
**ANTI-MONEY
LAUNDERING
OPERATING MANUAL**

ASIANLIFE & GENERAL
ASSURANCE CORP.

CHAPTER 1 INTRODUCTION

Section 1.1. Pursuant to SEC CIRCULAR No. 12, Series of 2004 of the Securities and Exchange Commission (SEC) and Circular Letter No. 32-2006 issued by the Insurance Commission, **ASIANLIFE & GENERAL ASSURANCE CORP** as a member of the ATR KimEng Group of Companies and as a regulated intermediary, hereby submits this updated ANTI-MONEY LAUNDERING OPERATING MANUAL based on the revised guidelines provided therein.

Section 1.2. Except as otherwise defined herein, all terms used shall have the same meaning as those terms are defined in the Anti-Money Laundering Act (AMLA) of 2001, Republic Act No. 9160, as amended, hereinafter referred to as the “Act”;

Section 1.3. The following definitions shall apply to the foregoing:

- a. “Act”** shall refer to Republic Act 9160 (as amended by Republic Act No. 9194) entitled, “An Act Defining the Crime of Money-Laundering, Providing Penalties Therefor for Other Purposes:
- b. “Covered Institutions”** – shall be deemed to refer to all entities, persons, individuals, regulated and supervised by the Insurance Commission (IC) under the Insurance Code as well as Republic Act No. 9160 as amended, and shall include the following:
 - b.1. All Life Insurance Companies doing business in the Philippines;
 - b.2. All Non-Life Insurance Companies doing business in the Philippines;
 - b.3. Insurance Intermediaries, whether general agents, ordinary agents, insurance or re-insurance brokers;
 - b.4. Professional Reinsurer;

- b.5. Holding Companies;
- b.6. Mutual Benefit Association;
- b.7. Trust for Charitable Uses; and,
- b.8. All other individuals and entities supervised and/or regulated by the Insurance Commission.

The term Covered Institution in this manual shall be used interchangeably with Insurance Institution.

- c. **“Beneficial Owner”** – applies to the owner/controller of the policyholder as well as to the beneficiary to the contract.
- d. **“Transaction”** – refers to inquiries and application for an insurance policy, premium payments, requests for changes in benefits, beneficiaries, duration, etc.

It is understood that the provisions of the Act and its Revised implementing rules and regulations shall apply in all other cases not covered by this revised operating manual.

Section 1.4. The following definitions shall apply to the foregoing as:

CHAPTER 2 DESCRIPTION OF MONEY LAUNDERING

Section 2.1. Money Laundering is a process intended to mask the benefits derived from serious offenses or criminal conduct as described under the Anti-Money Laundering Act, so that they appear to have originated from a legitimate source. Specifically, it covers all procedures to change, obscure or conceal the beneficial ownership or audit trail of illegally obtained money or valuables so that it appears to have originated from a legitimate source.

Money laundering is also used to hide the link between those who finance terrorism and those who commit terrorist acts.

Financing of terrorism can be defined as the willful provision or collection, by any means, directly or indirectly, of funds with the intention that the funds should be used, or in the knowledge that they are to be used, to facilitate or carry out terrorist acts. Terrorism can be funded from legitimate income.

Section 2.2. Generally, the process of money laundering comprises three stages, during which there may be numerous transactions that could alert AsianLife & General Assurance Corp. to the money laundering activity:

- (a) **Placement** - the physical disposal of cash proceeds derived from illegal activity. The aim is to remove cash from the location of acquisition to avoid detection.
- (b) **Layering** - separating illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity.

The business of insurance is most likely to be used at the second stage of money laundering, the layering process, as they provide a potential avenue which may allow a dramatic alteration of the form of funds – from cash on hand to cash in bank, money in whatever form to an entirely different asset such as securities, investment contracts, pension plans, insurance policies, stock certificates, pre-need plans, bearer and other negotiable instruments.

Money laundering and the financing of terrorism using reinsurance could occur either by establishing fictitious (re)insurance companies or reinsurance intermediaries, fronting arrangements and captives, or by the misuse of normal reinsurance transactions.

- (c) **Integration** - the provision of apparent legitimacy to criminally derived wealth. If the layering process has succeeded, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter the financial system appearing to be normal business funds. It is the final stage and the process at which the money is integrated into the legitimate economic and financial systems and is assimilated with all other assets in the system. Integration of laundered money into the

economy is accomplished by making it appear to have been legally earned. Thus, exceedingly difficult to distinguish between legal and illegal wealth.

Insurance policies, particularly life insurance contracts, are treated not only as protection and savings instruments, but also as investment contracts and as such, insurance transactions incorporate added attraction to the launderer in that the alternative asset is normally highly liquid. The ability to liquidate investment portfolios containing both lawful and illicit proceeds, while concealing the criminal sources of the latter, combines with the huge variety of investments and insurance products available, and the ease of transfer between them, offers the sophisticated criminal launderer an ideal route to effective integration into the legitimate economy. Due diligence must therefore be exercised to prevent the use of insurance institutions as instruments of money laundering.

Section 2.3 Due diligence must, therefore, be exercised to prevent the use of the Company as instrument for money laundering. AsianLife & General Assurance Corp. implements the following procedures to identify when it is being requested to “launder money”.

- Investment Advisor/Agent/Consultant should take all reasonable steps (exercise “due diligence “)

To enable them to establish, to their satisfaction, the true and full identity of each client, and of each client’s source of wealth, financial situation and investment, objectives at the time the relationship is established (See SRC Rule 52-1-6). Whenever possible, the prospective customer should be interviewed personally. As required by SRC Rules 30.2-1 and 52.1-6, salesmen are required to “know” at all times the identity of the persons with whom they are dealing with.

- Any suspicion of such transactions should be communicated to the Compliance Officer. The following are some examples of suspicious transactions:
 - Large or unusual settlements of transactions in cash or bearer form;

- Buying and selling of securities with no discernible purpose or in circumstances which appear unusual;
 - A number of transactions by the counterparty or in small amounts relating to the same security, each purchased for cash and then sold in one transaction, the proceeds being credited to an account different from the original account;
 - Any transaction where the nature, size or frequency appears unusual;
 - Instructions to credit sales proceeds to an account different from that of the original source account or to a third party;
 - Investors introduced by an overseas person, either of which are based in countries where production of drugs, drug trafficking, terrorism, or money laundering operations maybe present or prevalent;
 - The use by a client of the SD/SB firm as a place to hold funds that are not being used to trade in securities;
 - The entry of matching buys and sells in particular securities (wash sales) creating the illusion of trading. Such wash trading does not result in a bona fide market position and might provide a cover for a money launderer;
 - Wash trading through multiple accounts may be used to transfer funds through accounts by generating offsetting losses and profits in different accounts. Transfer of positions between accounts that do not appear to be commonly controlled could also be a warning sign.
- If there are any suspicions about the activities (dealings, money transfers etc.) of an existing or potential customer, they should be reported immediately to the Compliance Officer. The procedures for reporting to the Compliance Officer are detailed in Section 8.1 of this Manual.
 - Employees are prohibited from disclosing to a client or any other person that information has been passed to the Compliance Officer, management or the regulatory authorities of anti-money laundering council.
 - To ensure compliance with this requirement, all personnel will be required to sign a statement on breach of confidentiality provision of the AMLA. A copy of this signed statement will be filed together with the personnel 201 file.

Section 2.4. **Vulnerabilities in Insurance.** Life and Non-life insurance can be sued in different ways by money launders and terrorist financiers.

Insurance Institution therefore should take adequate measures to deter, detect and report money laundering and the financing of terrorism.

The type of life insurance contracts that are vulnerable as vehicle for laundering money or terrorist financing are products, which include: unit-linked single premium contracts, purchase fixed and variable annuities, single provision life insurance policies that store cash value and (secondhand) endowment policies. Non-life money laundering or terrorist financing can be seen through inflated or legally bogus claims and through the use of reinsurance. An insurance policy might be used as collateral to purchase other financial instruments. These investments in themselves may be merely one part of a sophisticated web of complex transactions with their origins in the financial services sector.

CHAPTER 3

BASIC PRINCIPLES AND POLICIES TO COMBAT MONEY LAUNDERING

Section 3.1 The SEC and the IC seek to combat money laundering by requiring every Stock Broker/Dealer to apply the following principles:

- i. *Know the customer / Client:* AsianLife & General Assurance corp. before opening an account shall see to it that satisfactory and competent evidence is properly obtained on the identity of their customers and effective procedures have been applied for such verification especially on new customers. AsianLife & General Assurance Corp. keeps a Customer Account Information Form (CAIF) for its customers; in accordance with Rule 52.1 (6) Customer Account Information Rule of the amended implementing rules of the Securities Regulation Code (SRC) as well as the Insurance Commission.
- ii. *Compliance with laws:* AsianLife & General Assurance Corp. ensure that laws and regulations especially those covered under the SRC and the Anti-Money Laundering Act of 2001 as

amended, are adhered to under a business environment of high ethical standards and no service shall be provided to any client where there is good reason that money laundering activities could be involved.

- iii. *Co-operation with law enforcement agencies:* Should there be reasonable grounds for suspecting money laundering, AsianLife & General Assurance Corp. shall fully cooperate with proper law enforcement agencies within the legal constraints relating to customer confidentiality. For purposes of the Anti-Money Laundering Act of 2001, as amended, disclosure of information regarding suspicious transactions and covered transactions shall be made to Executive Director, Anti-Money Laundering Council, 5th Floor, EDPC Bldg., Bangko Sentral ng Pilipinas.
- iv. *Dissemination of Policies and procedures:* Policies and procedures to prevent and detect possible money laundering activities are properly disseminated to the officers and staff of AsianLife & General Assurance Corp., which include its Advisor/Agent/Consultant, and Compliance Officer registered with the SEC and/or the IC.

CHAPTER 4 CUSTOMER IDENTIFICATION

Section 4.1.A. GENERAL: Aside from the implementation of the Customer Account Information Rule (SRC Rule 52.1-6) which requires brokers and dealers and insurance brokers to get specific personal and business information from clients, additional efforts should be made to obtain satisfactory evidence of the true and full identity of clients through presentation of documents such as, but not limited to:

- a. identity documents, such as passports, birth certificates, driver's licenses, employment identification cards, and other similar identity documents, which are verifiable from the institution issuing the same;

The identifying documents should provide evidence of true name or names used, permanent address, date of

birth, nationality, and office address. They should include at least one bearing a photograph and be pre-signed. The identifying documents that are considered most reliable are official identity cards and passports. While identification documents that are easily obtained in any name, e.g., medical cards, credit cards and student identification cards may be used, they should not be accepted as the sole means of identification.

While official identity cards and passports are the most reliable among these documents, salesmen and officers accepting new accounts/clients (particularly walk-in or referred) should scrutinize these documents to ensure they are in fact genuine. If in doubt, immediately advise the Compliance Officer or Operations Head who will coordinate with the issuing agency/(ies) to determine and validate genuineness of the of the document.

As a rule, salesmen should require new applicant to present to him the original documents and after carefully scrutinizing the originals, sign the photocopy to indicate that he has seen the original.

- b. incorporation and partnership papers, for corporate accounts. These documents should be certified as true copies from the issuing government agency.
- c. special authorizations for representatives, which must be duly notarized.
- d. other pertinent and reasonable documents as may be deemed necessary under the prevailing circumstances.

Section 4.1.B. PERSONAL ACCOUNTS: AsianLife & General Assurance Corp. shall obtain for each personal/individual account the following information:

- customer name and/or names used;
- residence address; telephone number
- business address; telephone number
- date and place of birth

- whether customer is an institutional customer;
- nationality;
- signature of the Advisor/Agent/Consultant introducing the account and signature of two (2) members of Management Committee; and,
- nature of work, name of employer or nature of self-employment or business;

For each account other than an institutional account, AsianLife & General Assurance Corp. shall also make reasonable effort, prior to the settlement of the initial transaction in the account the following information to the extent it is applicable to the account;

- Customer's tax identification numbers, Social Security number or Government Service and Insurance System number;
- Occupation of customer, name and address and telephone number of the employer;
- Annual income, Assets or networth.
- Whether the customer is associated with another SB/SD (e.g. officer, director, Advisor/Agent/Consultant, shareholder)
- Whether the customer is an officer or director (insider) of a company listed on the exchange;
- The customer's investment objective and other related information concerning the customer's financial situation and needs;
- Account type; if cash,
- specimen signature;

Approval of the Account or "new client" is subject to the following terms and conditions:

- The Customer Account Information Form must be fully accomplished;
- Clear photocopy of a valid ID with photo of the client is submitted (any government issued ID i.e. passport, driver's license, PRC)
- Client is in good financial standing;

- Client was highly recommended by Advisor/Agent/Consultant; and
- AsianLife & General Assurance Corp. have conducted sufficient background checking.

Section 4.1.C. CORPORATIONS OR PARTNERSHIP: - Before establishing a business relationship, a company search and/or other commercial inquiries shall be made to ensure that the corporate/other business applicant has not been, or is not in the process of being dissolved, struck off, wound-up or terminated. In the event of doubt as to the identity of the company or its directors, or the business or its partners, a search or inquiry with the SEC or the IC or the relevant Supervising Authority/Regulatory Agency shall be made.

The following relevant documents shall be obtained in respect of corporate/other business applicants, which are Regulated in the Philippines:

- Copies of the Certificate of Registration, including Articles of Incorporation or Certificate of Partnership, as appropriate, copies of the By-Laws and Latest General Information Sheet, which lists the names of directors/partners and principal stockholders, and secondary licenses.

The originals or certified copies of any or all of the foregoing documents, where required, should be produced and submitted for verification.

- Sworn statement as to existence or non-existence of beneficial owners.
- Appropriate Board of Directors' resolutions and signed application forms or account opening, identifying the authorized signatories or principal officers of the corporation authorized to trade and their authorities and specimen signatures;
- Board Resolution authorizing the corporation to open the account with a stock/insurance brokerage firm;
- Latest Audited Financial Statements;

- Where necessary, AsianLife & General Assurance Corp. may also require additional information about the nature of the business of clients, copies of identification documents of shareholders, directors, officers and all authorized signatories;

Section 4.2. Clients who fail to provide evidence of their full identity shall be made aware that business transaction with them cannot be conducted as a policy of AsianLife & General Assurance Corp.

Section 4.3. As per policy of AsianLife & General Assurance Corp., clients upon request for further verification, should be able to present original copies of documents aside from photocopies of identifications being presented/submitted to the staff responsible for safekeeping of documents. If originals are not presented ensure that photocopies are certified true copies and the Investment Advisor/Agent/Consultant accepting the account has signed/authenticated it indicating he has seen the original of the identification card and other documents presented. The Investment Advisor/Agent/Consultant accepting the account should bear in mind that he is equally accountable by signing/authenticating that he has seen the original documents.

Section 4.4. VERIFICATION WITHOUT FACE-TO-FACE CONTACT

- a.) Whenever possible, AsianLife & General Assurance corp. request that prospective clients should be interviewed personally by the Advisor/Agent/Consultant;
- b.) There may be cases where clients can open an account without going to the office, but are well known to the Advisor/Agent/Consultant and he meets with them outside the office. In such cases, the accepting Investment Advisor/Agent/Consultant should sign the CAIF with the indication that he has conducted a face-to-face meeting with the client.
- c.) Customer identification procedures for non-face-to face verification is as the same as those for face-to-face verification. AsianLife & General Assurance Corp. shall inform such clients that same measures shall apply to them.
- d.) The following are some counter checks being done by AsianLife & General Assurance Corp. to verify identity of clients without face to face contact.

- Telephone contact of the applicant at an independently verifiable home or business number;
- With the consent of the applicant, AsianLife & General Assurance Corp. shall confirm with his employer, his employment through their personnel department.
- Submission of Income tax return duly stamp by BIR, and also bank statement or any proof of income and;
- Confirmation of address through correspondence or presentation of proof of billing address like Meralco bill, or any utility bill.

Above procedures should be strictly implemented when opening of accounts is coursed via telephone, internet or by mail; especially if the client is just referred by another client or any of the staff. Such requirements should be done preferably prior to executing the initial transaction. If it can not be avoided, ensure that above are conducted prior to the settlement of the client's initial transaction.

For non-residents who seek to procure insurance in the Philippines, whenever applicable, and without face-to-face contact, documents as enumerated above issued by foreign authorities may be submitted, duly authenticated by the Philippine Consulate where such foreign authorities are located.

Section 4.5. AsianLife & General Assurance Corp. always requires its clients to submit information particularly on the source of funds. If the client state that he has a business, always request some proof of the business documents, like SEC registration and by-laws, Business registration. Company search on the SEC website for registered companies is done to ensure that the corporate or other business applicant is an existing business entity.

Section 4.6. Customer identification and information of existing clients should be updated and/or amended at least once every five (5) years. This refers to change of residential or business address, new identification cards, new passport, additional business information, new business investment/venture, and the like. For any change of information before the said period AsianLife &

General Assurance Corp. always request a letter or document pertaining to the changes being made.

Section 4.7. For Non-Philippine residents who want to open accounts without face-to-face contact, documents necessary to verify their identity as enumerated in Section 4.1-B and 4.1-C must be duly authenticated by the Philippine Consulate in the countries where such non-Philippine residents are located.

Section 4.8. Bearing in mind the “Know – Your – Customer” principle, AsianLife & General Assurance Corp. should be in a position of no-doubt or no suspicions exist in our minds that the identities of our clients are questionable after careful evaluation of all identification documents as enumerated in Section 4.1-A are submitted to us and any other means used to come up with a satisfactory evidence on the identity of our clients. This should all the more be very important where the client is not a Filipino and therefore more probing must be made on the purpose of the transaction and the sources of funds especially if it involves a significant amount, except, however, when such client is a long-established and well known customer.

Section 4.9. Once an account is opened for a client, particular care shall be taken in cases where instructions for transactions in behalf of said client is being made by another person or party, such person or party must be formally authorized by the client account to make such transactions in his/her behalf. AsianLife & General Assurance Corp. shall have required the necessary documents such as Special Power of Attorney (SPA) or duly signature-verified authorization given by clients; e.g. authorized to place an order; up to what amount; and authorized to receive invoices and checks.

Section 4.10. AsianLife & General Assurance Corp. shall establish whether the applicant for business relationship is acting on behalf of another person as trustee, nominee or agent. AsianLife & General Assurance Corp. shall obtained authorized evidence of the identity of such agents the same documents needed as enumerated under Section 4.1-B and authorized signatories, and the nature of their trustee or nominee capacity and duties.

Section 4.11. At present AsianLife & General Assurance Corp. does not entertain numbered accounts. But in cases where a potential customer insists for confidentiality reasons, a numbered account may be opened subject to submission of all the required documents which shall be kept separately by the Head of Operations. Opening of a numbered account should be pre-cleared with the Compliance Officer.

Section 4.12. Shell companies are legal entities which have no business substance in their own right but through which financial transactions may be conducted. It is the policy of AsianLife & General Assurance Corp. to be always cautious when dealing with these companies as these are often abused by money launderers. In addition to the requirements under 4.1.C, AsianLife & General Assurance Corp. shall require a Board of Directors' certification as to the purpose(s) of the owners/stockholders in acquiring the shell company. There must be a satisfactory evidence of the identities of the beneficial owners bearing in mind the "Know-Your-Customer" principle.

Section 4.13. As a policy, AsianLife & General Assurance Corp. only allows named account holders to operate the account. Where it may not be avoided, particular care must be taken to ensure that the person giving instructions is authorized to do so by the accountholder. A Special Power of Attorney (SPA) or a signature-verified instruction in writing duly executed by the accountholder authorizing (or naming) a third party to transact in behalf of the accountholder should first be obtained.

Section 4.14. Similarly, as a policy, AsianLife & General Assurance Corp. does not allow named account holders to transact for non-account holders and should therefore exercise special care and vigilance. Where transactions involve significant amounts, the customer should be asked to produce competent evidence of identity including nationality, especially in cases where the client is not a Filipino, the purposes of the transaction, and the sources of the funds.

CHAPTER 5 RECORD KEEPING

Section 5.1. AsianLife & General Assurance Corp. shall prepare and maintain documentation on their customer relationships and transactions such that:

- i. requirements of the Act are fully met;
- ii. any transaction effected via AsianLife & General Assurance Corp. can be reconstructed and from which the Council will

be able to compile an audit trail for suspected money laundering, when such a report is made to it;

- iii. AsianLife & General Assurance Corp. can satisfy within a reasonable time any inquiry or order from the Council as to disclosure of information, including without limitation whether a particular person is the customer or beneficial owner of transactions conducted through the Company.

Section 5.2. The following document retention periods shall be followed:

- i. All documents in opening the accounts of clients and records of all their transactions, especially customer identification records, shall be maintained and safely stored for five (5) years from the dates of transactions.
- ii. With respect to closed accounts, the records on customer identification, account files and business correspondence, shall be preserved and safely stored for at least five (5) years from the dates when they were closed.
- iii. SRC Rules 52.1-(1) (Books and Records Keeping Rule) and SRC Rule 52.1-(2) (Records Retention Rule) of the Amended Implementing Rules and Regulations of the Securities Regulation Code and/or the IC's implementing rules continue to be in full force and effect.

In compliance with SRC Rule 52.1-1, AsianLife & General Assurance Corp. maintains current books and records in its Office of Primary Supervision. Below is the summary of the books and records maintained on a current basis:

- Blotters
 - Cash receipts and disbursement blotter
- General Ledger
 - Journal Vouchers

- Customer Ledgers
 - Official receipts
 - Disbursement vouchers
 - Debit/credit memoranda

- Subsidiary Ledgers
 - Monies borrowed and loaned ledger
- Confirmation invoices
- Trial Balance
- Employment Application (for each Compliance Officer and Investment Advisor/Agent/Consultant)
- Customer Account Information Form
- Personnel files
- Customer Complaint File
- Customer Correspondence

Checking and review of the documents is done by the personnel assigned to verify the accuracy and completeness of the book/record maintained by AsianLife & General Assurance Corp. It is important that any material irregularity or documents lacking are noted and reported for immediate rectification correction.

Any or all of AsianLife & General Assurance Corp. books and records should be immediately available upon request by the SEC and/or IC. Failure to do so shall result in immediate suspension of the firm from the right to engage in the securities business. Such suspension shall continue until such time as the books and records are made available to the requesting regulatory authority and the regulatory authority has satisfied itself that the books and records have not been modified or otherwise changed or altered during the period of suspension.

Section 5.3. Transaction documents may be retained as originals or copies, on microfilm, or in electronic form, provided that such forms are admissible in court, pursuant to the Revised Rules of Court and the E-Commerce Act and its Implementing Rules and Regulations.

Section 5.4. If the records relate to on-going investigations or transactions that have been the subject of a disclosure, they shall be retained beyond the

stipulated retention period until it is confirmed that the case has been closed and terminated.

CHAPTER 6 COVERED AND SUSPICIOUS TRANSACTIONS

Section 6.1. It shall be mandatory that a **Covered Transaction Report (CTR)**, a copy of which is hereto attached as **Annex “A”**, covering single or multiple transactions in five (5) days, in cash or other equivalent monetary instrument, be filed before the Anti-Money Laundering Council, within one (1) banking day where the total amount involved is in excess of P500,000.00, threshold limit provided under Section 3 (b) of R.A. 9160, as amended by RA 9194.

The CTR in AMLA Form requires three (3) signatories from AsianLife & General Assurance Corp., to wit:

- 1.) The staff or officer who entertained or secured the account,
- 2.) the Compliance Officer, and
- 3.) a senior officer not less than the position of the Vice-President.

For online reporting thru electronic mail it's the sole responsibility of the Compliance Officer to keep the report confidential and safe from public exposure.

Section 6.2. As provided in Section 3 (b-1) of the Act, AsianLife & General Assurance Corp. shall file a Suspicious Transaction Report (STR) (Annex “B”) before the Anti-Money Laundering Council, regardless of the amount of the transaction where any of the following circumstances exists:

1. there is no underlying legal or trade obligation, purpose or economic justification;
2. the client is not properly identified;

3. the amount involved is not commensurate with the business or financial capacity of the client;
4. taking into account all known circumstances, it may be perceived that the client's transaction is structured in order to avoid being the subject of reporting requirements under the Act;
5. any circumstance relating to the transaction which is observed to deviate from the profile of the client and/or the client's past transactions with the covered institution;
6. the transaction is in any way related to an unlawful activity or offense under this Act that is about to be, is being or has been committed; or
7. any transaction that is similar or analogous to any of the foregoing.

Section 6.3. A suspicious transaction, as a general principle, relates to any transaction wherein there is a feeling of apprehension or mistrust considering the unusual nature or circumstances of the transaction and the behavioral factors on the persons with whom the transaction is being dealt with and thereby bringing some suspicion that the transaction may be connected with an unlawful activity. A list of examples of suspicious transactions is attached in **Annex "C"** hereof. The list is not exhaustive and it is left to the better judgment of AsianLife & General Assurance Corp. to gauge the nature of each and every transaction that they would be involved in.

SECTION 7 REPORTORIAL REQUIREMENTS

Section 7.1. AsianLife & General Assurance Corp. shall institute a system for the mandatory reporting of covered transactions and suspicious transactions by appointing the Compliance Officer who is registered with the SEC, PSE and/or IC, who shall be responsible for reporting to the Council, after approval by the Board or the President or Chairman. If an urgent disclosure is required when there is an on-going investigation, an initial notification by telephone should be made to the Executive Director, Anti-Money Laundering Council, Bangko Sentral ng Pilipinas.

Section 7.2. Reporting of covered and suspicious transactions must be done by the Compliance Officer within five working days.

Section 7.3. AsianLife & General Assurance Corp. employees, Advisor/Agent/Consultant, Compliance Officer, and/or directors shall not warn their customers when information relating to them is being reported to the council or communicate, directly or indirectly such information to any other person other than the Council. Any violation of this confidentiality provision shall render them liable for criminal, civil and administrative sanctions under the Act.

Section 7.4. AsianLife & General Assurance Corp. shall register or maintain a complete file on all covered and suspicious transactions that have been brought to the attention of the Compliance Officer, including transactions that are not reported to the Council. The register shall contain details of the date on which the report is made, the person who made the report to the Compliance Officer, and information sufficient to identify the relevant papers related to said reports.

The following are the list of files to be maintained

- Order tickets
- Contracts
- Confirmation Invoices
- Official Receipts
- Check Vouchers
- Monthly Statement of Account
- Correspondence
- In/out receipts
- And any other Related Trade reports

CHAPTER 8 INTERNAL CONTROL AND PROCEDURES

Section 8.1. As a general internal control procedure, directors, officers, salespersons and staff of AsianLife & General Assurance Corp. shall report any knowledge or suspicion of money laundering activity to the Compliance Officer, which is the designated reporting officer. This should be formally transmitted to the Compliance Officer either in hard copy report, memoranda or note, or via electronic means (inter-office email). Use of external emails in transmitting the

report is prohibited. Ensure no one else is provided a copy (including blind copies). Failure to comply with such requirement exposes the reporting personnel to breach of confidentiality in violation of the Anti Money Laundering Act and is punishable by fine no less than P500,000 but not more than P1,000,000 or imprisonment of no less than 3 three years but not more than 8 years.

In line with this requirement, all personnel will be required to sign a statement on breach of confidentiality provision of the AMLA. A copy of this signed statement will be filed together with the personnel 201 file.

Section. 8.2. It shall be the duty and responsibility of such reporting officer to evaluate any report in the light of relevant information available to determine whether there is a reasonable ground for a suspicion of money laundering. See Annex C for List of Suspicious Transactions.

Section 8.3. After a thorough evaluation and reasonable belief that there is really a basis for suspicion of money laundering, the Reporting Officer, Compliance Officer shall file the necessary reports promptly to the Council.

Section 8.4. Reporting officer shall maintain a register of all reports made to the Council as well as all reports made by the staff of their firm relative to suspicious transactions, whether or not such were reported to the Council.

CHAPTER 9 COMPLIANCE

Section 9.1 Reporting of Covered and Suspicious transaction must start from the Salesperson, since these are the persons who really know the capacity of its client. The Salesperson after assessment of any Covered transaction shall report to the Reporting Officer (Compliance Officer). The Compliance Officer with the assistance of the senior officers of AsianLife & General Assurance Corp. shall report such covered or suspicious transactions to the council.

Section 9.2. The designated Reporting Officer/ Compliance Officer should be fully knowledgeable on the conduct of business of securities, brokers/dealers. This would ensure that he will be able to impart the compliance procedures to the staff of their firm and be able to impart the Compliance procedures to the staff of the Company and be able to liaison effectively with the Council.

Section 9.3. Notwithstanding the duties of the Compliance Officer as reporting officer, the ultimate responsibility for proper supervision, reporting and compliance with the Anti-Money Laundering Act as amended and its implementing Rules and Regulations, shall rest with AsianLife & General Assurance Corp. and its Board of Directors.

CHAPTER 10 TRAINING OF STAFF

Section 10.1. At present AsianLife & General Assurance Corp. provides the necessary training, orientation to its Salesperson and Compliance Officer. The A/P is responsible in disseminating to the staff the new procedures and guidelines needed by the company in combating money laundering. The board of directors and officers, are provided the necessary training because of our affiliation with an investment house and a listed company. The officers and staff are sent to orientations, training and seminars being offered by the regulatory bodies.

Section 10.2. AsianLife & General Assurance Corp. shall determine the extent of training/orientation of its personnel with the priority being given to the Compliance Officer who would be directly be exposed to situations involving money laundering activities. Scope of training is on the following;

Scope of training:

Provisions of the AMLA and the IRR
The Company's AMLA Manual
The Company's Internal Supervision, Control, and Compliance
Procedures

The Company's Corporate Governance Manual
Updates and changes on the AMLA
Updates and changes on Corporate Governance
Updates and changes on Internal Supervision, Control, and
Compliance Procedures
Updates on BIR Regulations
Updates on PSE/SEC/IC Regulations

Section 10.3. Refresher training or orientations shall be made from time to time to constantly remind key staff of their responsibilities or if there are changes in the laws and rules in money laundering.

ANNEX “A”

COVERED TRANSACTION REPORT (CTR)

REVISED ANTI-MONEY LAUNDERING OPERATING MANUAL

COVERED TRANSACTION REPORT (CTR) <i>(Complete all parts that apply—See instructions)</i>		Sec form No. _____ January 2002
1 Check all box(es) that apply:		
a <input type="checkbox"/> Amends prior report b <input type="checkbox"/> Individual Person c <input type="checkbox"/> Multiple Persons d <input type="checkbox"/> Corporation		
Part I Person(s) Involved in Transaction(s)		
Section A - Individual Person		
2 Individual's last name	3 First Name	4 Middle Name
5 Doing Business As	6 SSS, GSIS, TIN No.	7 Date of Birth
8 Address		9 Tel. Nos./Fax Nos.
10 Occupation/Business		11 Tel. Nos./Fax Nos.
12 Describe Method to Verify Identity		
a <input type="checkbox"/> Driver's License c <input type="checkbox"/> Alien Registration b <input type="checkbox"/> Passport d <input type="checkbox"/> Others _____		
Issuing Authority _____		Number _____
Date Issued _____		Date of Expiry _____
Section B - Multiple Persons		
2 Last name	3 First Name	4 Middle Name
a	a.1	a.2
b	b.1	b.2
c	c.1	c.2
5 Doing Business As	6 SSS, GSIS, TIN No.	7 Date of Birth
a	a.1	a.2
b	b.1	b.2
c	c.1	c.2
8 Addresses		9 Tel. Nos./Fax Nos.
a	a.1	a.2
b	b.1	b.2
c	c.1	c.2
10 Occupation/Business		11 Tel. Nos./Fax Nos.
12 Describe Methods to Verify Identity		
First Individual		

REVISED ANTI-MONEY LAUNDERING OPERATING MANUAL

<p>a <input type="checkbox"/> Driver's License b <input type="checkbox"/> Passport</p>	<p>c <input type="checkbox"/> Alien Registration d <input type="checkbox"/> Others _____</p>
Issuing Authority _____	Number _____
Date Issued _____	Date of Expiry _____
Second Individual	
<p>a <input type="checkbox"/> Driver's License b <input type="checkbox"/> Passport</p>	<p>c <input type="checkbox"/> Alien Registration d <input type="checkbox"/> Others _____</p>
Issuing Authority _____	Number _____
Date Issued _____	Date of Expiry _____
Third Individual	
<p>a <input type="checkbox"/> Driver's License b <input type="checkbox"/> Passport</p>	<p>c <input type="checkbox"/> Alien Registration d <input type="checkbox"/> Others _____</p>
Issuing Authority _____	Number _____
Date Issued _____	Date of Expiry _____

Section C : Corporation		
13 Regulated Name	14 Registration No.	15 Date of registration
16 Address	17 Tel. Nos./Fax Nos.	
18 Nature of Business	19 Tel. Nos./Fax Nos.	
20 Describe Method to Verify Legal Existence		
<p>a <input type="checkbox"/> Certificate of registration b <input type="checkbox"/> Articles of Incorporation/By-Laws</p>	<p>c <input type="checkbox"/> City/Municipal permits d <input type="checkbox"/> Others _____</p>	
Part II Amount and Type of Transaction (s) Check all boxes that apply.		
21 Amount of Cash _____	22 Date(s) of Transaction (s)	
<p>a <input type="checkbox"/> Philippine Peso b <input type="checkbox"/> US Dollar c <input type="checkbox"/> Others _____</p>		

REVISED ANTI-MONEY LAUNDERING OPERATING MANUAL

23 Account Numbers Involved and Affected	
24 Nature of Transaction: Describe. Use additional Sheets, if necessary.	
PART III Covered Institution Where Transaction(s) Take Place	
25 Name of Covered Institution	26 Nature of Business
27 Address	28 Tel. Nos./Fax Nos.
29 Name and Title of Person Who Made the Transaction	30 Date When Reported
31 Name and Title of Person Preparing this Report	32 Date This Report was Signed
33 Signature of Person Who Made the Transaction	34 Signature of Preparer
35 Name/Title of Person Approving this Report	36 Signature of Person Approving this Report
37 Copy of Authorization from Covered Institution of Persons Making, Preparing and Approving This Report	
a <input type="checkbox"/> Attached b <input type="checkbox"/> Not Attached. Reasons _____	

General Instructions

Who Must File.—Each covered institution must file SEC Form No. _____ (CTR) for each transaction by, through, or to the covered institution which involves a transaction in Philippine currency or its equivalent in foreign currency of more than Php500,000.00. Multiple transactions must be treated as a single transaction if the covered institution has knowledge that (1) they are by or on behalf of the same person, and (2) they result in currency received (Cash In) or currency disbursed (Cash Out) by the covered institution totaling more than Php500,000.00 in a series of transactions. A business day is a calendar day.

Identification Requirements.— **This is important!** All individuals conducting a reportable transaction(s) for themselves or for another person must be identified by means of an official document(s) from the covered institution as the person/s authorized to make such a report.

In completing the CTR, the covered institution must indicate on the form the method, type, and number of the identification of the account holder or customer used in the transaction. Statements such as “known customer” or “signature card on file” are not sufficient for form completion.

When and Where To File.—File this CTR within five (5) days from which the transaction occurred to:

**THE EXECUTIVE DIRECTOR
ANTI-MONEY LAUNDERING COUNCIL
BANGKO SENTRAL NG PILIPINAS
ROXAS BOULEVARD
PASAY CITY**

Penalties.—Civil and criminal penalties are provided by the law for failure to file a CTR or to supply information or for filing a false or fraudulent CTR.

Specific Instructions

1. Because of the limited space of the CTR, it may be necessary to submit additional information on attached sheets. Submit this additional information on plain paper attached to the CTR. Be sure to put the covered institution’s, individual’s or organization’s name and identifying number (e.g., items 2, 3, 4, and 6 of the CTR) on any additional sheets so that if it becomes separated, it may be associated with the CTR.

2. Amounts may be aggregated. The threshold limit for mandatory filing of a covered transaction report an amount in excess of Php500,000.00. This covers the following transactions:

- a. a single, series or combination of transactions a total amount in excess of Php500,000.00 or an equivalent in foreign currency based on the prevailing exchange rate where the client is not properly identified and/or the amount is not commensurate with his business or financial capacity, or is without any underlying legal or trade obligation, purpose, origin or economic justification.
- b. A single, series or combination or pattern of unusually large and complex transactions in excess of Php500,000.00 or an equivalent in foreign currency based on the prevailing

exchange rate, especially cash deposits and investments having no credible purpose or origin, underlying trade obligation or contract.

3. Enter the full address of the covered institution where the transaction occurred. If there are multiple transactions, provide information on the office or branch where any one of the transactions has occurred.

4. The CTR shall be signed by the employee(s) who dealt directly with customer in the transaction and who made the initial internal report within the covered institution, the Compliance Officer of the covered institution, who made the necessary evaluation of the transaction and a senior official of the covered institution with a rank not lower than senior vice-president, who approved the filing of the CTR.

ANNEX “B”

SUSPICIOUS TRANSACTION REPORT (STR)

REVISED ANTI-MONEY LAUNDERING OPERATING MANUAL

Suspicious Transaction Report		SEC FORM NO. _____ January 2002	
1 Check box below only if correcting a prior report. <input type="checkbox"/> Corrects Prior Report (see Part V under How to Make a Report)			
PART I		Reporting Covered Institution Information	
2 Name of Covered Institution			
4 Address of Covered Institution		5 Tel. Nos. /Fax Nos.	
6 Address of Branch Office(s) where transaction occurred		7 If institution closed, date closed ____/____/____ MM DD YYYY	
8 Account number(s) affected	Date Opened	Closed?	Date Opened Closed?
a _____	_____	<input type="checkbox"/> Yes	c _____ <input type="checkbox"/> Yes
b _____	_____	<input type="checkbox"/> No	d _____ <input type="checkbox"/> No
9. Nature of Transaction(s)/Account(s)			
PART 2		Suspect Information	
10 Last Name or Name of Entity		11 First Name	12 Middle
13 Address		14 SSN, GSIS or TIN	
15 Date of Birth ____/____/____ MM DD YYYY	16 Phone Number – Residence	167 Phone Number - Work	
18 Occupation/Type of Business		19 Admission/Confession? a <input type="checkbox"/> Yes b <input type="checkbox"/> No	

REVISED ANTI-MONEY LAUNDERING OPERATING MANUAL

<p>20 Forms of Identification for Suspect:</p> <p>a <input type="checkbox"/> Driver' s License b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien Registration d <input type="checkbox"/> Other _____</p> <p>Number _____ Issuing Authority _____</p> <p>Date Issued _____ Date Expires _____</p>	
<p>21 Relationship to Covered Institution:</p> <p>a <input type="checkbox"/> Accountant d <input type="checkbox"/> Attorney g <input type="checkbox"/> Customer j <input type="checkbox"/> Officer</p> <p>b <input type="checkbox"/> Agent e <input type="checkbox"/> Borrower h <input type="checkbox"/> Director k <input type="checkbox"/> Shareholder</p> <p>c <input type="checkbox"/> Appraiser f <input type="checkbox"/> Broker i <input type="checkbox"/> Employee l <input type="checkbox"/> Other</p> <p style="text-align: right;">_____</p>	
<p>22 Is the relationship an insider relationship? a <input type="checkbox"/> Yes b <input type="checkbox"/> No</p> <p>If Yes specify: c <input type="checkbox"/> Still employed e <input type="checkbox"/> Terminated</p> <p> d <input type="checkbox"/> Suspended f <input type="checkbox"/> Resigned</p>	<p>22 Date of Suspension, Termination, Resignation</p> <p style="text-align: center;">____ / ____ / ____</p> <p style="text-align: center;">MM DD YYYY</p>

PART III Suspicious Transaction Information	
23 Date or date range of suspicious transaction From <u> </u> / <u> </u> / <u> </u> To <u> </u> / <u> </u> / <u> </u> <small>MM DD YYYY MM DD YYYY</small>	24 Total amount involved in known or suspicious transaction Peso _____ Dollar _____ Other Currency _____
25 Basis of Suspicion: Check any of the listed Predicate Crimes <ul style="list-style-type: none"> a. <input type="checkbox"/> Kidnapping for ransom b. <input type="checkbox"/> Dangerous Drugs Act (Secs. 3,4,5,7,8,,9 of Art. 2) c. <input type="checkbox"/> Anti-Graft and Corrupt Practices Act (RA 3019, Secs. 3 (b,c,e,g,h, i) d. <input type="checkbox"/> Plunder (RA 7080) e. <input type="checkbox"/> Robbery and extortion (Revised Penal Code, Arts. 294, 295, 296, 299, 300, 301, 302) f. <input type="checkbox"/> Jueteng and masiao (Illegal Gambling PD 1602) g. <input type="checkbox"/> Piracy in the high seas h. <input type="checkbox"/> Qualified theft (RPC Art. 310) i. <input type="checkbox"/> Swindling (Estafa RPC Art. 315) j. <input type="checkbox"/> Smuggling (RA 455 and 1937) k. <input type="checkbox"/> E-Commerce (RA 8792) l. <input type="checkbox"/> Hijacking (RA 6235) m. <input type="checkbox"/> Destructive arson and murder, those perpetrated by terrorists against non-combatant persons and similar targets n. <input type="checkbox"/> Fraudulent practices and violations of SRC (RA 8799) o. <input type="checkbox"/> Felonies or offenses of similar nature punishable under penal laws of other countries, specify _____ 	
27 Name of Person (s) Making this report	28 Position in Covered Institution
29 Contact Number	30 Date Prepared
31 Signature of Person/s Making this Report	
32 Name of Person Receiving This Report	33 Position
34 Contact Number	35 Date Received
36 Signature of Person Receiving This Report	

37 Copy of the following documents attached

a Customer Identification: Enumerate

b Relevant Documents supporting the suspicious transactions: Enumerate

c Copy of Authorization from Covered Institution of Persons Making, Preparing and Approving This Report

PART IV: Suspicious Transaction Information Explanation/Description

Explanation/description of known or suspected violation of law or suspicious transaction.

This section of the report is critical. The care with which it is written may make the difference in whether or not the described conduct and its possible criminal nature are clearly understood. Provide below a chronological and **complete** account of the possible violation of law, including what is unusual, irregular or suspicious about the transaction, using the following checklist as you prepare your account. **If necessary, continue the narrative on a duplicate of this page.**

- a. **Describe** supporting documentation and retain for 5 years.
- b. **Explain** who benefited, directly or indirectly, from the transaction, how much, and how.
- c. **Retain** any confession, admission, or explanation of the transaction provided by the suspect and indicate to whom and when it was given.
- d. **Retain** any confession, admission, or explanation of the transaction provided by any other person and indicate to whom and when it was given.
- e. **Retain** any evidence of cover-up or evidence of an attempt to deceive federal or state examiners or others.
- f. **Indicate** where the possible violation took place (e.g., main office, branch, other).
- g. **Indicate** whether the possible violation is an isolated incident or relates to other transactions.
- h. **Indicate** whether there is any related litigation; if so, specify.
- i. **Recommend** any further investigation that might assist law enforcement authorities.
- j. **Indicate** whether any information has been excluded from this report; if so, why?
- k. If you are correcting a previously filed report, describe the changes that are being made.
- l. **Indicate** whether currency and/or monetary instruments were involved. If so, provide the amount and/or description of the instrument (for example, bank draft, letter of credit, domestic or international money order, stocks, bonds, traveler's checks, wire transfers sent or received, cash, etc.).
- m. **Indicate** any account number that may be involved or affected.

Description of the Suspicious Transactions and Chronology of Events Leading to the Suspicion Using the Guidelines Enumerated Above

PART V: Suspicious Transaction Report Instructions

Safe Harbor Provisions of the Anti-Money Laundering Act of 2001, Republic Act No. 9169, under Section 9 © provides complete protection from criminal, civil and/or administrative liability for all reports of suspected or known criminal violations and suspicious activities to appropriate authorities, including supporting documentation..

Specifically, the law provides that a covered institution, and its directors, officers, employees and agents, that make a disclosure of any possible violation of law or regulation, shall not be liable to any person under any law or regulation of the Philippines or any constitution, law, or regulation of any country or political subdivision thereof, for such disclosure or for any failure to notify the person involved in the transaction or any other person of such disclosure, when such reporting was done in good faith and in the regular performance of their duties and responsibilities under the Act.

The law further requires that a covered institution, and its directors, officers, employees and agents who, by means of a suspicious transaction report, report suspected or known criminal violations or suspicious activities may not notify any person involved in the transaction that the transaction has been reported. Any breach of this confidentiality provision shall render them criminally, civilly and administratively liable under the law.

In situations involving violations requiring immediate attention, such as when a reportable violation is ongoing, the covered institution shall immediately notify, by telephone, appropriate law enforcement and covered institution supervisory authorities in addition to filing a timely suspicious transaction report.

WHEN TO MAKE A REPORT:

1. All covered institutions falling under Section 3 (a)(3) of the Anti-Money Laundering Act of 2001, Republic Act No. 9160 are required to make this report following the discovery of:
 - a. **Violations involving any amount.** Whenever the covered institution detects any known or suspected violation of any the predicate crimes under the Act, or pattern of criminal violations, committed or attempted against the covered institution or involving a transaction or transactions conducted through the covered institution, where the covered institution believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the covered institution was used to facilitate a criminal transaction, and the covered institution has a substantial basis for identifying the suspect, which may include one of its directors, officers, employees, agents or other institution-affiliated parties as having committed or aided in the commission of a criminal act regardless of the amount involved in the violation.
 - b. **Violations aggregating Php500,000.00 or more where a suspect can be identified.** Whenever the covered institution detects any known or suspected predicate crime violation, or pattern of criminal violations, committed or attempted against the covered institution or involving a transaction or transactions conducted through the covered institution and involving or aggregating Php500,000.00 or more in funds or other assets, through one transaction or a series of transactions, where the covered institution reasonably believes that it was either an actual or potential victim of a criminal violation, or series of criminal violations, or that the covered institution was used to facilitate a criminal transaction, and the covered institution has a substantial basis for identifying a possible suspect or group of suspects, which may include one of its directors, officers, employees, agents or other institution-affiliated parties. If it is determined prior to filing this report that the identified suspect or group of suspects has used an alias, then information regarding the true identity of the

suspect or group of suspects, as well as alias identifiers, such as drivers' licenses or social security numbers, addresses and telephone numbers, must be reported.

2. The covered institution shall use as guidelines the examples of suspicious transactions attached as Annex "B" to the Commission's Circular No. _____. These are not intended to be exhaustive and only provide examples of the most basic ways in which money may be laundered. Identification of any of the transactions listed should prompt initial enquiries and, if necessary, further investigations on the source of funds.
3. A covered institution is required to file a suspicious transaction report no later than **five (5)** calendar days after the date of initial detection of facts that may constitute a basis for filing a suspicious transaction report. If no suspect was identified on the date of detection of the incident requiring the filing, a covered institution may delay filing a suspicious transaction report for an additional **ten (10)** calendar days to identify a suspect. In no case shall reporting be delayed more than **twenty (20)** calendar days after the date of initial detection of a reportable transaction.

HOW TO MAKE A REPORT:

1. Send each completed Suspicious Transaction Report to:

**THE EXECUTIVE DIRECTOR
ANTI-MONEY LAUNDERING COUNCIL
BANGKO SENTRAL NG PILIPINAS
ROXAS BOULEVARD
PASAY CITY**

2. For items that do not apply or for which information is not available, leave blank.
3. If you are correcting a previously filed report, check the box at the top of the report (line 1). Complete the report in its entirety and include the corrected information in the applicable boxes. Then describe the changes that are being made in Part IV.
4. If more space is needed to report additional suspects, attach copies of PART IV to provide the additional information.
5. **Identification Requirements for Persons Preparing and Making the Report.— This is important!** All individuals conducting a reportable transaction(s) for themselves or for another person must be identified by means of an official document(s) from the covered institution as the person/s authorized to make such a report.

ANNEX “C”

EXAMPLES OF SUSPICIOUS TRANSACTIONS

GENERAL COMMENTS

The list of situations given below is intended mainly to highlight the basic ways in which money may be laundered. While each individual situation may not be sufficient to suggest that money laundering is taking place, a combination of such situations may be indicative of such a transaction. Further, the list is by no means complete or exhaustive and will require constant updating and adaptation to changing circumstance and new methods of laundering money. The list is intended solely as an aid, and must not be applied as a routine instrument in place of common sense.

EXAMPLES OF SUSPICIOUS TRANSACTIONS:

I. Transactions Which Do not Make Economic Sense

1. Transactions not in keeping with the customer's normal activity, the financial markets in which the customer is active and the business which the customer operates.
2. Buying and selling of securities with no discernible purpose in circumstances which appear unusual.
3. Transactions not in keeping with normal practice in the market in which they relate, e.g., with reference to market size and frequency, or at off-market prices, early termination of products at a loss due to front end loading or early cancellation, especially where cash had been tendered and/or the refund check is to a third party.
4. Other transactions linked to the transaction in question which could be designed to disguise money and divert it to other forms or to other destinations or beneficiaries.
5. The entry of matching buys and sells in particular securities, wash sales, creating an illusion of trading. Such wash trading does not result in a bona fide market position and might provide "cover" for a money launderer.
6. Wash trading through multiple accounts of the same customer with the same or different broker(s) might be used

to transfer accounts by generating offsetting losses and profits in different accounts.

7. Unusual transfers of positions between accounts, whether or not commonly owned.
8. Abnormal settlement instructions, including payment to apparently unconnected parties, and/or where such instructions for settlement are not in accordance with the usual practice of the market or the Regulated Intermediary.

II. Transactions Involving Overseas Jurisdiction

1. A customer introduced by an overseas bank, affiliate, Regulated Intermediary or other investor, all of which are based in countries where production of drugs, drug trafficking or graft and corruption may be prevalent.
2. A large number of security transactions across a number of jurisdictions.

III. Transactions Involving Unidentified Parties

1. A personal customer for whom verification of identity proves unusually difficult and who is reluctant to provide details.
2. A corporate/trust customer where there are difficulties and delays in obtaining copies of the accounts or other documents of incorporation.
3. Any transaction in which the counterparty to the transaction is unknown.
4. Settlement either by registration or delivery of securities to be made to an unverified third party.
5. Customers who wish to maintain a number of trustee or customers' accounts that do not appear consistent with their

type of business, including transactions that involve nominee names.

6. A number of transactions by the same counterparty in small amounts relating to the same security, each purchased for cash, then sold in one transaction, the proceeds being credited to an account different from the original account, the owner of which is unverified.

IV. Miscellaneous

1. Large or unusual transactions in cash or bearer forms, remittances and transfers of funds.
2. The use of a customer of an intermediary to holds funds that are not being used to trade in securities.
3. A customer who deals with an intermediary only in cash or cash equivalents rather than through banking channels.
4. A customer who opens several accounts, in his own name or that of a nominee/s, trustee/s, agent/s, or dummy/ies, that do not appear to be consistent with their type of business.
5. The known background of the person conducting the transaction is not consistent with the transaction, and/or any unusual behavior in conducting the transaction;
6. The production of seemingly false identification in connection with any transaction, the use of aliases and a variety of different addresses;
7. A client with no discernible purpose for using the covered institution's service, where such service can easily be provided elsewhere with more convenience to client.