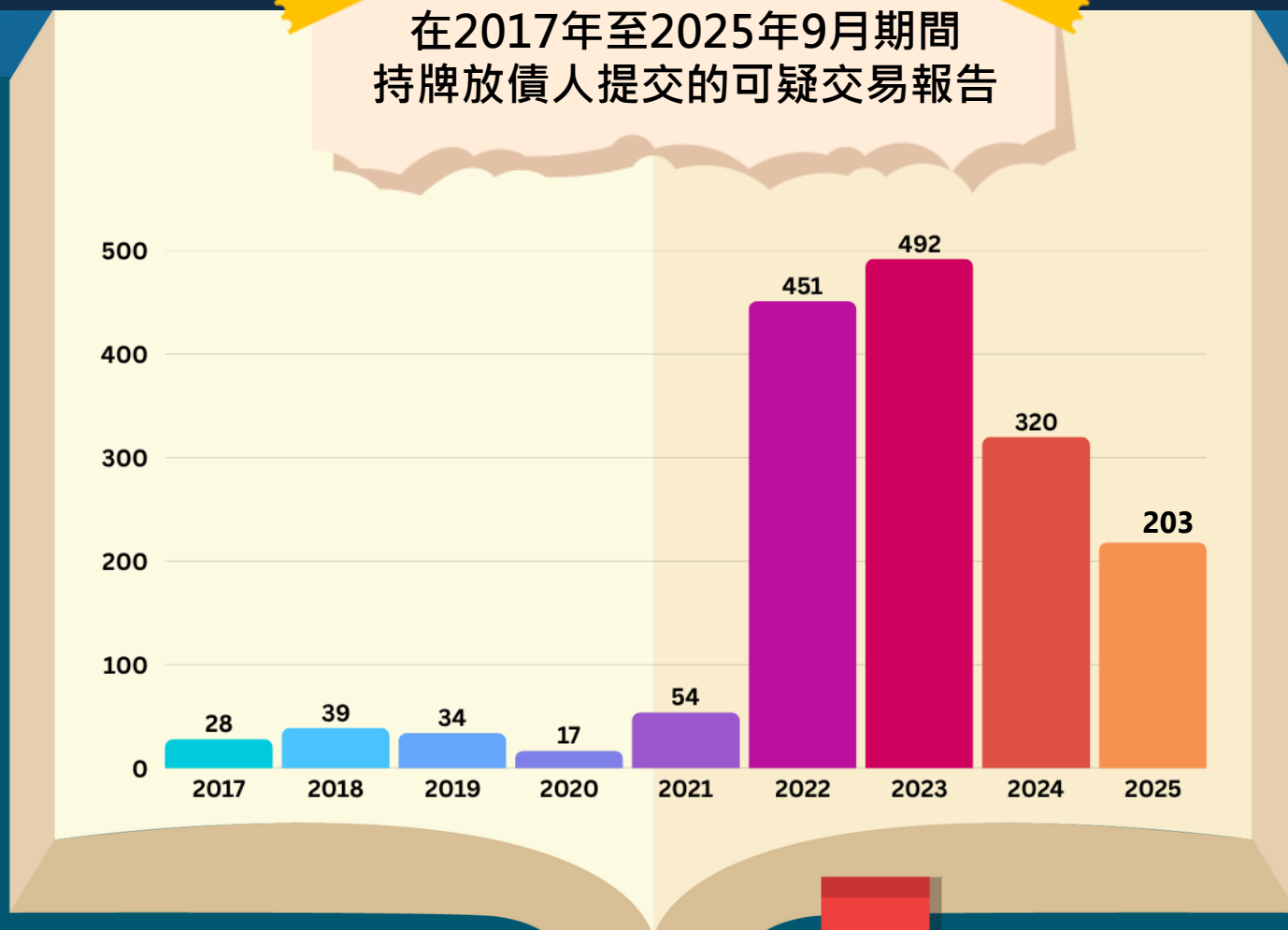
- 從2017年至2025年9月



在2017年至2025年9月期間，持牌放債人提交的可疑交易報告數量在2022年升幅明顯，之後平均每年提交421份STR (佔比0.13%)



在2017年至2025年9月期間
持牌放債人提交的可疑交易報告



現有提交報告方式

- 電郵或經可疑交易報告管理系統(STREAMS)

怎樣向聯合財富情報組舉報？

請以下列其中一種方式，遞交可疑交易報告：



- 網上舉報 – 可疑交易報告管理系統網上舉報表格
- 電郵 – 電郵地址 jfiu@police.gov.hk



- 傳真 – 傳真號碼：(852) 2529 4013



- 郵遞 – 請寄往香港郵政總局信箱6555號聯合財富情報組收



- 電話 – (852) 2866 3366 (只限於辦公時間內提供緊急報告之用)

如要經可疑交易報告管理系統舉報，請致電 (852) 2529 4013 或 電郵 – 電郵地址 jfiu@police.gov.hk 聯絡有關人員。



Suspected Crimes Suspicious Indicators Open Source Info. Entity Lists Check Save Print

REPORT MADE UNDER SECTION 25A OF THE DRUG TRAFFICKING (RECOVERY OF PROCEEDS) ORDINANCE OR ORGANIZED AND SERIOUS CRIMES ORDINANCE/ SECTION 12 OF THE UNITED NATIONS (ANTI-TERRORISM MEASURES) ORDINANCE TO THE JOINT FINANCIAL INTELLIGENCE UNIT ("JFIU")

STR Summary

STR Number:	
Submission Number:	
Date of Submission:	
Acknowledgement Issue Date:	
Consent Letter Issue Date:	
Consent:	☒ None ☐ Yes ☐ No ☐ Not Applicable
Consent Remark:	

Special Cases with Time Critical Nature:

* Report Related to Existing Investigation: ☐ Yes ☒ No

Attachment:

+ Refresh

No.	File Name	File Size
		KB
Total		KB



04. 簡介全新系統 **STREAMS 2**



增強STREAMS 2數據收集



收集更全面的資訊



促進大數據分析以有效識別網絡/趨勢



社交媒體

獲取相關的社
交媒體識別碼
和活動



數碼足跡

收集IP、SSID
、BSSID、地
理數據等



地址格式

將地址輸
入標準化



虛擬貨幣交易

加密交易專用
欄位





電子舉報可疑交易報告的好處

免費及安全的
STREAMS系統

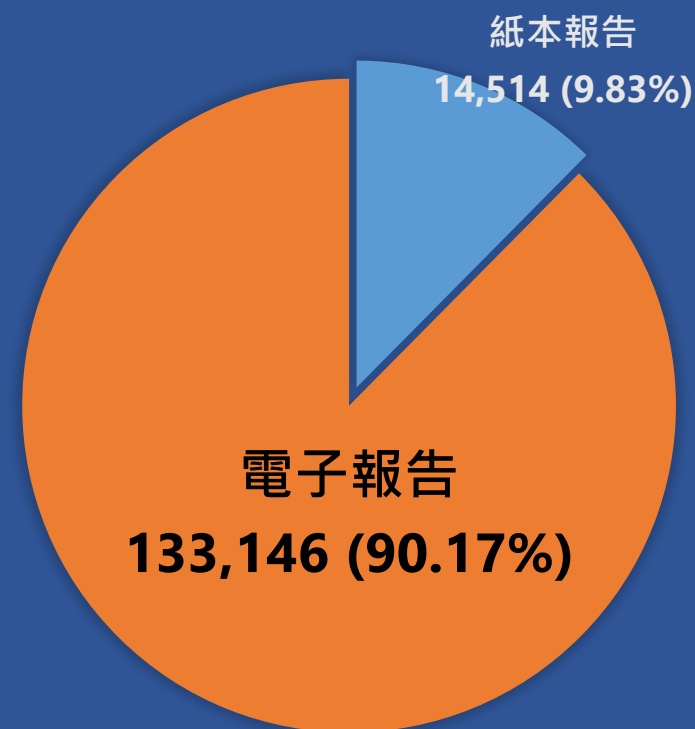
即時回饋 -
接到報告的收條

無需紙本報告

透過**STREAMS**接收同意/
不同意處理的決定

2024年可疑交易報告的數量:

147,660





可疑交易報告提交方式 **STREAMS 2**



所有受監管的機構將
需以**電子方式**
提交可疑交易報告!

PDF
表格

PDF用於離線填寫
和安全上傳

網上
表格

線上表格內建
驗證功能

XML

跨系統直接報告





可疑交易報告提交方式 **STREAMS 2**

更全面的數據欄位

必填欄位

- 所有行業都必需按指定格式填寫
- 例如電話號碼 (香港電話號碼需填8位數字) / 需填寫公司商業登記證號碼

選填欄位 (特定行業)

- 針對特定行業需求和交易類型定制的欄位





可疑交易報告提交方式 **STREAMS 2**

例子:

更全面的數據欄位

Account Create

Crypto-transaction-related ☐ Yes ☒ No OTC-Related ☐ Yes ☒ No Cancel

Name of Institution If Others Account No. (no bank code required) *

Type * Loan Account If Others Customer ID

Opening Date yyyy-mm-dd Closing Date yyyy-mm-dd

選填欄位 (特定行業)

- 針對特定行業需求和交易類型定制的欄位



05. 經STREAMS 2 舉報可疑交易



如何識別可疑交易？

SAFE 方法

審查涉事者
的背景及交易

SCREEN

- Screen the account for suspicious indicators
- Adverse news, sensitive connections, method of payment etc



ASK 詢問適當問題 釐清情況

- Check and enquiry
- Clarify any suspicion, such as financial background, source of fund, purpose of transactions etc



翻查相關記錄
仔細覆核

FIND

- Find and review clients' previous records
- Analysis on clients' backgrounds



EVALUATE 評估有否理據 作出可疑報告

- Evaluate the available information to determine if the transaction is suspicious
- If affirmative, file STRs



05. 經STREAMS 2 舉報可疑交易

-可疑交易指標

客戶

- 政治人物 (PEP)
- 來自高風險地區的人士及公司
- 與香港無明顯關係
- 申請時懷疑使用虛假文件
- 遙距申請

交易

- 收取款項來自第三方/本票/匯票/繳費靈
- 視乎客戶背景，與其資金流轉量/頻密程度不相稱
- 突然以大量資金提早還款
- 來自執法機構的查詢



05. 經STREAMS 2 舉報可疑交易

可疑交易指標

進一步查詢

- 合理地查閱公開資料(例如:互聯網), 客戶是否曾涉嫌參與洗黑錢、恐怖主義活動等, 例如恐怖分子資金籌集
- 客戶迴避問題或答案未能釋除疑點
- 未能提供相關證明文件

評估

- 客戶資料是否與你手上的資料相稱
- 未能澄清客戶提供的資訊





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Organisation Name
Org Name

Reporting Officer Name
Testing Company

Your Reference

Phone

Fax

Email *
test@gmail.com

Industry Category *
Financial - Licensed Money Lender

Disclosure-related Laws

☒ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☐ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes

☒ No





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Reporting Party

Subject

Organisation

Account

Transaction

Organisation Name
Org Name

Reporting Officer Name
Testing Company

Your Reference

Industry Category *

Financial - Licensed Money Lender

Disclosure-related Laws

☒ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]

☐ Organized and Serious Crimes Ordinance [Cap.455]

☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]

☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure

☐ Yes ☒ No

Industry Category *

DNFBP - Accounting Firm

DNFBP - Casino

DNFBP - Dealer in Precious Metals / Stones

DNFBP - Lawyer

DNFBP - Real Estate Agent

DNFBP - Trust & Company Services Provider

Financial - Bank

Financial - Financial Company

Financial - Insurance Company

Financial - Investment Company

Financial - Licensed Money Lender

Financial - MSO / RAMC

Financial - Securities Company

Financial - Stored Value Facility Licensee

Financial - Virtual Asset Trading Platform

JFIU - e-STR Secure Area User

Email *

test@gmail.com



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05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

<

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Organisation Name
Org Name

Reporting Officer Name
Testing Company

Your Reference

Phone

Fax

Email *
test@gmail.com

Industry Category *
Financial - Licensed Money Lender

Disclosure-related Laws

- ☒ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- ☐ Organized and Serious Crimes Ordinance [Cap.455]
- ☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- ☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure ☐ Yes ☒ No





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

有關罪案或收到執法機構查詢

可疑交易模式觸發內部監察系統

Disclosure-related Laws

- ☒ Drug Trafficking (Recovery of Proceeds) Ordinance [Cap.405]
- ☐ Organized and Serious Crimes Ordinance [Cap.455]
- ☐ United Nations (Anti-Terrorism Measures) Ordinance [Cap.575]
- ☐ Hong Kong National Security Law

Other Information:

Report related to previous / other disclosure ☐ Yes ☒ No

Other Information:

Report related to previous / other disclosure ☒ Yes ☐ No

Your Previous Reference		+	-
Previous STR No.	[E.g. STR 20250001]	+	-
ADCC Ref. No.	[E.g. ESPS 24/2025]	+	-
Police Report No.	[E.g. MK RN 25000001]	+	-
Investigation Unit	[E.g. DIT 1 MKDIST]	+	-
Search Warrant (Writ No.)		+	-
FINEST ISR No.		+	-

Other LEA Reference No.		+	-
☐ C&ED			
☐ ImmD			
☐ Others			

IRD Reference No. + -

SFC Reference No. + -





05. 舉報可疑交易 (STREAMS 2)

- 報告填寫方式

Person Create

Family Name * Given Name *

Chinese Name CCC

Gender * Occupation

☐ M ☐ F ☐ U

Role *

Nationality (Country / Region)

Identification Information [Add](#)

Other ID Type If Others

Phone [Add](#) [Link Existing Phone](#)

Country Code Area Code

Email [Add](#) [Link Existing Email](#)

Email

Address [Add](#) [Link Existing Address](#)

Address Preview

Social Media [Add](#) [Link Existing Social Media](#)

Platform	Account ID	Account Display Name	Group Name	Profile URL	Registered Social Media
----------	------------	----------------------	------------	-------------	-------------------------

社交媒體資料
新欄位!

< **Reporting Party** **Subject** Organisation Account Transaction Suspected Crimes Suspicious Indicator

- 年齡, 職業, 收入, 過往交易紀錄, 財富來源等
- 報告對象的角色: 疑犯, 受害人, 交易對手等

Role *

Associate

Participant

Suspect

Transaction Counterpart

Victim





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Reporting Party Subject **Organisation** Account Transaction Suspected

Organisation Create

Organisation Name (English) * Organisation Name (Chinese) *

Role * Business Nature *

Registration:

☐ Local Company Registration No. _____

Local Company with Business Registration Certificate _____

Local Company with Certificate of Incorporation _____

Local Public Listed Company _____

☐ Mainland / Overseas Company

Registration Country / Region _____

Reference Information:

☐ Non-government Organisation

☐ Charitable Organisation

Phone Add Link Existing Phone

Country Code Area Code Phone Number

No Data

Email Add Link Existing Email

Email

Business Nature *

Accommodation and Food Service Activities

Administrative and Support Service Activities

Agriculture, Forestry and Fishing

Arts, Entertainment and Recreation

Construction

DNFBP Activities - Accountancy

DNFBP Activities - Dealer in Precious Metals / Stones

DNFBP Activities - Estate Agency Firm

DNFBP Activities - Gaming

DNFBP Activities - Law Firm

DNFBP Activities - Trust & Company Services Provider

- 成立日期，公司詳細資料，業務性質等
- 與公司有關聯的人士，例如股東、董事等



05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Reporting Party Subject Organisation **Account** Transaction Suspected C

+ Add

Account Create

Crypto-transaction-related
☐ Yes ☒ No

OTC-Related
☐ Yes ☒ No

Name of Institution

Type *
Policy Account

Opening Date
yyyy-mm-dd

Closing Date
yyyy-mm-dd

List of Product

Effective on / Date of Issue
yyyy-mm-dd

Life Insured / Insured

Role

Total Premium Contributed

All-in-One Account - Savings
All-in-One Account - Current
All-in-One Account - Fixed Deposit
Betting Account
Credit Card Account
Currency Account
Currency Options Account
Current Account
Fixed Deposit Account
FX Short Selling Account
Investment Fund Account
Loan Account
Margin Account
Mortgage Account
Multi-Currency Savings Account
Policy Account

Cancel

✓





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Navigation tabs: Reporting Party, Subject, Organisation, **Account**, Transaction, Suspected Crimes, Suspicious Indicator

+ Add

Account Create

Crypto-Insured
☐ Yes

Name of Institution

Type *

Opening Date
yyyy-mm-dd

Account Balance Add

Currency

Account Balance Create

Currency * Balance *
+ / -

Date of The Account Balance
yyyy-mm-dd

Equivalent Value in HKD *
+ / - \$

Surrender Value (in HKD)
\$

Date of Surrender Value
yyyy-mm-dd

Cancel Confirm

如結餘為負數，
可選“-”



05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Navigation tabs: Reporting Party, Subject, Organisation, **Account**, Transaction, Suspected Crimes, Suspicious Indicator

+ Add

Digital Footprint: **New** | Link Existing Digital Footprint

數碼足跡

Digital Footprint Create

Event Type	Device Name	Device Model	Device OS
Device ID	IP Address	Period From yyyy-mm-dd	Period To yyyy-mm-dd
SSID	BSSID	Geohash	Latitude
Longitude			



05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Reporting Party Subject Organisation Account **Transaction** Suspected Crimes

☐ The transaction is related to Virtual Assets

Transaction Information **Add**

No.	Start Date	Start Time

Transaction Information Create

Start Date * yyyy-mm-dd Start Time hh:mm:ss End Date yyyy-mm-dd

End Time hh:mm:ss Account * Type *

Currency * Amount * + / - Equivalent Value in HKD * + / - \$

Name of Counterpart Bank Counterpart A/C No. (no bank code required) Name of Counterpart

Remarks (if any)

是否有第三方代為繳付?

有否發現可疑交易?



05. 舉報可疑交易 (STREAMS 2)

- 報告填寫方式

<

Reporting Party

Subject

Organisation

Account

Transaction

Suspected Crimes

Suspicious Indicator

Suspected Crimes Please put a "✓" in the appropriate box(es)

National Security

☐ Offence(s) Endangering National Security

Fraud

☐ Email Scam

☐ Investment Scam

☐ Romance Scam

☐ Telephone Deception

☐ Others (Please Specify) _____

Other Crimes

☐ Bookmaking

☐ Crime under Gambling Ordinance

☐ Corruption and Bribery

☐ Counterfeiting Currency

Illicit Trade Activities

☐ Counterfeiting and Piracy of Products

☐ Dealing in Precious Metals and Stones without a license

☐ Endangered Species Smuggling

☐ Illicit Cigarettes

☐ Smuggling (including those related to customs and excise duties and taxes)

☐ Trade Based Money Laundering

☐ Unlicensed Money Service Operator (UMSO)

☐ Kidnapping, Illegal Restraint and Hostage-Taking

☐ Money Laundering

☐ Murder, Grievous Bodily Injury

☐ Participation in an Organized Criminal Group and Racketeering





05. 舉報可疑交易 (STREAMS 2)

- 報告填寫方式

< Reporting Party Subject Organisation Account Transaction Suspected Crime **Suspicious Indicator**

Please put a * ✓ * in the selected box(es).

Fund Movement Pattern

- ☐ Indirect Transaction / Transaction Intended to Break Audit Trail
- ☐ Large Cash Transaction
- ☐ Numerous Transaction Counterparties without Apparent Reasonable Cause
- ☐ Temporary Repository of Fund
- ☐ Transactions Involving High-Risk Jurisdiction / Region
- ☐ Uneconomical Transaction / Transaction with No Business Purpose
- ☐ N/A

Customer Background / Behaviour

- ☐ Civil Servant-related **NEW**
- ☐ Common IP Address
- ☐ Customer Evasive / Reluctant to Provide Information
- ☐ Customer Insisted to Use Less Secured Transaction Methods
- ☐ Politically Exposed Persons (PEP)
- ☐ Sanctions-related
- ☐ Shared Device **NEW**
- ☐ Suspected Counterfeit Document Presented by the Customers
- ☐ Suspected Money Courier / Unlicensed Money Service Operator

Accounts

- ☐ Account Operated / Controlled by Third-Party Other Than Signatory / Account Holder
- ☐ Non Resident Personal Account
- ☐ Offshore Account (e.g. BVI Bank Account)
- ☐ Shell Company Account
- ☐ N/A

National Security Related

- ☐ A person is suspected of committing an offence endangering national security
- ☐ Transactions with specified absconders under Safeguarding National Security Ordinance
- ☐ Transactions with prohibited organisations under Safeguarding National Security Ordinance
- ☐ Transactions with high NS risk counterparties
- ☐ Others (Please Specify) _____
- ☐ N/A

Other Suspicious Indicator

- ☐ Casino-related Suspicious Transaction
- ☐ Charitable Organisation / NPO-related Suspicious Transaction
- ☐ Others (Please Specify) _____
- ☐ N/A





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes Suspicious Indicator

- 有關罪案 (詐騙, 貪污, 國際制裁, 恐怖主義行為等)
- 可疑交易模式 (大額現金, 資金短暫停留等)
- 收到執法機構查詢
- 公開資料 (新聞消息, 監管機構名單、制裁名單等)
- 收到搜查令 / 其他法庭命令
- 騙案預警 (客戶可能是受害人)



05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes Suspicious Indicator

- 國籍
- 身份證明文件類型 - 香港身份證, 內地護照等.
- 個人職業 / 公司業務性質, 資產來源, 收入來源等
- 家庭/業務背景, 如有 - 例如擔保人或其他關係合作伙伴同樣有可疑活動
- 與客戶開始業務關係的日期





05. 舉報可疑交易 (STREAMS 2) - 報告填寫方式

Narrative Comment about the Suspicious Transactions

1. Triggering Factors

- ☐ Commission / Types / Association of Offence
- ☐ Evidence of Suspicious Transaction Patterns
- ☐ Intelligence Received from LEAs
- ☐ Material from Publicly Available Information (e.g. adverse news, SFC alerts)
- ☐ Receipt of Search Warrant / Court Order
- ☐ Upstream Scam Intervention

2. Background of Person / Organisation

3. Details of Investigation / Transaction Analysis

4. Conclusions / Action Taken / Way Forward

< Reporting Party Subject Organisation Account Transaction Suspected Crimes Suspicious Indicator

- 審閱期
- 可疑交易詳情及分析
- 交易對手 - 是否有第三方代為繳付
- 查詢及公開資料 - 涉及制裁或負面資訊及公開資料的連結
- 分析數碼足跡, 如有 - 網際網路協定位址, 設備 ID 等
- 總結及跟進 - 進一步審查
- 終止客戶關係



05. 舉報可疑交易 (STREAMS 2) -附件



交易紀錄
(Excel 檔案)



申請文件



從客戶查詢獲得
的資料



數碼足跡, 如有

< Reporting Party Subject Organisation Account Transaction Suspected Crimes **Suspicious Indicator**

Attachment

Account Opening Mandate / Document(s)

No.	Person / Account Holder *

Detailed Transaction Record(s)

No.	Person / Account Holder *

Other Bank / Institution Document(s)

No.	Person / Account Holder *

Other Document(s)

No.



對可疑交易報告質素的觀察



常見謬誤

報告包含多個不相關的客戶 / 未有在敘述部分指出其共通點

敘述部分僅提及「參見附件」

僅因同一所屬集團的公司曾報告該客戶，而提交可疑交易報告



正確做法

若各客戶之間無關聯，則分別為每個客戶提交報告；
若觀察到客戶之間有關聯，則在敘述部分指出共通點

交易紀錄或其他相關文件可以附件形式提供，而其它
分析內容應在敘述部分填寫

相關公司的合規部門應嚴格審查同一客戶的戶口是否被
用於處理非法資金或與恐怖融資相關。



可疑交易報告意見回饋

接到報告的收條

同意/ 不同意處理
書/不適用

可疑交易報告季
度分析報告

與持份者的交流

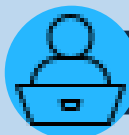


STREAMS 2 進程



使用者驗收測試最後階段：

- 提交可疑交易報告
- 查看已提交的可疑交易報告回饋
- 收取發給金融機構或非金融機構的「通知函」或不同意通知書



向各行業舉辦簡介講座

- 2025年10月/11月



查詢熱線 (通用問題)

- 高級督察 Owen TSE
- 電話: 3660 0533 / 電郵: owencytse@police.gov.hk



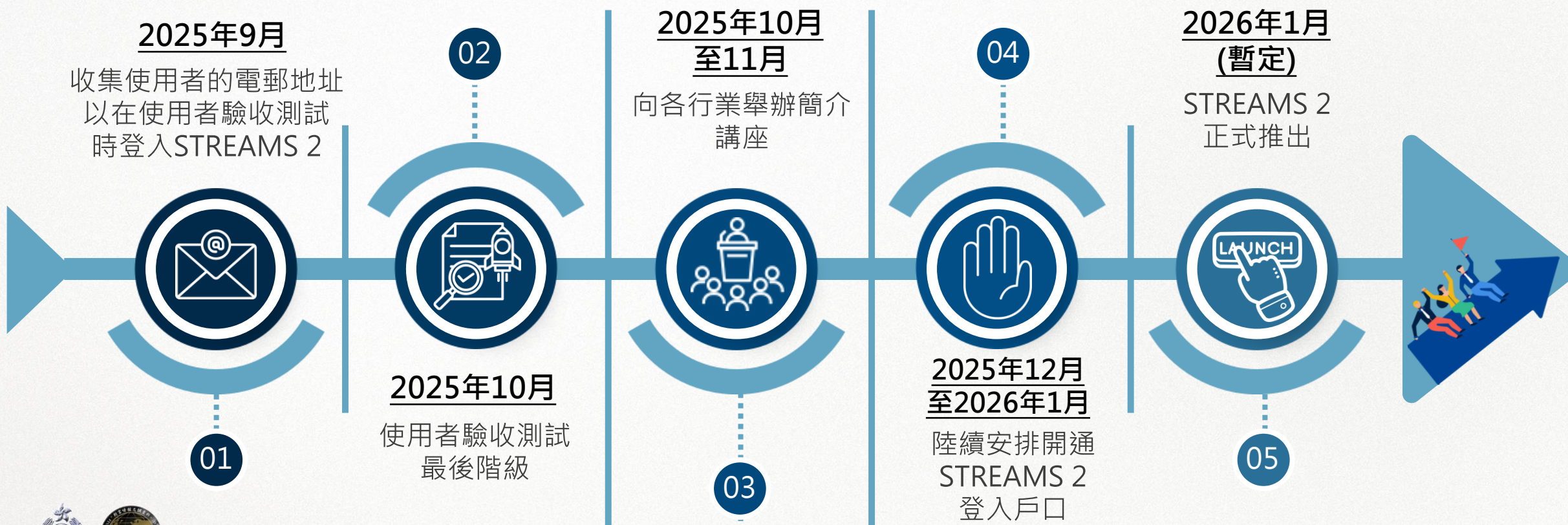
查詢熱線 (技術支援)

- Christopher CHAN
- 電話: 3660 9682 / 電郵: christopherchan@police.gov.hk





STREAMS 2 推行時間表

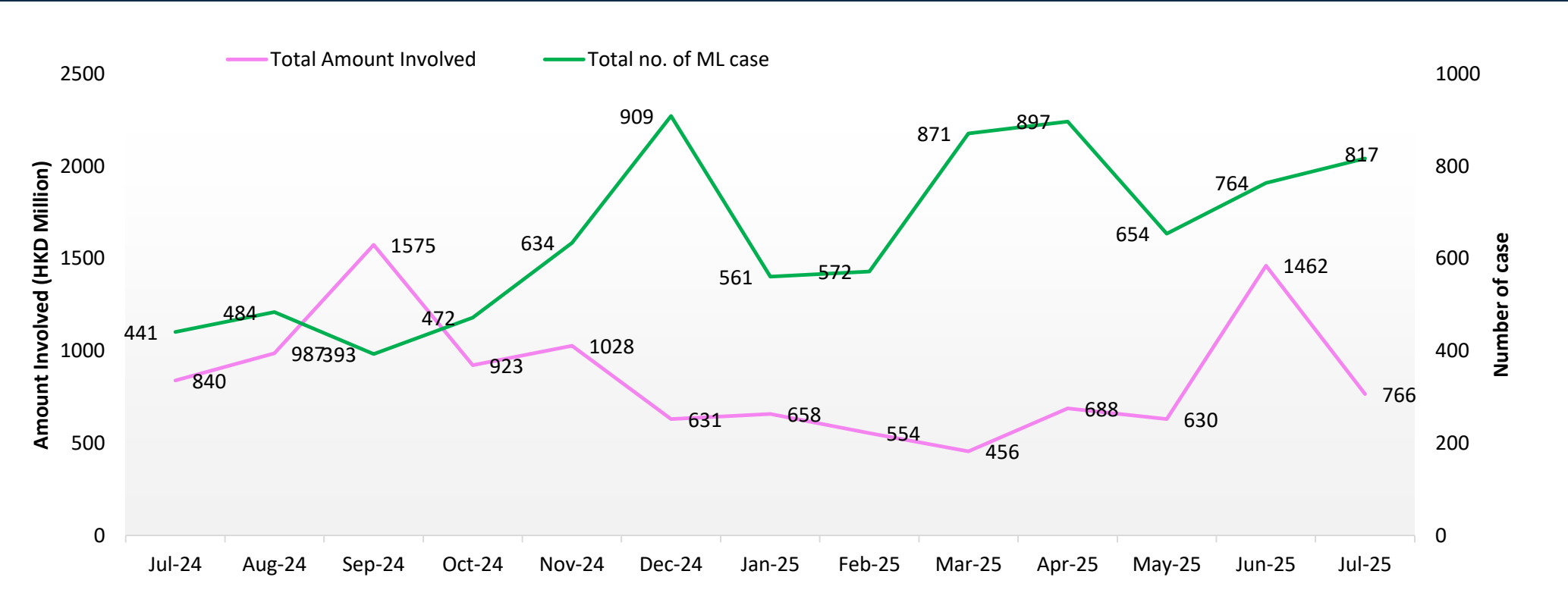




07. 洗黑錢形勢



香港洗錢形勢



	一月至七月 2024	一月至七月 2025	變化
洗黑錢案件總數	3,808	5,136	↑ 1,328 或 34.9%
涉案總金額 (港元)	86億5140 萬	52億1480萬	↓ 3,436.6 或 39.7%

欺詐/詐騙仍是首要威脅

本地 vs 其他司法管轄區





香港洗錢形勢

上游罪行

- 欺詐/詐騙
- 獨立洗錢
- 盜竊/搶劫/入室盜竊/
- 勒索
- 有組織罪案
- 賭博
- 高利貸
- 毒品相關
- 賣淫
- 稅務相關
- 貪污

行業

金融機構:

- 銀行業
- 儲值支付工具
- 虛擬資產服務提供者
- 放債人
- 保險
- 證券
- 金錢服務經營者

指定非金融機構:

- 貴金屬及寶石交易商
- 地產代理
- 信託或公司服務提供者
- 律師
- 會計師



07. 常見類型與 案例分享





常見類型與 案例分享

#1 多份可疑申請由同一職員經手處理



職員協助處理
貸款申請



使用虛假文件



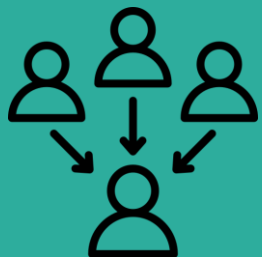
繞過
CDD/KYC
機制





常見類型與 案例分享

#2 第三方繳款 / 資金來歷不明



由無關聯的
第三方繳款



透過本票/
現金繳付保費



隱藏資金真實來源
及
將「黑錢」放置於
金融系統





常見類型與 案例分享

#3 提前大額還款/ 資金來歷不明



同時從不同平台
申請借貸



大額償還超出
個人財政能力



為洗錢過程的
「分層」和「整
合得益」階段所
利用





投入選舉 共創未來
Join the Election Together We Create the Future

2025 立法會換屆選舉
Legislative Council General Election

12月7日 7 DEC

齊投票!

elections.gov.hk

☎ 2891 1001



投票箱
Ballot Box



Financial Intelligence and Investigation Bureau
Hong Kong Police Force

多謝



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