信有道證券有限公司
Signal D Securities Limited

AML / CFT Assessment Questionnaire
香港打擊洗錢／恐怖分子資金籌集的評估問卷

Financial Institution Name 金融機構名稱	
Incorporation (Country) 公司註冊地(國家)	
Location (Country) 運營所在地(國家)	

Additional document elaborate how does the FI to remediate the potential gap identified should be provided if the response to any of the question is 'No'': 如任何問題的答覆為"否"，請額外提供文件說明貴機構如何就所識別出的潛在差距作出補救。

Except as stated in the Question, if the response to any of the question is 'N/A'' Please explain the reasons. 除文中明確要求之外，如任何問題的答覆為"不適用"，請說明不適用的原因。

A.	Risk-based approach ("RBA") 風險為本的方法			
		Yes 是 / 有	No 否 / 沒有	N/A 不適用
A.01	Do you identify, assess and understand the ML/TF risks to which you are exposed and take AML/CFT measures that are commensurate with those risks in order to mitigate them effectively? 貴機構有否識別、評估及了解貴機構所面對的洗錢/恐怖分子資金籌集風險，並採取與該等風險相稱的打擊洗錢/恐怖分子資金籌集措施，以便有效地減低該等風險？			
A.02	Do you holistically consider all relevant risk factors including country risk, customer risk, product/service/transaction risk, delivery/distribution channel risk and, where applicable, other risks that you are exposed to depending on your specific circumstances. 貴機構是否全面考慮所有相關風險因素，當中包括國家風險、客戶風險、產品/服務/交易的風險、交付/分銷渠道的風險，以及視乎貴機構的具體情況所面對的其他風險(如適用)。			
A.03	Do you assess the ML/TF risks associated with a customer or a proposed business relationship, which would determine the level of CDD measures and the level and type of ongoing monitoring, and support your decision on whether to enter into, continue or terminate the business relationship? 貴機構有否評估客戶或擬建立的業務關係所涉及的洗錢/恐怖分子資金籌集風險，而有關的評估結果將釐定應採取何種程度的客戶盡職審查措施以及持續監察的程度和類別，並且支持貴機構就是否建立、繼續或終止業務關係所作的決定？			

A.04	Do you adopt an RBA in the design and implementation of your customer risk assessment framework, which should be designed taking into account the results of your institutional risk assessment and commensurate with the risk profile and complexity of your customer base? 貴機構有否採用風險為本的方法來設計及實施客戶風險評估框架，而該框架在顧及貴機構的機構風險評估的結果後才予以制定，並與貴機構客戶群的風險狀況及複雜程度相稱？			
A.05	Do you keep your policies and procedures under regular review and assess that your risk mitigation procedures and controls are working effectively? 貴機構有否定期覆核政策及程序，以及評估減低風險程序及管控措施是否有效運作？			
A.06	When conducting customer risk assessment, do you take into account relevant risk factors of a customer holistically including the country risk, customer risk, product/service/transaction risk, and delivery/distribution channel risk? 在進行客戶風險評估時，貴機構有否全面考慮客戶的相關風險因素，包括國家風險、客戶風險、產品/服務/交易的風險和交付/分銷渠道的風險？			
A.07	Do you periodically review and, where appropriate, update your risk assessment of a particular customerand adjust the extent of the CDD and ongoing monitoring to be applied to the customer? 貴機構有否定期覆核並在適當情況下更新個別客戶的風險評估，以及調整適用於該客戶的客戶盡職審查及持續監察的程度？			

B.	AML / CFT Systems 打擊洗錢/ 恐怖份子資金籌集制度			
		Yes 是 / 有	No 否 / 沒有	N/A 不適用
B.01	Do you implement adequate and appropriate AML/CFT Systems, having regard to the nature, size and complexity of their businesses and the ML/TF risks arising from those businesses. 貴機構是否考慮業務的性質、規模及複雜程度以及有關業務帶來的洗錢/恐怖分子資金籌集的風險，實施充分及適當的打擊洗錢/恐怖分子資金籌集制度。			
B.02	Have you established appropriate compliance management arrangements that facilitate the implementation of AML/CFT Systems to comply with relevant legal and regulatory obligations as well as to manage ML/TF risks effectively? 貴機構有否設立適當的合規管理安排，以便實施打擊洗錢/恐怖分子資金籌集制度，藉以履行相關法律及監管責任以及有效地管理洗錢/恐怖分子資金籌集風險？			
B.03	Is your senior management responsible for oversighting and implementing effective AML/CFT Systems that can adequately manage the ML/TF risks identified? 貴機構的高級管理層是否有責任監督和執行有效並足以管理所識別的洗錢/恐怖分子資金籌集風險的打擊洗錢/恐怖分子資金籌集制度？			

B.04	Have you established an independent audit function which has a direct line of communication to seniormanagement of your firm and regularly review the AML/CFT Systems to ensure effectiveness? 貴機構有否設立能與貴機構高級管理層直接溝通的獨立審核職能，同時該職能定期對打擊洗錢/恐怖分子資金籌集制度作出覆核，以確保成效？			
B.05	If appropriate, have you sought review from external parties regarding your firm's AML/CFT Systems? 在適當情況下，貴機構有否尋求外界機構對本身的打擊洗錢/恐怖分子 資金籌集制度進行覆核？			

C.	Customer Due Diligence ("CDD") 客戶盡職審查			
		Yes 是 / 有	No 否 / 沒有	N/A 不適用
C.01	Do you carry out CDD measures in relation to a customer at the outset of a business relationship? 貴機構是否在開始建立業務關係之時對客戶執行客戶盡職審查措施?			
C.02	Do you carry out CDD measures in relation to a customer when you suspect that the customer or the customer's account is involved in ML/TF. 當貴機構懷疑客戶或客戶的戶口涉及洗錢/恐怖分子資金籌集時是否對客戶執行客戶盡職審查措施？			
C.03	Do you carry out CDD measures in relation to a customer when you doubt 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. 當貴機構懷疑過往為識別客戶的身分或核實客戶的身分而取得的資料的真實性或充分性時，是否對客戶執行客戶盡職審查措施？			
C.04	Do you identify and verify the true and full identity of each customer by reference to documents, data or information provided by a reliable and independent source. 貴機構是否參考可靠及獨立來源提供的文件、數據或資料去識別和驗證每名客戶的真實和完整的身份。			
C.05	In verifying the identity of a customer that is a natural person, do you verify the name, date of birth, unique identification number and document type of the customer by reference to documents, data or information provided by a reliable and independent source? 在核實自然人客戶的身分時，貴機構有否根據由可靠及獨立來源提供的文件、數據或資料，核實客戶的姓名、出生日期、獨特識別號碼及文件類別？			

C.06	In verifying the identity of a customer that is a legal person, do you verify the name, legal form, current existence (at the time of verification) and powers that regulate and bind the legal person by reference to documents, data or information provided by a reliable and independent source? 在核實屬於法人的客戶的身分時，貴機構有否根據由可靠及獨立來源提供的文件、數據或資料，核實其名稱、法律形式、目前(在核實時）是否存在，以及規管及約束該名法人的權力？			
C.07	If the customers are associations, clubs, societies, charities, religious bodies, institutes, mutual and friendly societies, co-operative and provident societies, do you satisfy yourself as to the legitimate purpose of the organization? 若客戶為會社、會所、社團、慈善組織、宗教組織、院校、友好互助社團、合作社或公積金社 團，貴機構本身是否信納該等機構的合法目的？			
C.08	In verifying the identity of a customer that is a trust or other similar legal arrangement, do you verify the name, legal form, current existence (at the time of verification) and powers that regulate and bind the trust or other similar legal arrangement by reference to documents, data or information provided by a reliable and independent source? 在核實屬於信託或其他同類法律安排的客戶的身分時，貴機構有否根據由可靠及獨立來源提供的文件、數據或資料，核實其名稱、法律形式、目前（在核實時）是否存在，以及規管及約束該信 託或其他同類法律安排的權力？			
C.09	Where a customer is a legal person, a trust or other similar legal arrangement, do you identify the connected parties of the customer by obtaining their names? 如客戶屬於法人、信託或其他同類法律安排，貴機構有否取 得其姓名或名稱，以識別該名客戶的有關連者？			
C.10	Do you identify the beneficial owner in relation to a customer, and take reasonable measures to verify the beneficial owner's identity so that you are satisfied that you know who the beneficial owner is? 貴機構有否識別客戶的所有實益擁有人，並採取合理措施核實該實益擁有人的身分，從而使貴機構信納它知道該實益擁有人為何人？			
C.11	Do you identify and take reasonable measures to verify the identity and authority of a Person purporting to act on behalf of the customer. 貴機構有否識別並採取合理措施去核實看似代表客戶行事的人的身分及授權。			
C.12	Do you take appropriate measures to ensure reliability of documents, data or information obtained. 貴機構是否採取適當的措施，以確保所取得的文件、數據或資料的可靠性。			

C.13	Unless the purpose and intended nature of the business relationship are obvious, have you obtained satisfactory information from all new customers as to the intended purpose and reason for opening the account or establishing the business relationship, and recorded the information on the account opening documentation? 除非業務關係的目的及擬具有的性質顯而易見，貴機構有否就開立戶口或建立業務關係的擬有目的及理由方面，向所有新客戶索取令貴機構滿意的資料，並把該等資料記錄在開戶文件內？			
C.14	Do you always complete verification of the identity of a customer and any beneficial owner of the customer before or during the course of establishing a business relationship? 貴機構是否時刻在建立業務關係之前或過程中完成核實客戶及 該客戶的任何實益擁有人的身分？			
C.15	Do you conducted simplified customer due diligence ("SDD") instead of full CDD measures given reasonable grounds to support it. If you have not conducted any SDDs for your customers, please confirm an N/A response. 貴機構是否在合理理據支持下才採用簡化客戶盡職審查（簡化盡職審查），而無須進行全面客戶盡職審查措施。如貴機構沒有對客戶採取任何簡化盡職審查，請填選“不適用”。			
C.16	Do you apply equally effective customer identification procedures and ongoing monitoring standards for customers not physically present for identification purposes as for those where the customer is available for interview. 貴機構是否對沒有為身分識別的目的而現身的客戶，進行相等於與現身的客戶同樣有效的客戶身分識別程序及持續監察標準。			
C.17	Have you implemented appropriate risk management systems to determine and identify whether a customer or the beneficial owner is a politically exposed person ("PEP") and to adopt additional measureson them. 貴機構有否落實適當的風險管理系統，以斷定和識別某名客戶或某名實益擁有人是否政治人物，並須對其採取額外措施。			
C.18	Due to the higher ML/TF risks associated with bearer shares and nominee shareholders, do you take appropriate measures to ensure that they are not misused for money laundering. 鑑於持票人股份及代名人股東涉及較高的洗錢／恐怖分子資金籌集風險，貴機構是否採取適當措施，以確保有關股份及股東不會被濫用作洗錢用途？			
C.19	For corporate customers that are companies with capital in the form of bearer shares, do you have procedures to establish the identities of the beneficial owners of such shares and ensure that you are notified whenever there is a change of beneficial owner of such shares? 如公司客戶是在股本中有持票人股份的公司，貴機構有否採取程序以確立該等股份的實益擁有人的身分，並確保即時獲知會有關實益擁有人的變動情況？			

C.20	In the case where a customer is identified to have nominee shareholders in its ownership structure, do you obtain satisfactory evidence of the identities of the nominees, and the persons on whose behalf they are acting, as well as the details of arrangements in place, in order to determine who the beneficial owner is? 如識別出客戶的擁有權結構中有代名人股東，貴機構有否取得有關該些代名人及其代表行事的人士的身份信納證明，以及所作安排的詳情，以便決定誰是實益擁有人？			
C.21	Do you pay particular attention to, and exercise extra care in respect of: 貴機構是否特別注意下述情況，並應格外審慎： (a) business relationships and transactions with persons (including legal persons and other FIs) from or in jurisdictions identified by the FATF as having strategic AML/CFT deficiencies. 與來自或在被特別組織識別為在打擊洗錢/恐怖分子資金籌集方面存在策略性缺失的司法管轄區的人士(包括法人及其他金融機構)的業務關係及交易 (b) transactions and business connected with jurisdictions assessed as higher risk. 與評估為較高風險的司法管轄區有關連的交易及業務			
C.22	If yes in C.21, have you also performed the following due diligence procedures for such customers? 如 C.21 回答是，貴機構 有否對有關客戶進行以下盡職審查程序？ (a) obtaining the approval of senior management to commence or continue the relationship. 取得有關高級管理層的批准，以開展或繼續該業務關係 (b) either taking reasonable measures to establish the relevant customer's or beneficial owner's source of wealth and the source of the funds that will be involved in the business relationship or taking additional measures to mitigate the risk of ML/TF. 採取合理措施，以確立有關客戶或實益擁有人的財富來源，及該業務關係將會涉及的資金來源或採取額外措施，以減低所涉及洗錢／恐怖分子資金籌集的風險			
C.23	Have you used any intermediaries to perform any part of your CDD measures? 貴機構有否任用任何中介人代為執行任何部分的客戶盡職審查措施？			
C.24	Do you have the ultimate responsibility for ensuring CDD requirements are met, when intermediaries were used to perform any part of the CDD measures. 當貴機構藉著中介人執行任何部分的客戶盡職審查措施時，是否確保符合客戶盡職審查規定的最終責任仍由持牌法團／有聯繫實體承擔。			

C.25	Do you refrain from maintaining (for any customer) anonymous accounts or accounts in fictitious names? 貴機構有否禁止為任何客戶維持匿名戶口或以虛構的姓名 或名稱維持戶口？			
C.26	Do you document your assessment of jurisdictional equivalence and review your assessment from time totime? 貴機構有否將貴機構的司法管轄區對等評估記錄在案，及不時檢 討有關評估？			

D.	Terrorist financing, financial sanctions and proliferation financing 恐怖份子資金籌集、金融制裁及擴散資金籌集			
		Yes 是 / 有	No 否 / 沒有	N/A 不適用
D.01	Is your firm operating internationally? If your firm is not operating internationally, please confirm an N/Aresponse. 貴機構是否在海外運作？如貴機構並非在海外運作，請填選“不適 用”.			
D.02	If yes in D.01, are you aware of the scope and focus of relevant sanctions regimes in those jurisdictions? 如 D.01 回答是，貴機構是否注意該等司法管轄區的相關制裁制度的範疇及重點？			
D.03	Do you maintain a database (internal or through a third-party service provider) of names and particulars of terrorists and designated parties which consolidates the various lists that have been made known to you? 貴機構有否備存記錄恐怖分子及指定人士名稱及詳細資料的數據庫(不論是由內部或透過第三方 服務供應商備存)，以綜合所知的各種名單的資料？			
D.04	Do you establish and maintain adequate screening mechanism to avoid establishing business relationship or conducting transactions with any terrorist suspects and possible designated parties? 貴機構是否制訂及維持足夠的篩查機制,以避免與任何恐怖份子嫌疑人物及潛在指定人士建立業務關係或進行交易？			

E.	Cross-border correspondent relationships 跨境代理關係			
		Yes 是 / 有	No 否 / 沒有	N/A 不適用
E.01	Do you establish or maintain any cross-border correspondent relationships? 貴機構有否建立或維持任何跨境代理關係？			

Space for additional information (Please indicate which question the information is referring to.)

Name:
Position / Title:
Signature:
Date: