

Bowlea Securities Limited uses this AML questionnaire as an aid to conduct customer due diligence. We use this questionnaire alongside our AML Policies and CDD Policies in order to provide a basis for conducting client due diligence in a manner consistent with the risk profile presented by the client to ensure adequate due diligence, which may include independent verification or follow up of the answers and documents provided.

保利證券有限公司運用此反洗錢問卷對客戶進行盡職調查。此問卷配合我司的反洗錢和客戶盡職調查政策一起使用，以便與客戶提供的風險概況一致的方式進行客戶盡職調查，並確保充分盡職調查的責任，包括獨立核實或對所提供的答案和文件的跟進。

Name of Financial Institution 填寫問卷的金融機構名稱:	
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Know Your Client / Anti-Money Laundering Questionnaire 瞭解您的客戶 / 防止洗錢問卷		
I. General AML Policies, Practices and Procedures 一般的防止洗錢的政策、處理規章及作業準則:	YES 是	NO 否
1. Has your regulator published guidance notes/policies/laws to combat money laundering/terrorist financing, and is the FI subjected to, and fully complied with such laws 金融機構的監管機關是否發出指引/政策/法律，以打擊洗錢/恐怖份子融資，而金融機構是受到監管，並且完全符合相關法律規定?		
2. Hasn't the FI been subjected to sanctions or punitive actions in relation to anti-money laundering/anti-terrorist financing by regulators/law enforcer in the past five years 在過去的五年，金融機構沒有受到監管機構/執法者有關防止洗錢/反恐怖份子融資的制裁或懲罰性的行動?		
3. Is the AML compliance program approved by the FI's board or a senior committee 防止洗錢合規計劃是否已取得金融機構董事會或高層委員會的批核?		
4. 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 金融機構是否有法律及合規計劃包含指定一位合規部主管，負責協調及監管防止洗錢架構?		
5. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions 金融機構是否有訂定具體書面政策，記錄其已實施的程序，以防止、偵測及報告可疑交易活動?		

6. 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 除了政府監管/主管機關的審查，金融機構是否設有一個內部稽核部門，或者委任其它獨立第三者，定期性地評估防止洗錢政策及處理規章？		
7. Does the FI have a policy prohibiting accounts/relationships with fictitious clients/shell banks 金融機構是否有政策禁止為虛假客戶及空殼銀行開立帳戶及建立業務關係？		
8. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of fictitious clients through any of its accounts or products 金融機構是否有制訂政策以合理地確保它不會與虛假客戶或其代表作任何金融上的交易活動？		
9. Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates 金融機構是否有制訂政策以規範與高度涉入政治人士、其家庭成員和緊密關係的夥伴？		
10. Does the FI have record retention policies/procedures that comply with applicable law 金融機構是否依法律規定而制訂適當的文件保存年限政策/作業準則？		
11. 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 金融機構是否要求其在國內及境外地區的所有分公司以及附屬機構，遵守其總部的洗錢防制政策及作業規章？		
II. Risk Assessment 風險評估:		
12. Does the FI have a risk-based assessment of its customer base and their transactions 金融機構是否有對其客戶及客戶交易活動進行風險評估？	YES 是	NO 否
13. 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 金融機構是否有針對透過其進行高風險違法活動的客戶和交易制訂適當程度的強化客戶審查工作？		
III. Know Your Customer, Due Diligence and Enhanced Due Diligence 瞭解您的客戶 (KYC)、客戶審查及強化客戶審查工作:		
14. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions 金融機構是否有訂定鑒別客戶身分的辦法，透過在開設帳戶及進行交易時取得客戶資訊？		
15. Does the FI have a requirement to collect information regarding its customers' business activities 金融機構是否有要求蒐集關於客戶業務活動的資料？		
16. Does the FI assess its FI customers' AML policies or practices 金融機構有否評估其金融機構客戶的防洗錢政策及處理規章？		

17. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information 金融機構，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？		
18. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information 金融機構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？		
19. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers 金融機構是否根據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？		
20. Does the FI have a requirement to collect information regarding the customers' tax residency and tax compliance status (including FATCA) 金融機構是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)？		
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：	YES 是	NO 否
21. 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？		
22. 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，金融機構是否有作業準則進行辨別？		
23. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities 金融機構有否檢視經政府/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？		
V. Transaction Monitoring 交易監控：	YES 是	NO 否
24. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and stocks transfers etc. 金融機構是否有監控規章，用於監控某些不尋常及潛在可疑的交易（如 資金轉移及股票轉移等）？		
VI. Staff Training 員工培訓	YES 是	NO 否
25. Does the FI provide AML training to relevant employees that includes 金融機構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.		
26. Does the FI retain records of its training sessions including attendance records and relevant training materials used 金融機構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？		
27. 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，金融機構是否有制訂政策向其相關員工作宣導溝通？		
28. Doesn't the FI employ third parties to carry out some of the functions of the FI 金融機構沒有將部分業務外包出去？		
29. If the answer to question 28 is "No", does the FI provide AML training to relevant third parties that includes 如果問題28的回答為“否”，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.		
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.)		
Name: 填寫者姓名		
Title: 職稱		
Signature: 簽署		
Date: 填寫日期		