

## ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING ADVISORY 防洗錢諮詢



The "Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance" has come into effect on 1 April 2012 and has been further revised in March 2015. Since then, the anti-money laundering and counter financing of terrorism (AML/CFT) risk continues to be a major concern for regulators in Hong Kong and several authorised institutions and licensed corporation were publicly reprimanded and fined due to deficiencies found in their AML/CFT control frameworks. Increasing numbers of financial institutions now understand that the effective money laundering/terrorist financing (ML/TF) risk management is essential for safeguarding their reputation, customer interest as well as business growth and innovation.

The AML/CFT experts from Risk Advisory Services of BDO are experienced in providing AML/CFT support to numerous authorised institutions, licensed corporations and store valued facilities. We aim to assist in meeting the regulatory requirements with you and providing advisory services for the following key control areas of AML/CFT.

香港《打擊洗錢及恐怖分子資金籌集（金融機構）條例》已於2012年4月1日生效並於2015年3月再次作出修訂。自條例生效後，香港監管機構一直高度關注防洗錢風險，多間認可機構及持牌機構先後因打擊洗錢力度不足而被公開譴責及罰款。就此，愈來愈多的金融機構明白和了解到有效的防洗錢風險管控可保障其商譽、客戶利益及持續業務發展。

立信德豪的風險諮詢服務擁有專業的防洗錢諮詢專才，服務經驗涵蓋多間認可機構、持牌機構及儲值支付工具。我們的防洗錢諮詢團隊致力協助閣下遵從法規要求，就以下各個防洗錢重點管控領域提供專業的諮詢服務。

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## 1. Management oversight

The senior management oversight and demarcation of roles and responsibilities relating to the AML/CFT control framework will be fully reviewed by our AML/CFT Advisory Services Team in accordance with the regulatory requirements, international standards and market best practice. We will also provide you a feasible improvement plan for fostering the AML/CFT risk management culture with the tone-from-the-top.

## 2. Institutional ML/TF risk assessment

Our AML/CFT Advisory Services Team will assist you to understand your institutional ML/TF risk by formulating an appropriate and comprehensive institutional risk assessment methodology with risk-based approach. Besides, we can also assist you to perform the risk assessment and issue relevant report.

## 3. AML/CFT policies and procedures

To identify deficiencies on AML/CFT controls and rectify the issues in a timely manner, our AML/CFT Advisory Services Team will conduct gap analysis on the latest AML/CFT regulations and internal policies and procedures for you. Since the AML/CFT laws and regulations are constantly changing, we will assist you to develop tailored review mechanism for ensuring the AML/CFT policies and procedures remain up-to-date and are relevant to your business operation.

## 4. Customer ML/TF risk assessment model and classification

As one of the key risk assessment processes, a robust customer risk assessment model and classification should be developed by the financial institutions with reference to their scale and size of business. In this regard, our AML/CFT Advisory Services Team will provide support by refining your customer risk assessment model, enhancing the risk classification and drafting the working notes and guidelines, so as to properly conduct the customer risk assessment.

## 5. Customer due diligence

We will assist in enhancing the workflows of customer due diligence and will provide professional advices on the requirements of due diligence information in the course of client on-boarding, periodic review, triggering event and enhanced due diligence etc. This will help your company to orderly expand your business as well as compliance with the laws and regulations.

## 1. 管理層監督

根據法規要求、國際標準及行業最佳做法，我們的防洗錢諮詢團隊全方位審查閣下防洗錢高級管理層就防洗錢方面的管控力度和職責分工的佈置，從而提供切實可行的改善方案，協助閣下提倡“由上而下”的防洗錢風險管理文化。

## 2. 機構洗錢風險評估

為協助閣下了解其自身的洗錢風險情況，我們的防洗錢諮詢團隊可按風險為本的原則，制訂一套合適及全面的機構洗錢風險評估方法。此外，我們亦可協助閣下執行相關的評估工作並擬定報告。

## 3. 防洗錢規章制度

我們的防洗錢諮詢團隊可協助閣下將最新的防洗錢法規要求與內部的規章制度進行差距分析，以識別防洗錢管控的不足之處，並及時填補漏洞。鑒於防洗錢的法規要求日新月異，我們亦可協助閣下設立防洗錢規章制度的重檢機制，以確保防洗錢規章制度是反映現況及與閣下的業務運作相關。

## 4. 客戶洗錢風險評估方法及評級

由於客戶洗錢風險評估方法及評級為防洗錢管控的重要一環，金融機構需因應其自身的業務性質和規模，設立一套健全的客戶洗錢風險評估方法及洗錢風險評級。有鑒於此，我們的防洗錢諮詢團隊可協助閣下完善客戶洗錢風險評估的方法、優化風險評級和擬定工作紙及指引，以妥善執行客戶洗錢風險評估。

## 5. 客戶盡職審查

我們可協助閣下優化客戶盡職審查的流程，並就盡職審查文件的要求提供防洗錢諮詢服務，當中涵蓋開戶盡職審查定期重檢、觸發事件重檢及加強客戶盡職審查等，確保閣下能於合法合規的大前提下有序地拓展業務。



## 6. Screening

Recently, sanction control was one of the key regulatory focuses of international and domestic regulators. As such, our AML/CFT Advisory Services Team will assist you in enhancing the sanction risk management by testing the completeness and accuracy of the sanction and PEP lists, assessing specification of the account opening and transaction screening system, enhancing the Latin/non-Latin scripts and fuzzy logic, smoothening the workflows of account opening and transaction screening, and enhancing the documentation of screening results.

## 7. Transaction monitoring and suspicious transactions reporting (STR)

Transaction monitoring is one of the key AML/CFT control areas. Irregular and large amount transactions with incommensurate background would be detected by an effective and robust transaction monitoring system, which allows you to timely submit suspicious transaction report, conduct customer review and/or exit customer relationship etc. Our AML/CFT Advisory Services Team can help you to enhance the effectiveness of automated/non-automated transaction monitoring system by analysing the transaction data, determining the relevant scenarios, thresholds and parameters as well as recommending the key performance indicators of the system. Besides, we will also provide you with the advices of STR workflows with an aim to streamline and smoothen the relevant processes.

## 8. Staff training

To deepening the understanding of the AML/CFT laws and regulations, our AML/CFT Advisory Services Team will tailor specific AML/CFT seminars and trainings to your staff for raising their awareness.

## 6. 篩查

制裁管控為國際及本地監管機構近年的監管重點之一，多間金融機構於過去數年亦因制裁風險管理不善而遭罰款。就此，我們的防洗錢諮詢團隊可協助閣下進一步加強制裁風險管控的有效性，包括測試受制裁及政治人物名單的完整性及準確性、評估開戶及交易篩查系統的規格、優化拉丁 / 非拉丁字串及模糊邏輯的對碰能力、理順開戶及交易篩查的工作流程、以及加強篩查結果之記錄備存等。

## 7. 交易監控及可疑交易報告

交易監控為防洗錢管控的重要一環。一個有效和健全的交易監控系統可為金融機構及時偵測不尋常或與背景不符的大額交易，讓其及時作出可疑交易舉報、啟動客戶重檢工作及 / 或銷戶程序等。我們的防洗錢諮詢團隊致力協助閣下提升自動 / 非自動化交易監控系統的有效性，為閣下進行交易數據分析、釐定交易監控系統的情景、門檻和參數，並就交易監控的績效指標提供意見等。此外，我們亦提供與可疑交易舉報流程的諮詢服務，協助閣下理順和拉直相關的工作流程。

## 8. 員工培訓

我們的防洗錢諮詢團隊可為閣下的員工提供防洗錢的專題講座及培訓，加強其對防洗錢法例的認識和了解。

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