



ANTI MONEY LAUNDERING (“AML”) POLICY

反资金洗净(“反洗钱”)政策

1. INTRODUCTION

引言

PRIMETIME GLOBAL MARKETS PTY LTD (hereinafter referred to as 'PGM' or the 'Company') is a brokerage firm that operates globally.

PRIMETIME GLOBAL MARKETS PTY LTD (以下称 被称为“ PGM”或“公司”) 是一所在全球开展业务的经纪公司。

2. SCOPE OF POLICY

政策范围

This policy applies to all PGM employees, appointed service providers and products and services offered by PGM. All business units and locations within PGM will cooperate to create a cohesive effort in the fight against money laundering. Each business unit and location has implemented risk- based procedures reasonably expected to prevent, detect and cause the reporting of transactions. All efforts exerted will be documented and retained. The MLRO is responsible for filing Suspicious Transaction Reports ("SARs") to the FIU. Any contacts by law enforcement or regulatory agencies related to the Policy shall be directed to the MLRO.

本政策适用于所有PGM的员工, 任命的生产商以及PGM提供的产品和服务。PGM内的所有业务部门和分支机构都将合作, 为反洗钱(俗称“反洗钱”)做出团结一致的努力。每个业务部门和地点均已实施以风险为基础的规程, 合理预测可以防止, 侦查并导致该交易的举报。所有施加的工作都会被记录并保留。反洗钱合规委员会负责启动可疑活动报告(SARs) 或向适当的执法或监管机构提交其他必需的报告。

The MLRO shall:

该委员会应:

- (a) Receive internal reports of (suspicions of) money laundering
接收有关洗钱(怀疑)的内部报告
- (b) Investigate reports of suspicious events
调查可疑事件的报告
- (c) Make reports of relevant suspicious events to the relevant authorities
向有关当局提交有关可疑事件的报告
- (d) Ensure the adequacy of arrangements made for the awareness and training of staff and advisers
确保工作人员和顾问受到充分的意识和培训安排
- (e) Report at least annually to the Company's governing body on the operation and effectiveness of the Company's systems and controls.
至少每年向公司监管机构报告公司系统和控制的运作和有效性。
- (f) Monitor the day-to-day operation of anti-money laundering policies in relation to: the development of new products; the taking on of new clients; and changes in the Company's business profile.
监测有关以下方面的反洗钱政策的日常运作: 开发新产品; 吸纳新客户; 以及公司业务概况的变化。

3. POLICY

政策

It is the policy of PGM to actively pursue the prevention of money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities. PGM is committed to AML compliance in standards accordance with applicable law and requires its employees and appointed service providers to adhere to these in preventing the use of its products and services for money laundering purposes.

PGM的政策是积极开展预防洗钱活动以及任何有助于洗钱或资助恐怖主义或犯罪活动的活动。 PGM致力于根据适用法律遵守反洗钱规定, 并要求其员工和指定生产商遵守这些标准, 以防止将其产品和服务用于洗钱目的。

For the purposes of the Policy, money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have been derived from legitimate origins or constitute legitimate assets.

就本政策而言, 洗钱一般被定义为从事旨在掩盖或掩饰犯罪所得收益的真实来源的行为, 从而使非法收益看来是源于合法来源或构成合法资产。

4. DEFINITION OF MONEY LAUNDERING

洗钱的定义

Money laundering is the act of concealing the transformation of profits from illegal activities and corruption into ostensibly "legitimate" assets. The dilemma of illicit activities is accounting for the origin of the proceeds of such activities without raising the suspicion of law enforcement agencies. Accordingly, considerable time and effort is put into devising strategies which enable the safe use of those proceeds without raising unwanted suspicion.

洗钱是将非法活动和贪污所得的利润转化为表面上“合法”资产的行为。非法活动的两难取决于这类活动的收益来源不会引起执法机构怀疑。因此，在设计能够安全地使用这些收益而不会引起不必要的怀疑的策略上投入了大量时间和精力。

After money has been suitably laundered or "cleaned", it can be used in the mainstream economy for accumulation of wealth, such as acquisitions of properties, or otherwise spent.

在对资金进行适当的洗净或“清理”之后，可以将其用于主流经济中以积累财富，例如购置财产或以其他方式花费。

Money laundering activity includes:

洗钱活动包括:

- . Acquiring, using or possessing criminal property
取得，使用或拥有犯罪财产
- . Handling the proceeds of crimes such as theft, fraud and tax evasion
处理盗窃，欺诈和逃税等犯罪所得
- . Being knowingly involved in any way with criminal or terrorist property
有意地以任何方式卷入犯罪或恐怖分子财产
- . Entering into arrangements to facilitate laundering criminal or terrorist property
订立任何安排以促成清洗犯罪或恐怖分子财产
- . Investing the proceeds of crimes in other financial products
将犯罪收益投资于其他金融产品
- . Investing the proceeds of crimes through the acquisition of property/assets
将犯罪收益通过购置财产/资产以作出投资
- . Transferring criminal property
转让犯罪财产。

There is no single stage of money laundering; methods can range from the purchase and resale of luxury items such as a car or jewelry to passing money through a complex web of legitimate operations. Usually the starting point will be cash but it is important to acknowledge that money laundering is defined in terms of criminal property. This can be property in any conceivable legal form, whether money, rights, real estate or any other benefit, if you know or suspect that it was obtained, either directly or indirectly, as a result of criminal activity and you do not speak up then you too are taking a part in the process.

洗钱没有一个单一的阶段; 洗钱的方法可从购买和转售汽车或珠宝等奢侈品到通过复杂的合法运营网络洗钱。起点通常是现金，但重要的是要认识到洗钱是根据犯罪财产定义的。犯罪财产可以是任何可能的法律形式的财产，无论是金钱，权利，房地产还是任何其他利益，如果您知道或怀疑该财产是直接或间接从犯罪活动中获得，而没有发声的话，即等如参与其中。

The money laundering process usually follows three stages:

洗钱过程分为三个阶段:

- (a) Placement
安置

Disposal of the initial proceeds derived from illegal activity e.g. into a bank account.

处置源自非法活动的初始收益，例如：汇入银行帐户。

- (b) Layering
分层

The money is moved through the system in a series of financial transactions in order to disguise the origin of the cash with the purpose of giving it the appearance of legitimacy.

资金在系统中通过一系列金融交易的移动，目的是为了掩盖现金的来源，从而使其看似合法。 4

- (c) Integration
整合

Criminals are free to use the money as they choose once it has been moved back into the financial system as apparently "clean" funds.

一旦犯罪分子将这些看似合法的资金从系统中移走，犯罪分子就可以自由使用这些资金。

No financial sector business is immune from the activities of criminals and the Company should consider the money laundering risks posed by the products and services they offer.

任何金融行业的业务都无可避免地有机会被犯罪分子利用，公司应考虑其提供的产品和服务所带来的洗钱风险。

The three basic stages may occur as separate or distinct phases. They may occur simultaneously or more commonly, they may overlap. The way in which these basic stages are used will depend on the available laundering mechanisms and the requirements of the criminal organisations.

5. WHAT IS TERRORIST FINANCING?

什么是反恐融资 (CTF) ?

Terrorist financing is the financial support, in any form, of terrorism or those who encourage, plan or engage in terrorism. The Company must therefore ensure that: (i) clients are not terrorist organisations themselves; and (ii) they are not providing the means through which terrorist organisations are being funded.

恐怖主义融资是合法企业和个人, 出于意识形态, 政治或其他原因选择为支持恐怖活动或组织提供资金的过程。因此, 公司必须确保: (i) 客户本身不是恐怖组织; (ii) 他们不是在提供方法令恐怖组织得到资助。

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used for criminal purposes.

恐怖主义融资可能不涉及犯罪行为的收益, 而是企图掩盖资金的来源或预计用途, 这些资金以后将用于犯罪目的。

6. RISK-BASED APPROACH

以风险为基础的方法

The level of due diligence required when considering anti-money laundering procedures within the company is to take a risk-based approach. This means the amount of resources spent in conducting due diligence in any one relationship that is subject risk should be in proportion to the magnitude of the risk that is posed by that relationship.

在考虑公司内部的反洗钱程序时, 所需的尽职调查程度应采取以风险为基础的方法。这意味着在对任何关系(亦即主体风险)进行尽职调查所花费的资源应与该关系所构成的风险大小成比例。

These can be broken down into the following areas:

这些可以分为以下几个方面:

Client Risk

客户风险

Different client profiles have different levels of risks attached to them. A basic Know your Client (KYC) check can establish the risk posed by a client. For example, near-retired individuals making small, regular contributions to a savings account in line with their financial details poses less of a risk than middle-aged individuals making ad-hoc payments of ever-changing sizes into a savings account that does not fit into the profile of the clients' standing financial data. The level of the due diligence conducted on the latter would be higher than that carried out on the former as the potential threat of money laundering in the second case would be perceived as being greater. Corporate structures can be used as examples of clients that could carry a higher risk profile than the one just seen, as these can be used by criminals to introduce layers within transactions to hide the source of the funds, and like that, clients can be categorised into different risk bands.

不同的客户资料具有不同的风险级别。基本的了解您的客户 (KYC) 检查可以确定由客户一方构成的风险。例如, 接近退休的个人根据其财务状况向储蓄账户定期进行小额缴款, 所构成的风险要小于一位不断将大小不断变化的一次性存款存入储蓄账户的中年个人, 该储蓄账户不符合该客户的现有财务数据。对后者进行的尽职调查的强度将高于对前者进行的尽职调查的强度, 因为在第二种情况下洗钱的潜在威胁会被视为更大。如以公司结构作为客户例子, 则公司客户承载的风险比之前的例子更高, 因为公司结构可被犯罪分子用作多次交易以隐藏资金来源, 这样就可以将客户划分为不同的风险等级。

Product Risk

产品风险

This is the risk posed by the product or service itself. The product risk is driven by its functionality as a money laundering tool.

产品风险是指产品或服务本身构成的风险。产品风险取决于其作为洗钱工具的效能。

When identifying the risk associated with its products, services or transactions, the Company will consider the risk related to:

- a) the level of transparency, or opaqueness, the product, service or transaction affords;
- b) the complexity of the product, service or transaction; and
- c) the value or size of the product, service or transaction.

Country Risk

国家风险

The geographic location of the client or origin of the business activity has a risk associated with it, this stems from the fact that countries around the globe have different levels of risk attached to them.

客户的地理位置或业务活动的源头具有关联的风险，这是由于全球各国所附带的风险级别不同而引起的。

The Company would determine the extent of their due diligence measure required initially and on an ongoing basis using the above three risk areas, amongst other factors.

公司会使用上述三个风险分类来确定最初需要并持续进行的尽职调查措施的程度。

7. CLIENT IDENTIFICATION PROCEDURE

客户识别程序

has adopted a Client Identification Procedure (CIP). PGM will provide notice that they will seek identification information; collect certain minimum client identification information from each client, record such information and the verification methods and results.

PGM采用了一套客户标识程序（CIP）。PGM会通知客户，本公司会要求客户提供识别身份的信息；从每个客户那里收集某些最低限度的客户身份资讯，记录这些资讯以及验证方法和结果。

8. NOTICE TO CLIENTS

客户须知

PGM will provide notice to clients that it is requesting information from them to verify their identities, as required by applicable law.

根据适用法律的要求，PGM会通知客户告知他们要求客户提供信息以验证其身份。PGM会通知客户，本公司会根据适用法律要求客户提供识别身份的信息以验证其身份。

9. KNOW YOUR CLIENT

了解您的客户

When a business relationship is formed, in order to establish what might constitute normal activity later in the relationship, it is necessary for the company to ascertain the nature of the business a client expects to conduct.

为了确定以后在业务关系中可能构成正常运作的范围，在建立业务关系后，公司有必要确定客户期望开展的业务的性质。

Once an on-going business relationship has been established, any regular business undertaken for that client can be assessed against the expected pattern of activity of the client. Any unexplained activity can then be examined to determine whether there is a suspicion of money laundering or terrorist financing.

一旦建立了持续的业务关系，就可以根据客户的常规业务来评估该客户的预期运作模式为进行的任何。其后就可以审查任何无法解释的运作，以确定是否存在洗钱或恐怖分子融资的嫌疑。

Information regarding a client's income, occupation, source of wealth, trading habits and the economic purpose of any transaction is typically gathered as part of the provision of advice. At the start of the relationship personal information is also obtained, such as, nationality, date of birth, and residential address. These pieces of information should also be considered in respect to the risk of financial crime (including AML and CTF). For high risk transactions, it might be appropriate to seek further information to those already provided by the client.

一般会建议收集作为评估基准的数据包括：有关客户收入，职业，财富来源，交易习惯和任何交易的经济目的。在建立关系时会收集个人资讯，例如国籍，出生日期和居住地址。在评估金融犯罪（包括AML反资金洗净和CTF反恐怖分子资金筹集）的风险时亦应考虑这些资讯。对于高风险交易，可能需要对客户提供的信息进行验证。

10. SOURCE OF FUNDS

资金来源

When a transaction takes place, the source of funds, i.e. how the payment is to be made, from where and by who, must always be ascertained and recorded in the client file (this would usually be achieved through retaining a copy of the cheque/direct debit mandate or any bank transaction receipt). In some instances, enhanced due diligence measures may be applied by the Company.

进行交易时，必须确定并记录其资金来源，即付款方式，来源和通过谁，在客户档案中（一般可以通过保留支票，直接付款授权书的副本或任何形式的银行转账收据）。

11. IDENTIFICATION

身份证明

The standard identification requirement for clients who are private individuals are generally governed by the circumstances relating to the client and the product type that is being dealt in, i.e. the level of risk attributed to the

product whether it is a low risk, medium risk or high risk product. Taking that into account, for low and medium risk products the following pieces of information are required as a standard for identification purposes:

个人客户的标准识别要求一般取决于与客户有关的情况和所处理产品的类型（即：产品的风险等级：产品是否属于降低风险；中级风险或增加风险的产品）。考虑到这一点，对于降低风险和中等风险的产品，需要以下信息作为标准以进行识别：

- Valid official identification document such as a national Identity Card
身份证名文件上的全名
- Recent proof of residential address
住址

12. VERIFICATION

验证

Verification of the information obtained must be based on reliable and independent sources – which might either be documents produced by the client, or electronically by the firm, or by a combination of both. Where business is conducted face-to-face, the Company must see, and take copies of, originals of any documents involved in the verification.

所获得信息的验证必须基于可靠且独立的来源 - 可以是客户产生的文件，也可以是公司的电子文件，或两者组合。当面对面开展业务时，公司应查看验证所涉及的任何文件的原件。

If documentary evidence of an individual's identity is to provide a high level of confidence, it will typically have been issued by a government department or agency, or by a court, because there is a greater likelihood that the

authorities will have checked the existence and characteristics of the persons concerned. In cases where such documentary evidence of identity may not be available for an individual, other evidence of identity may give the Company reasonable confidence in the client's identity, although the Company should weigh these against the risks involved.

如果要证明个人身份的书面证据能使人高度信任，则一般应由政府部门或机构或法院签发，因为当局有较高可能已检查过有关个人的存在和背景。如果无法为个人获得此类身份证明文件，则其他身份证明文件也可以使公司对客户的身份有合理的信任，尽管公司应权衡这些风险。

If the identity is to be verified from documents, this should be based on:

如果要从文件中验证身份，则应基于：

Either a government issued document which incorporates:

包含以下内容的政府发出的文件中：

- The client's full name, and
客户的全名，以及
- Their residential address
他们的住址

Photographic Government Issued Identity Documents

政府发出的有照片的身份证件

- Valid passport
有效护照
- National Identity card
国民身份证

Alternatively, this can be done by a non-photographic government issued document which incorporates the client's full name, supported by a second document, which incorporates:

另外，也可以通过政府发出的身份证件(没有照片)来完成，该文件需包含客户的全名，并由第二份文件提供支持，该文件应包含：

- The client's full name, and
客户的全名，以及
- Their residential address
他们的住址

13. EVIDENCE OF ADDRESS

地址证明

- Current bank statements, or credit/debit card statements, issued by a regulated financial sector firm (not less than 3 months old)
由受监管的金融业公司签发的往来账户银行对账单或信用卡/借记卡对帐单（于3个月内发出的帐单）
- Utility bills (not including mobile phone bills, not less than 3 months old)
水电费单（但并非流动电话费，及于3个月内发出的帐单）

For high risk products, in addition to obtaining the standard information detailed above, the following know your client information should be obtained and recorded:

对于增加风险级别的产品，除了获得上述的标准信息外，亦需要记录以下了解您的客户(kyc)资讯：

- Employment and income details
就业和收入明细
- Source of wealth (i.e. source of the funds being used in the transaction)
财富来源（即交易中使用的资金来源）

14. MONITORING AND REPORTING

监控和报告

Transaction based monitoring will occur within the appropriate business units of PGM. Monitoring of specific transactions will include but is not limited to transactions aggregating US\$5,000 or more and those with respect to which PGM has a reason to suspect suspicious activity. All reports will be documented.

PGM会在适当的业务部门内进行基于交易的监控。对特定交易的监控包括但不限于总额在5,000美元或以上的交易以及PGM有理由怀疑可疑运作的交易。所有报告都会被记录在案。

15. SUSPICIOUS ACTIVITY

可疑运作

There are signs of suspicious activity that suggest money laundering. These are commonly referred to as "red flags". If a red flag is detected, additional due diligence will be performed before proceeding with the transaction. If a reasonable explanation is not determined, the suspicious activity shall be reported to the MLRO.

有一些可疑运作会反映洗钱活动的征兆。这些通常被称为“红旗”。如果检测到红旗，在进行交易之前，将会进行额外的尽职调查。如果没有合理的解释，则应将可疑活动报告给反洗钱合规委员会。

Examples of red flags are:

红旗的示例包括：

- The client exhibits unusual concern regarding the Company's compliance with government reporting requirements and the firm's AML policies, particularly with respect to his or her identity, type of business and assets, or is reluctant or refuses to reveal any information concerning business activities, or furnishes unusual or suspect identification or business documents.
客户对于公司遵守政府上报要求和公司的反洗钱政策，特别是在其身份，业务类型和资产方面，表现出异常的担忧，或是不愿意或拒绝透露任何与其业务运营有关的资讯，或提供异常的资讯或可疑的身份证件或商业文件。
- The client wishes to engage in transactions that lack business sense or apparent investment strategy, or are inconsistent with the client's stated business strategy.
客户希望从事缺乏商业意识的交易或缺乏明显的投资策略，或进行与客户陈述的业务策略不一致的交易。
- The information provided by the client that identifies a legitimate source of funds is false, misleading, or substantially incorrect.
客户提供显示有关资金来源合法的资讯是虚假，误导性或实质上不正确的。
- Upon request, the client refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
在公司要求下，客户拒绝识别或未能提供其资金和其他资产的任何合法来源。
- The client (or a person publicly associated with the client) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
客户（或公开与客户有联系的人）的背景有问题，或新闻报道其可能违反了刑事，民事或法规规定。
- The client exhibits a lack of concern regarding risks, commissions, or other transaction costs.
客户表现出对风险，佣金或其他交易成本毫不担心。
- The client appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.
客户似乎是未公开委托人的代理人，但于缺乏正当商业理由的情况下拒绝或不愿提供有关委托人或实体的资讯或以其他方

式回避。

- . The client has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.
客户难以描述其业务性质，或者缺乏对其行业应有的一般知识。
- . The client attempts to make frequent or large deposits of currency, insists on dealing only in cash equivalents, or asks for exemptions from the Company's policies relating to the deposit of cash and cash equivalents.
客户尝试定期或大量存入货币，或坚持只作现金等价物交易，或要求公司豁免有关现金和现金等价物存放等公司政策的要求。
- . For no apparent reason, the client has multiple accounts under a single name or multiple names, with a large number of inter-account or third-party transfers.
没有明显的原因下，客户拥有一个或多个名称的多个帐户，并有大量的帐户间或第三方转账。
- . The client's account has unexplained or sudden extensive activity, especially in accounts that had little or no previous activity.
客户的帐户有无法解释的或突然有大量的活动，尤其是在先前很少或没有活动的帐户中。
- . The client's account has a large number of wire transfers to unrelated third parties inconsistent with the client's legitimate business purpose.
客户的帐户有大量电汇到无关的第三方，与客户的合法商业用途相矛盾。
- . The client's account has wire transfers that have no apparent business purpose to or from a country identified as money laundering risk or a bank secrecy haven.
客户的帐户中有一些电汇往返至可以将资金划入洗钱风险或银行保密天堂的国家，而这些电汇并没有明显的商业用途。
- . The client's account indicates large or frequent wire transfers, immediately withdrawn by check or debit card without any apparent business purpose.
客户的帐户显示大量或频繁的电汇，并随即通过支票或借记卡提取，而没有任何明显的商业用途。
- . The client makes a funds deposit followed by an immediate request that the money be wired out or transferred to a third party, or to another firm, without any apparent business purpose.
客户先存入一笔资金，然后立即要求将资金汇出或转给第三方或另一家公司，而没有任何明显的商业用途。
- . The client makes a funds deposit for the purpose of purchasing a long-term investment followed shortly thereafter by a request to liquidate the position and transfer of the proceeds out of the account.
客户存入一笔资金，用于购买长期投资，随后不久便要求平仓并将收益转出帐户。
- . The client requests that a transaction be processed in such a manner to avoid the Company's normal documentation requirements.
客户要求以避免公司正常文档记录要求的方式处理交易。

16. KNOW YOUR CLIENT – THE BASIS FOR RECOGNISING SUSPICIONS

了解您的客户-识别可疑交易的基础

A suspicious transaction will often be one which is inconsistent with a client's known, legitimate business or personal activities or with the normal business for that type of client. Therefore, the first key to recognition is knowing enough about the client's business to recognise that a transaction, or series of transactions, is suspicious. 可疑交易通常是与客户的已知，合法业务或个人活动或与该类型客户的正常业务不一致的交易。因此，识别可疑交易的第一个关键是对客户的业务有足够的了解，以识别单一或一系列不寻常的交易。

Questions you must consider when determining whether an established client's transaction might be suspicious are:

在确定已建立的客户的交易是否可疑时必须考虑的问题如下：

- . Is the size of the transaction consistent with the normal activities of the client?
交易规模是否与客户的正常运作一致？
- . Is the transaction rational in the context of the client's business or personal activities?
在客户的企业或个人的背景下，该交易是否合理？
- . Has the pattern of transactions conducted by the client changed?
客户进行的交易模式是否有改变？

17. SUSPICIOUS SCENARIOS

可疑的情况

Issues which should lead you to have cause for suspicion would include:

应该引起您怀疑的问题事项包括：

- . Clients who are reluctant to provide proof of identity;
不愿提供身份证明的客户;
- . Clients who place undue reliance on an introducer (they may be hiding behind the introducer to avoid giving you a true picture of their identity or business);
过度依赖介绍人的客户（他们可能隐藏在介绍人后面，以避免向您提供真实的身份或业务情况）；
- . Requests for cash related business, for example questions about whether investments can be made in cash, suggestions that funds might be available in cash for investment;
要求进行现金相关业务，例如询问有关是否可以现金进行投资的问题，建议投资的资金有可能以现金呈现；
- . Where the source of funds for investment is unclear;
投资资金来源不明确；
- . Where the magnitude of the available funds appears inconsistent with the client's other circumstances (i.e. the source of wealth is unclear). Examples might be students or young people with large amounts to invest;
可用资金的规模与客户的其他情况不一致（即财富来源尚不明确）。例如，学生或年轻人有大量资金投资；
- . Where the transaction doesn't appear rational in the context of the client's business or personal activities. Particular care should be taken in this area if the client changes their method of dealing with you without reasonable explanation;
如果交易在客户的业务或个人活动中显得不合理，如果客户在没有合理解释的情况下改变了与您交往的方式，则您应对这方面特别小心；
- . Where the pattern of transactions changes;
交易方式产生转变；
- . Where a client who is undertaking transactions that are international in nature does not appear to have any good reason to be conducting business with the countries involved (e.g. why do they hold monies in the particular country that the funds are going to or from? Do their circumstances suggest that it would be reasonable for them to hold funds in such countries?);
进行国际性质交易的客户似乎没有充分的理由与所涉国家开展业务（例如，为什么他们在资金将流入或流出的特定国家/地区持有资金？他们在这些国家持有资金是否合理？）；
- . Clients who are unwilling to provide you with normal personal or financial information, for no apparent or rational reason. (Care should be taken not to include all distance relationships as suspicious, because most will be for genuine reasons. Suspicions will ordinarily be based upon cumulative as opposed to stand alone issues)
没有明显或理性原因不愿向您提供正常个人或财务信息的客户。（应注意不要将所有疏远的关系都视为可疑，因为大多数是出于真正的原因。一般怀疑是基于累积而非独立问题）

A money launderer is likely to provide persuasive arguments about the reasons for their transactions. Those should be questioned to decide whether a transaction is suspicious.

洗钱者可能会就其交易原因提供有说服力的论据。应该对那些人提出质疑，以决定交易是否可疑。

18. REPORTING A SUSPICION

上报可疑的情况

Where, for whatever reason, we suspect that a client, or anybody for whom they are acting, may be undertaking (or attempting to undertake) a transaction involving the proceeds of any crime it must be reported as soon as practicably possible and in writing.

无论出于何种原因，我们怀疑客户或他们所代表的任何人可能正在（或试图进行）涉及任何犯罪收益的交易时，都必须在切实可行的范围内尽快进行书面报告。

Internal reports must be made regardless of whether any business was, or is intended to be, actually conducted. 无论是否曾经或打算进行任何业务，都必须撰写内部报告。

19. INVESTIGATION

调查

Upon notification to the MLRO an investigation will be commenced to determine if a report should be made to the appropriate law enforcement or regulatory agencies. The investigation will include, but not necessarily be limited to, review of all available information, such as payment histories, birth dates, and address. If the results of the investigation warrant, the MLRO will file the SAR with the appropriate law enforcement or regulatory agency.

接到反洗钱合规委员会的通知后，将开始调查以确定是否应向适当的执法或监管机构进行举报。调查将包括但不限于对所有可用信息的审查，例如付款历史，出生日期和地址。如果调查结果有必要，则将向反洗钱合规委员会建议将SAR提交给适当的执法或

监管机构。反洗钱合规委员会负责通知或向执法或监管机构的备案。

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. Under no circumstances shall any employee or appointed agent disclose or discuss any AML concern, investigation, notice or SAR filing with the person or persons subject of such, or any other person, including members of the officer's, employee's or appointed agent's family.

除有合理需要知道的人员外，调查结果不会与其他人透露或讨论。在任何情况下，任何职员，或指定代理人均不得与该被调查人或被调查主体或任何其他人员（包括职员，或指定代理人的家庭成员）披露或讨论任何反洗钱问题，调查，通知或SAR申报。

20. FREEZING OF ACCOUNTS

冻结账户

Where we receive a court order to freeze an account, we will do so promptly.

如果我们知道某个帐户中的资金来自犯罪活动，或者它们来自欺诈性指示，则必须冻结该帐户。如果认为帐户持有人可能参与了所举报的欺诈活动，则可能需要冻结该帐户。