

聯合財富情報組年報

Joint Financial Intelligence Unit Annual Report

2020



Financial Intelligence And Investigation Bureau
財富情報及調查科

VISION AND 抱負及使命 MISSION

抱負

That the Joint Financial Intelligence Unit (JFIU) remains one of the leading Financial Intelligence Units (FIUs) in the Asia/Pacific Region

VISION

保持聯合財富情報組在亞太區內其中一個主要的財富情報單位的領先地位

That the JFIU continues to assist the Government in its efforts to protect Hong Kong from illicit activities of money laundering (ML) and terrorist financing (TF) by:

Juxtaposing the JFIU's professional standards with relevant international standards

Fostering and strengthening cooperation with local and international agencies in the exchange of financial intelligence

Intelligently analyzing suspicious transaction report (STR) received by the JFIU and making disseminations as appropriate

Upgrading relevant sectors' awareness and understanding of ML and TF issues

使命

MISSION

聯合財富情報組致力協助政府保護香港免受清洗黑錢及恐怖分子資金籌集等非法活動的影響，方法包括：

- 致使聯合財富情報組的專業標準與相關的國際標準接軌
- 在交換財富情報方面與本地及國際機構加強合作
- 對接收的可疑交易報告進行精細分析並且適時發布
- 加強相關業界對清洗黑錢及為恐怖分子資金籌集問題的意識及了解

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1

MESSAGE FROM THE HEAD OF JFIU

聯合財富情報組
主管序言

香港的強大競爭力有利於我們金融服務業的蓬勃發展，並鞏固香港繼續作為國際金融中心的地位。眾所周知，我們的經濟體系保障資金和資訊的自由流動，因此吸引大量來自世界各地的投資。打擊洗錢的持份者一直在香港強而有力的打擊洗錢及恐怖分子資金籌集制度下竭盡所能，實施多項立法、監管及行政措施，多管齊下，共同打擊相關活動。這些措施不但有效減低罪犯利用本港經濟體系的便利處理犯罪得益及懷疑恐怖分子財產的機會，亦有助提升香港作為國際金融中心的公信力。

聯合財富情報組自1989年成立以來，一直與多方面的持份者緊密合作，打擊洗錢及恐怖分子資金籌集。相關持份者包括政府決策局、監管機構及其他私人機構。有賴金融機構和指定非金融企業及行業的持續支持，可疑交易報告的質素不斷提升；而憑執法機關和呈報機構的通力合作，很多罪案得以及早發現，使財富調查更有效率，增加攔截懷疑非法資金的成效。

隨著近年科技發展一日千里，數碼轉型愈趨迅速，電子支付亦日見普及盛行。不法之徒亦乘科技之便，利用加密貨幣的匿名特性及電子支付的便利，進行跨境犯罪及清洗犯罪得益。

Hong Kong's competitive edges are conducive to the development of our dynamic financial services sector and will continue to uphold Hong Kong's status as a credible global financial hub. Our economic system is renowned for its free flow of capital and information, attracting massive investments from all around the world. Alongside Hong Kong's strong anti-money laundering and counter-financing of terrorism (AML/CFT) regime, various AML stakeholders in Hong Kong have continuously exerted best efforts in the implementation of legal, regulatory and operational measures for combatting money laundering and terrorist financing (ML/TF). Not only is the vulnerability to ML/TF due to the convenience exploited by criminals for dealing with proceeds of crime or suspected terrorist properties minimised, Hong Kong's creditability as a trusted international financial centre is also enhanced.

Since the establishment of Joint Financial Intelligence Unit (JFIU) in 1989, we have been collaborating closely with multifarious AML/CFT stakeholders including government policy bureaux, regulatory authorities and other private entities to combat ML/TF activities. To the credit of the continuous supports from financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs), the quality of suspicious transaction reports (STRs) is improved and many crimes are detected in early stages with the concerted efforts of both law enforcement agencies and reporting entities, expediting financial investigations and yielding higher likelihood in intercepting suspected illicit funds.

In light of the rapid technological advancement over the past couple of years, digital transformation has been accelerated and electronic payments have become very popular. Contrarily criminals also heavily exploit technology, anonymity of cryptocurrencies and convenience of electronic payments for committing transnational crimes and laundering crime proceeds.

為維護香港作為國際金融中心的地位，以及在瞬息萬變的環境應對打擊洗錢及恐怖分子資金籌集所帶來的挑戰，我們已於2020年10月擴充規模，為成立「財富情報及調查科」做好準備。「財富情報及調查科」為獨立的專責部門，包括聯合財富情報組，以及財富調查組和總部等相關職能組別，主要協助財經事務及庫務局，與各持份者緊密合作，負責有關洗錢及恐怖分子資金籌集方面的政策及立法事宜、策略分析、持續性全港風險評估、培訓及外展工作。來年，我們將以全新面貌，繼續緊守崗位，致力打擊金融罪案。

面對2019冠狀病毒病的威脅，全球一致同心抗疫。聯合財富情報組因應防疫措施，保持社交距離措施，積極舉辦網上研討會，在無須親身會面的情況下，繼續與合作夥伴分享情報，加強他們對洗錢趨勢的認識。我們亦不時參與由國際刑警組織、財務行動特別組織，以及亞洲太平洋反清洗黑錢組織等機構透過電腦網絡舉辦的國際會議及工作坊，繼續與其他來自世界各地的財富情報單位及機構保持聯繫，分享專業知識。我們正在編製深入的策略分析，就解決已識別的威脅提供務實的建議，並會於其後向其他打擊洗錢持份者發布相關風險指標。

最後，我謹藉此答謝所有相關人士，盡心竭力加強香港對洗錢、恐怖分子資金籌集及相關罪行的抵禦能力。憑藉各位全力支持，聯合財富情報組定能迎接未來的新挑戰，繼續打擊洗錢及恐怖分子資金籌集，開創更美好的明天。

To optimise our capability in safeguarding Hong Kong's status as an international financial centre and overcoming the AML/CFT challenges ahead in the fast-changing environment, we have expanded in October 2020, in preparation of the establishment of 'Financial Intelligence and Investigation Bureau', a specialist stand-alone bureau including the JFIU and related functions such as a financial investigation division and headquarters. As a dedicated unit supporting the Financial Services and the Treasury Bureau, we work closely with various stakeholders for AML/CFT policy and legislation matters, strategic analysis, on-going territory-wide risk assessment, as well as training and outreaching. In the coming year, we will be revitalised as a new formation and strive to maintain our professional work in fighting financial crimes.

While the world is united in the fight against COVID-19, the JFIU understands the importance of strict adherence to social distancing measures imposed. Still the JFIU continues to conduct knowledge sharing with our fellow partners through actively holding webinars instead of physical seminars for heightening the understanding on the emerging money laundering trends. Internationally, our liaison and expertise sharing with other financial intelligence units (FIUs) and agencies across the globe are maintained in the cyberspace as we constantly participate in various international conferences and workshops hosted by authorities such as INTERPOL, the Financial Action Task Force (FATF) as well as the Asia/Pacific Group on Money Laundering (APG). Our productions of in-depth strategic analyses providing pragmatic recommendations on tackling the identified threats are underway and relevant risk indicators would be disseminated to other AML stakeholders afterwards.

Finally, thank all having contributed to the enhancement of Hong Kong's resilience to money laundering, terrorist financing and associated offences. With the unfailing support from you, the JFIU will rise to the new AML/CFT challenge ahead, with the aim of endeavouring towards a better future.

Carmen LEUNG
Superintendent of Police
HEAD of JFIU, Hong Kong

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ABOUT
JFIU

聯合財富情報組

聯合財富情報組 About JFIU

聯合財富情報組由香港警務處及香港海關人員組成。本組屬執法型財富情報單位，而非調查單位。本組是負責管理本港可疑交易舉報機制的唯一機構，並與世界各地的財富情報單位及執法機關交換財富情報。

本組與不同機構通力合作，憑藉其情報分析能力和觀點，為本港的打擊洗錢及恐怖分子資金籌集制度出一分力。我們的合作伙伴，包括政府決策局及部門、金融監管機構及其他專業團體、執法機關及財富情報單位、洗錢及恐怖分子資金籌集風險評估小組，以及金融機構及指定非金融企業及行業。

本組角色 OUR ROLE

The JFIU is co-staffed by officers of the Hong Kong Police Force (HKPF) and the Hong Kong Customs and Excise Department (C&ED). It is a law-enforcement-type of FIU but not an investigative unit. Apart from being the sole agency to manage the suspicious transaction reporting regime for Hong Kong, it also engages in financial intelligence exchange with FIUs and Law Enforcement Agencies (LEAs) worldwide.

Distinctive in its intelligence analysis capabilities and perspectives, the JFIU contributes to the AML/CFT regime through close inter-agency collaboration with policy bureaux and government departments, financial regulators and other professional bodies, LEAs and FIUs, ML and TF Risk Assessment Unit (RAU), FIs and DNFBPs.

本組職責 OUR CHARTER

本組就內在及外在風險持續進行評估，履行廣泛職務，銳意打擊和防範洗錢、相關的上游罪行及恐怖分子資金籌集。有關職務列舉如下：

- 就可疑交易報告進行行動分析
- 與世界各地交換財富情報及資訊
- 就財富情報及其他資訊進行策略分析
- 就洗錢及恐怖分子資金籌集活動趨勢和類型學進行研究
- 運作可疑交易報告管理系統 (STREAMS)
- 為防止繼續處理可疑財產的臨時措施提供支援
- 參謀本地及國際打擊洗錢及恐怖分子資金籌集的政策事宜
- 籌辦打擊洗錢及恐怖分子資金籌集培訓及外展活動

The JFIU performs diverse responsibilities to combat and deter ML, associated predicate offences and TF in view of the ongoing internal and external risk assessment. Its duties include:

- operational analysis of STRs
- global exchange of financial intelligence and information
- strategic analysis of financial intelligence and other information
- research on ML/ TF trends and typologies
- operation of the Suspicious Transaction Report and management System (STREAMS)
- support on provisional measures to prevent further dealing of suspicious property
- staffing of local and international AML/CFT policy matters
- coordination of AML/CFT training and outreach

本組的發展里程 OUR MILESTONES

自1989年起，聯合財富情報組不斷求變立新，緊貼本地立法進程及國際打擊洗錢及恐怖分子資金籌集的標準。本組的主要里程碑概述如下：

Since 1989, the JFIU has been evolving to keep pace with the local legislation and international AML/CFT standards. The major milestones are outlined below:

1989

香港首條打擊清洗黑錢法例《販毒（追討得益）條例》（第405章）實施，聯合財富情報組隨即成立，隸屬香港警務處毒品調查科財富調查組，是本港專責接收、分析和發布可疑交易報告的財富情報單位。

With the first piece of AML legislation, the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP, Cap. 405) implemented in Hong Kong, the JFIU was thus formed under Financial Investigation Division of Narcotics Bureau (FID NB) of Hong Kong Police Force (HKPF) as the designated unit of Hong Kong to receive, analyze and disseminate STRs.

1994

《有組織及嚴重罪行條例》（第455章）是第二條在香港制定以打擊洗錢的法例，把洗錢罪行延展至涵蓋本港可公訴罪行及世界各地類同犯罪行為的得益。同時，條例賦予本組更多權力，以管理可疑交易報告的機制。

The enactment of the second piece of AML legislation, the Organized and Serious Crimes Ordinance (OSCO, Cap. 455), extended the money laundering offence to cover the proceeds of indictable offences in Hong Kong and similar conduct worldwide. It further empowered the role of the JFIU to manage the STR regime.

1997

香港成為亞洲／太平洋反清洗黑錢組織（亞太反洗錢組織）的創始成員。聯合財富情報組密切留意區內的洗錢及恐怖分子資金籌集活動的趨勢及類型學分析。

Hong Kong became a founding member of the Asia/Pacific Group on Money Laundering (APG). The JFIU continued paying close attention to the money laundering / terrorist financing trends and typologies within the region.

1991

香港成為財務行動特別組織的成員。此後，聯合財富情報組掌握國際間打擊洗錢及恐怖分子資金籌集標準的最新發展，特別是組織對財富情報單位施加的標準。

Hong Kong joined the Financial Action Task Force (FATF) as a member. The JFIU has been kept up-to-date with the latest development of international AML/CFT standards, especially those imposed on FIUs.

1996

聯合財富情報組加入由世界各地財富情報單位合組的埃格蒙特組織，成為組織成員。自此，本組善用埃格蒙特組織的保密網絡，與環球財富情報單位交換情報，並參與組織的會議及培訓課程，以提升處理財富情報的整體能力。

The JFIU joined the Egmont Group of Financial Intelligence Units (Egmont Group) as a member. Since then, the JFIU has been making good use of Egmont Group's secure network to exchange intelligence with FIUs worldwide, and taking part in the Egmont Group's meetings and training sessions to enhance its overall financial intelligence capability.

2002

《聯合國（反恐怖主義措施）條例》（第575章）頒布，本組開始接收有關恐怖分子財產的可疑交易報告。

The United Nations (Anti-Terrorism Measures) Ordinance (UNATMO, Cap 575) was promulgated and it further empowered the JFIU to receive STRs related to terrorist property.

2012

《打擊洗錢及恐怖分子資金籌集（金融機構）條例》（第615章）實施，就客戶作盡職審查及備存紀錄等的本港防範措施訂明規定，相關修訂間接提升業內對打擊洗錢及恐怖分子資金籌集活動的意識，以致可疑交易報告的數量急升。

The enactment of the Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO, Cap 615) codified Hong Kong's preventive measures such as requirements on customer due diligence and record keeping, which indirectly increased AML/CFT awareness and thus led to an upsurge in the number of STRs.

2018

《聯合國（反恐怖主義措施）條例》的修訂，加強凍結恐怖分子財產的機制，並禁止資助外國恐怖主義戰鬥人員的旅程。此外，《打擊洗錢及恐怖分子資金籌集條例》的修訂，把當中就客戶作盡職審查及備存紀錄的規定延展至指定非金融企業及行業人士。

The amendment of the UNATMO enhanced the freezing mechanism of terrorist property and prohibited the financing of travel of foreign terrorist fighter. Also, the amendment of the AMLO extended the customer due diligence and record-keeping requirements therein to designated non-financial business and professions.

2020

警務處將於2021年成立一個專責打擊洗錢及恐怖分子資金籌集的部門——財富情報及調查科，以應對與日俱增和日趨複雜多樣的金融罪案。為加強警隊打擊洗錢及恐怖分子資金籌集活動的能力，聯合財富情報組增設五個情報分析小組，為成立「財富情報及調查科」作好準備。

The increase in the sheer volume, diversity and complexity of financial crimes calls for a dedicated establishment with the necessary stature - the Financial Intelligence and Investigations Bureau. In preparation of its establishment in 2021 and with a view to maximizing HKPF's capability in tackling ML/TF crimes, five additional intelligence analysis teams under the JFIU were set up.

2014

隨 洗錢及恐怖分子資金籌集風險評估小組在香港警務處成立，本組持續為全港風險評估提供資料。

Along with the establishment of the Money Laundering and Terrorist Financing Risk Assessment Unit (RAU) under the HKPF, the JFIU has been contributing its input to the territory-wide risk assessment exercise of Hong Kong.

2019

特別組織於2019年9月發表了就香港進行的成員相互評核報告，讚揚香港在打擊洗錢及恐怖分子資金籌集方面的努力。報告印證香港的打擊洗錢及恐怖分子資金籌集制度獲評為合規而有效，使香港成為亞太區首個成功通過特別組織今輪審核的司法管轄區。

The FATF published the Mutual Evaluation Report (MER) of Hong Kong in September 2019, commending Hong Kong's efforts in combating Money Laundering and terrorist financing. The MER noted that Hong Kong's AML/CFT regime is assessed to be compliant and effective overall, making it the first jurisdiction in the Asia-Pacific region to have achieved an overall compliant result in the current round of FATF evaluation.

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JFIU ACHIEVEMENT HIGHLIGHTS IN 2020

2020年聯合財富情報組的
工作成果概覽



JFIU Achievement Highlights in 2020

2020年
聯合財富情報組
的主要工作
成果概覽

1

接獲可疑交易報告總數
Total Number of STRs Received



2

84.94%的可疑交易報告由銀行業提交
84.94% of STRs were filed by banking sectors



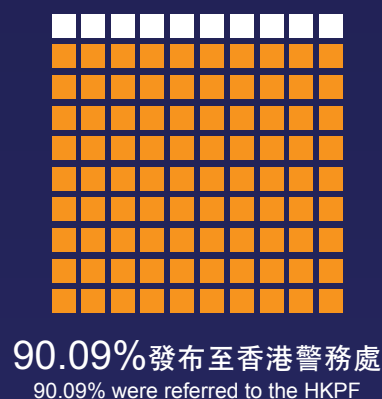
3

發布的可疑交易報告總數
Total Number of STRs Disseminated



4

發布的可疑交易報告中，
90.09%發布至香港警務處
90.09% of the disseminated STRs were referred to the HKPF



5



88.40%

88.40%的可疑交易報告
經電子方式提交
88.40% of STRs were filed via e-submission

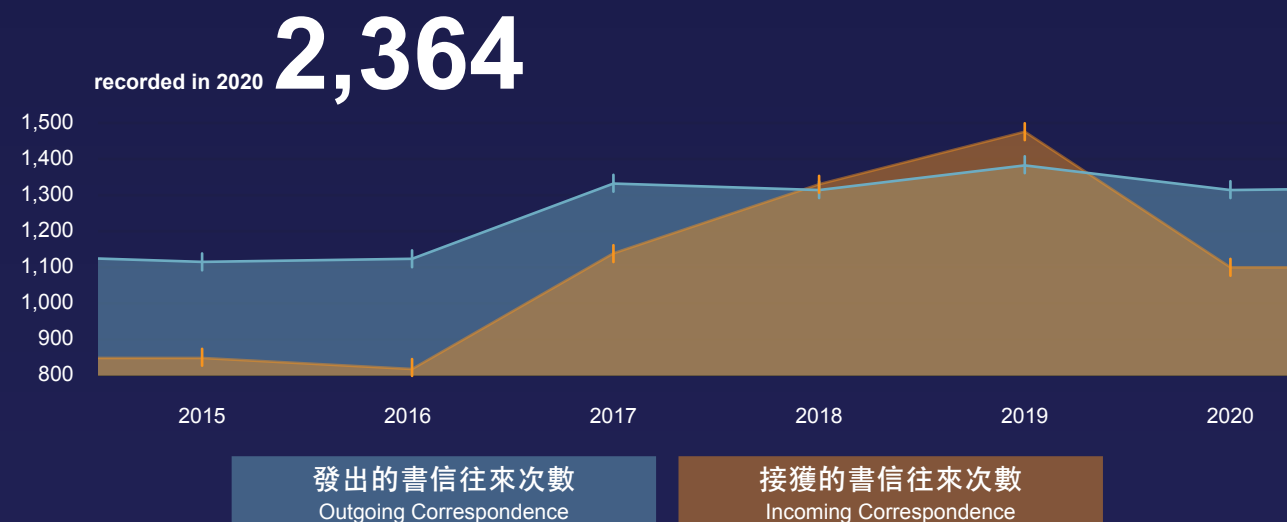
6



至2006年起，共簽訂了14份諒解備忘錄或協議
14 MOUs or agreements were signed since the year of 2006

7

聯合財富情報組與世界各地財富情報單位交換財富情報的書信往來共錄得2,364次
2,364 correspondences were recorded in Financial Intelligence Exchange between the JFIU & FIUs Worldwide



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舉辦11個打擊洗錢及恐怖分子資金籌集講座
以向不同業界傳達舉報可疑交易的資訊
11 AML/CFT seminars were delivered to convey key messages of
suspicious transaction reporting to different sectors

FOUR

SUSPICIOUS TRANSACTION REPORT

可疑交易報告

舉報可疑交易的法律依據 Legal Basis for Suspicious Transaction Report

根據《販毒（追討得益）條例》（第405章）及《有組織及嚴重罪行條例》（第455章）第25A(1)條，以及《聯合國（反恐怖主義措施）條例》（第575章）第12(1)條，凡任何人知道或懷疑任何財產是(a)全部或部分、直接或間接代表任何人從販毒或可公訴罪行的得益；(b)曾在與販毒或可公訴罪行有關的情況下使用；或(c)擬在與販毒或可公訴罪行有關的情況下使用；或凡任何人知悉或懷疑任何財產是恐怖分子財產，該人須在合理／切實可行的範圍內盡快將該知悉或懷疑向獲授權人（即聯合財富情報組人員）披露（即以提交可疑交易報告的方式披露）。

聯合財富情報組採取以風險為本的方式分析接獲的可疑交易報告。除了向呈報機構作出回應外，本組亦會向各機構發布財富情報，以採取適當的跟進行動。此外，本組並會與打擊洗錢及恐怖分子資金籌集相關的持份者保持聯繫，讓他們了解最新的可疑交易指標及個案類型。

Pursuant to sections 25A(1) of the Drug Trafficking (Recovery of Proceeds) Ordinance (DTROP, Cap. 405) and the Organized and Serious Crimes Ordinance (OSCO, Cap. 455), as well as section 12(1) of the United Nations (Anti-Terrorism Measures) Ordinance (UNATMO, Cap. 575), where a person knows or suspects that any property (a) in whole or in part directly or indirectly represents any person's proceeds of; (b) was used in connection with; or (c) is intended to be used in connection with drug trafficking or an indictable offence; or where a person knows or suspects that any property is terrorist property, the person shall as soon as it is reasonable/practicable for him/her to do so, disclose that knowledge or suspicion (i.e. by way of STR) to an authorized officer (i.e. JFIU officer).

The JFIU adopts a risk-based approach in analysing the STRs received. Apart from providing feedback to respective reporting entities, financial intelligence is disseminated to various agencies for follow-up actions as appropriate. The JFIU also endeavours to keep relevant AML/CFT stakeholders informed of the recent suspicious indicators and case typologies.

《打擊洗錢及恐怖分子資金籌集條例》 (第615章)

Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap.615 (AMLO)

經修訂的《打擊洗錢及恐怖分子資金籌集條例》已於2018年3月1日實施。修訂內容包括：把當中就客戶作盡職審查及備存紀錄的規定擴大至涵蓋指定非金融企業及行業人士，包括法律專業人士、會計專業人士、地產代理及信託或公司服務提供者；並引入信託或公司服務提供者發牌制度，規定該等服務提供者須向公司註冊處處長申請牌照，並符合適當人選準則，方可在香港經營提供信託或公司服務的業務。

The amended AMLO commenced operation on 1 March 2018. Amendments include the extension of the customer due diligence and record-keeping requirements therein to designated non-financial business and professions including legal professionals, accounting professionals, estate agents and TCSPs; and the introduction of a licensing regime for TCSPs requiring them to apply for a license from the Registrar of Companies and satisfy a "fit-and-proper" test before they can provide trust or company services as a business in Hong Kong.

《聯合國（反恐怖主義措施）條例》 (第575章)

United Nations (Anti-Terrorism Measures) Ordinance, Cap.575 (UNATMO)

修訂《聯合國（反恐怖主義措施）條例》的法案於2018年3月獲立法會制定成為法例，並於2018年5月31日實施，旨在加強凍結恐怖分子財產的機制，並禁止資助外國恐怖主義作戰人員的旅程。

The bill to amend UNATMO, enhancing the freezing mechanism of terrorist property and prohibiting the financing of travel of foreign terrorist fighter, was enacted by the Legislative Council in March 2018 and operation was commenced on 31 May 2018.

《公司條例》(第622章)

Companies Ordinance, Cap.622 (CO)

經修訂的《公司條例》已於2018年3月1日實施，規定在香港成立為法團的公司須備存重要控制人登記冊，以提升法團實益擁有權的透明度。

The amended CO commenced operation on 1 March 2018, requiring the keeping of significant controllers registers by companies incorporated in Hong Kong to enhance transparency of corporate beneficial ownership.

《實體貨幣及不記名可轉讓票據跨境流動條例》 (第629章)

Cross-boundary Movement of Physical Currency and Bearer Negotiable Instruments Ordinance, Cap.629

《實體貨幣及不記名可轉讓票據跨境流動條例》於2017年6月獲立法會制定成為法例，並於2018年7月16日實施，以落實貨幣及不記名可轉讓票據（現金類物品）跨境流動的申報／披露制度。

The Cross-boundary Movement of Physical Currency and Bearer Negotiable Instruments Ordinance was enacted by the Legislative Council in June 2017 and operation commenced on 16 July 2018. The Ordinance was introduced to implement a declaration/disclosure system for cross-boundary movement of currency and bearer negotiable instruments.

接收可疑交易報告 Receipt of STRs

聯合財富情報組於2020年共接獲57,130宗可疑交易報告，與上年度比較，上升11%（即增加5,542宗報告）。金融機構提交的報告數目繼續佔超過全年總數的95%，其中銀行業為近年主要的報告來源。銀行業提交的報告數目上升，在若干程度上受最近成立的虛擬銀行影響。在引入虛擬銀行後，本組一直就舉報可疑交易事宜，主動與相關代表合作。而虛擬銀行業於2020年3月第一所虛擬銀行在本港投入服務起，在2020年度已提交637宗報告。此外，金錢服務經營者提交的報告數目也有上升趨勢，而儲值支付工具持牌人於2020年提交的報告數目亦較去年增加接近一倍。

The JFIU received a total of 57,130 STRs in the year of 2020 and an 11% increase in number (5,542 STRs) is noted as compared with the previous year. Financial institutions continue to account for over 95% of the annual total STR submissions, with the banking sector as the dominant contributor in the past few years. The increase in STR submissions by the banking sector is partly contributed by the recently launched virtual banks. Upon the introduction of virtual banks, the JFIU has been actively collaborating with their representatives on the reporting of suspicious transactions. 637 STRs were filed by the sector in 2020 since the launch of the very first virtual bank in Hong Kong in March 2020. Besides, there was a general rising trend in submissions filed by money service operators, whilst the number of submissions filed by stored value facilities licensees almost doubled in 2020.

行業 Sectors			2016	2017	2018	2019	2020
金融機構 Financial Institutions	銀行 Banks	傳統銀行 Traditional Banks	68,745 (89.76%)	86,029 (93.39%)	68,146 (92.23%)	44,689 (86.63%)	47,888 (83.82%)
		虛擬銀行 Virtual Banks (2020年3月起新設的界別) (New Category since March 2020)	/	/	/	/	637 (1.12%)
	保險公司 Insurance Companies		928 (1.21%)	1,094 (1.19%)	1,236 (1.67%)	1,335 (2.59%)	1,179 (2.06%)
	放債人 Money Lenders		24 (0.03%)	28 (0.03%)	39 (0.05%)	34 (0.07%)	17 (0.03%)
	證券公司 Securities Firms		1,423 (1.86%)	2,090 (2.27%)	1,337 (1.81%)	735 (1.42%)	694 (1.21%)
	儲值支付工具持牌人 Stored Value Facilities Licensees		67 (0.09%)	590 (0.64%)	529 (0.72%)	1,321 (2.56%)	2,512 (4.40%)
	金錢服務經營者 Money Service Operators		2,554 (3.33%)	908 (0.99%)	1,219 (1.65%)	1,474 (2.86%)	2,033 (3.56%)
	金融機構提交的報告總數 Total Number of STRs Filed by All Financial Institutions (% of all STRs Received) (佔報告總數比率)			73,741 (96.28%)	90,739 (98.51%)	72,506 (98.13%)	49,588 (96.12%)
指定非金融企業及行業 DNFBP	地產代理 Estate Agencies		58 (0.08%)	71 (0.08%)	47 (0.06%)	74 (0.14%)	93 (0.16%)
	貴重金屬及寶石交易商 Dealers in Precious Metals & Stones		59 (0.08%)	60 (0.07%)	70 (0.09%)	20 (0.04%)	25 (0.04%)
	法律專業人士 Legal Professionals		969 (1.27%)	555 (0.60%)	416 (0.56%)	810 (1.57%)	807 (1.41%)
	會計專業人士 Accounting Professionals		3 ($<0.01\%$)	9 (0.02%)	22 (0.03%)	18 (0.03%)	16 (0.03%)
	信託及公司服務提供 Trust & Company Services Providers		27 (0.04%)	31 (0.03%)	81 (0.11%)	91 (0.18%)	104 (0.18%)
指定非金融企業及行業提交的報告總數 Number of STRs Filed by All DNFBPs (% of all STRs Received) (佔報告總數比率)			1,116 (1.46%)	736 (0.80%)	636 (0.86%)	1,013 (1.96%)	1,045 (1.83%)
其他行業提交的報告宗數 Number of STRs Filed by Others			1,733 (2.26%)	640 (0.69%)	747 (1.01%)	987 (1.91%)	1,125 (1.97%)
接獲報告總數 Total Number of STRs Received			76,590	92,115	73,889	51,588	57,130

分析可疑交易報告

Analysis of STRs

本組依靠各行業提交的可疑交易報告，作為日常行動分析和策略分析的主要資料來源。本組採取風險為本的方法，評估和審視每宗接獲的報告，並定期參考洗錢及恐怖分子資金籌集的最新發展和趨勢。本組亦會根據可疑交易報告所涉的潛在洗錢及恐怖分子資金籌集風險、情報價值，以及促成往後調查或採取其他跟進行動的可行性，全面分析經選定具潛質的報告，冀能拓展優質的財富情報成果。

The JFIU relies greatly on the STRs received from various sectors as the major source of information for conducting routine operational and strategic analyses. Risk-based approach is adopted in the assessment and examination of each and every STR received, with regular reference to the latest ML/TF landscape and trends. After reviewing the level of inherent ML/TF risks, the value of intelligence, and the prospect for further investigation or other follow-up actions, a more holistic analysis may be conducted on selected STRs which deem to have the potential to develop quality financial intelligence products.

發布可疑交易報告

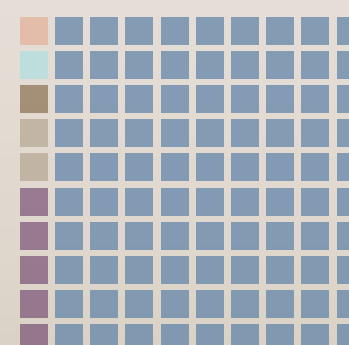
Dissemination of STRs

本組透過發布可疑交易報告，向執法機關及監管機構提供有用的情報。在透徹分析每宗財務報告後，可取得有助後續調查的資料。經評估確定有用及／或可採取進一步行動的情報，會向相關機關及／或世界各地的財富情報單位發布。2020年，本組共接獲57,130宗可疑交易報告，其中獲發布的可疑交易報告有19,077宗，發布比率達33.39%，為近年之新高，而香港警務處為獲發布可疑交易報告的主要對象（佔90.09%）。

The JFIU aims to develop useful leads to LEAs and regulators via disseminating STRs of which information beneficial to subsequent investigation could be extracted after conducting thorough financial analysis. If the assessments deem the intelligence to be useful and/or actionable, the intelligence will be disseminated to the relevant agencies and/or FIUs worldwide. Out of the 57,130 STRs received in the year of 2020, 19,077 were disseminated with HKPF as the major recipient (90.09%), recording the highest dissemination rate of 33.39% in the past years.

	2016	2017	2018	2019	2020
發布的可疑交易報告總數 Total Number of STRs Disseminated	12,631	13,566	15,349	13,039	19,077
可疑交易報告發布比率 STRs Dissemination Rate	16.49%	14.73%	20.77%	25.28%	33.39%

STR Dissemination 發布可疑交易報告



- 香港警務處 Hong Kong Police Force 90.09%
- 香港海關 Customs and Excise Department 4.49%
- 證券及期貨事務監察委員會 Securities and Futures Commission 1.92%
- 廉政公署 Independent Commission Against Corruption 1.15%
- 執法機關和世界各地的財富情報單位 LEAs and FIUs Worldwide 1.29%
- 其他機關 Other Authorities 1.06%

取閱可疑交易報告資料

Access to STR Information

本組將大量可疑交易報告資料備存在於2006年推出的可疑交易報告管理系統（STREAMS）網絡平台。因應法定要求和資料保安措施，本港執法機關可向本組提出正式申請，要求索取在可疑交易報告管理系統的備存資料（有關資料可涵蓋疑犯、可疑公司、可疑帳戶、交易及資金流向）。本港授權用戶（包括香港警務處、香港海關及聯合財富情報組人員）亦可直接在可疑交易報告管理系統搜尋資料，以便適當運用財富情報進行日常調查／情報拓展工作，並適時支援其他工作需要。

2016至2020年間，每年要求在可疑交易報告管理系統進行資料索取的次數由3,113次上升至4,876次，錄得56.63%的升幅，而直接在可疑交易報告管理系統進行搜尋的次數，則累計有808,877次。過往五年的數字均反映各界對可疑交易報告管理系統資料的需求急增，因有關情報有助對洗錢、恐怖分子資金籌集及相關上游罪行採取執法行動。

The JFIU has a wealth of STR information available on the web-based Suspicious Transaction Report and Management System (STREAMS), which was first launched in 2006. In line with the statutory confines and information security safeguards, the JFIU welcomes local LEAs to make formal requests for STREAMS record checks for information (possibly covering suspects, suspected companies, suspicious accounts, transactions and fund flow); it also allows local authorized users (including the HKPF, C&ED and JFIU officers) to conduct direct searches on STREAMS to facilitate the appropriate use of financial information in daily investigations/intelligence cultivation, and support various operational needs in a timely manner.

Between 2016 and 2020, the annual number of request for STREAMS record checks made to the JFIU mounted by 56.63% from 3,113 to 4,876; whilst a total of 808,877 direct searches were made on STREAMS. The escalating demand for STR information, which is considered conducive to enforcement actions against ML, TF and associated predicates, is reflected by the data throughout the five years.

	2016	2017	2018	2019	2020
要求在可疑交易報告管理系統進行資料索取的次數 Total Number of Requests for STREAMS Record Checks	3,113	3,301	4,796	5,062	4,876
在可疑交易報告管理系統進行直接搜尋的次數 Total Number of Direct Searches on STREAMS	135,421	135,863	171,302	151,561	214,730

為提高呈交報告的效率及準確性，可疑交易報告電子舉報系統於2018年8月啟用，用家可使用經修訂的可疑交易報告電子表格提交報告。我們亦集中提升可疑交易報告管理系統，工程旨在提升本組處理、分析和發布財富情報的能力，以及借助系統功能互用，應付將來數量龐大的可疑交易報告。

本組正研究運用大數據和人工智能，提升用作檢查可疑交易報告的電腦系統。透過應用新科技，我們進行行動及策略分析的效率和能力將得以提升。

In order to enhance the efficiency and accuracy in STR submission and processing, "e-STR Submission" using a revised STR proforma has been rolled out in August 2018. We also focused on the STREAMS enhancement project aiming at improving the JFIU's capability in processing, analysing and disseminating financial intelligence as well as leveraging its functional interoperability to better cope with the tremendous volume of STRs in the long run.

Currently, the JFIU is exploring the upgrade of computer system for screening STRs with the use of big data and artificial intelligence. As a benefit from the application of new technology, our efficiency and capability in conducting operational and strategic analysis will be ramped up.

	2016	2017	2018	2019	2020
以電子方式處理的可疑交易報告比率 % of Electronic Processing of STRs (Total Number of STRs Involved) (涉及的可疑交易報告總數)	88.77% (67,994)	92.91% (85,582)	91.44% (67,565)	87.62% (45,203)	88.40% (50,501)
以人手方式處理的可疑交易報告比率 % of Manual Processing of STRs	11.23%	7.09%	8.56%	12.38%	11.60%

可疑交易報告質素意見回饋 Feedback on STR Quality

可疑交易報告機制能否發揮效用，取決於不同呈報界別所提交可疑交易報告的整體質素。因此，本組會視乎需要，就可疑交易報告的質素及數量兩方面向監管機構、專業團體和舉報機構提供意見回饋。本組就可疑交易報告出版《可疑交易報告季度分析》（可於聯合財富情報組網頁限制區閱覽），藉以加強與私營界別的雙向溝通，同時提升私營界別對打擊洗錢及恐怖分子資金籌集的意識。金融機構和指定非金融企業及行業可從中獲取最新資訊，例如撰寫優質可疑交易報告的指引和建議格式、顯示呈報趨勢的統計數字、有關洗錢及恐怖分子資金籌集的案例和類型學研究，以及他們日常遵從打擊洗錢及恐怖分子資金籌集的規定和管制措施而採取的良好行事方法。

隨 香港金融科技及普及金融的發展，尤其在2019冠狀病毒病疫情的影響下，政府、企業及個人日益趨向使用網上系統遙距工作。雖然電子銀行服務、「轉數快」交易及儲值支付工具的智能支付非常方便，卻也為罪犯提供新的犯罪機會。罪犯可利用遙距開戶及交易，操控多個傀儡帳戶，在無須現身的情況下清洗非法得益。舉報可疑交易的機構應採用科技方案減低風險，並應在監督交易時保持警覺，採取有效的「認識你的客戶」程序識別可疑活動。本組未來會與所有持份者保持緊密合作，應對日後各種新興起的挑戰。

The overall quality of STR input from various reporting sectors is of paramount importance to the effectiveness of the suspicious transaction reporting regime. Thus the JFIU provides quantitative and qualitative feedback on STRs to regulatory agencies, professional bodies and reporting entities as appropriate. The JFIU publishes STR Quarterly Analysis (made available through the secure area of JFIU's website) to enhance mutual communication and raise AML/CFT awareness of the private sector. FIs and DNFBPs are kept up-to-date with useful guidelines, the preferred framework for making quality STRs and STR statistics that indicate their filing trends, case examples on the latest ML/TF-related typologies and other good practices observed in their daily AML/CFT compliance and control.

With the advancement in fintech development and financial inclusion in Hong Kong, particularly under the impact of COVID-19 pandemic, the Government, businesses and individuals are increasingly turning to online systems to enable remote work. The uses of e-banking services, faster payment system transactions and smart payment through Stored Value Facilities (SVFs) have brought convenience to customer, while these systems also provided new opportunities for criminals. Exploiting the advantage of remote account onboarding and transactions, criminals could manipulate multiple stooge accounts to launder illicit proceeds without physical presence. Reporting entities are encouraged to employ technology solutions to mitigate the risks, and exercise vigilance during transaction monitoring with effective know-your-customer process in identifying suspicious activities. The JFIU will maintain close collaboration with all stakeholders to address the emerging challenges.

與本港持份者合作 Local Cooperation with Stakeholders

對打擊洗錢及恐怖分子資金籌集的社區而言，跨機構合作非常重要，本組亦不遺餘力，務求各方可合作無間。在策略層面，政府決策局、監管機構及專業團體就修訂有關可疑交易舉報機制的政策、法例及／或指引會向本組人員徵詢意見。本組亦協助整理可疑交易報告或其他有關打擊洗錢及恐怖分子資金籌集的統計數字，供政府高層會議討論。在行動層面，本組與不同執法機關和財富情報單位的財富情報交流頻密而迅速，在情報、調查和追討資產方面提供支援。

The JFIU treasures and seeks to enhance interagency collaboration within the AML/CFT community. At the strategic level, government bureau, regulatory authorities and professional bodies consult with the JFIU on changes of policies, legislation and/or guidelines that touch on the suspicious transaction reporting regime. The JFIU also assists in collating STRs or other AML/CFT-related statistics for the deliberation in high-level governmental meetings. At the operational level, the JFIU provides intelligence, investigative and asset-recovery support through frequent and responsive financial intelligence exchange with various LEAs and FIUs.

與舉報可疑交易的機構定期聯繫 Regular Liaison with STR Reporting Entities

香港的金融服務方便快捷，易於使用，或惹罪犯、恐怖分子及其聯繫人士覬覦，藉以清洗犯罪得益或進行恐怖分子資金籌集活動。因此，本組視私營機構為打擊洗錢及恐怖分子資金籌集制度的第一道防線。本組委派指定的聯絡人員跟進舉報可疑交易的主要機構的查詢，以加強與私營機構的協調及溝通。

縱使困難重重，時刻充滿挑戰，聯合財富情報組仍堅定不移，致力為公私營機構建立行之有效的合作伙伴關係。本組亦定期與相關政府決策局、監管機構、金融機構及儲值支付工具持牌人進行視像會議，就舉報可疑交易涉及共同關注的議題討論和提出意見，並就政策及需作優先處理的項目進行交流。因應行動需要，我們會於本組網頁限制區的告示欄發出警示，公布最新的罪案趨勢及所得觀察。

The JFIU recognises the private sectors as the first line of defence in the AML/CFT regime as criminals, terrorists and their associates are inclined to make use of the easily accessible financial services in Hong Kong to launder proceeds of crime or perform Terrorist Financing. To better the coordination and communication between the JFIU and private sectors, designated liaison officers are assigned to follow up enquiries raised by major STR reporting entities.

Despite in hard time, the JFIU is committed to build and maintain an effective public-private partnership. The JFIU also regularly holds video conferences with relevant government bureaus, regulatory authorities, FIs and SVF licensees to discuss and advise on matters of common interest in suspicious transaction reporting, share views on policy and operational priorities. On an ad-hoc basis depending on the operational needs, alerts have been published on the noticeboard at the secure area of the JFIU's website on latest crime trends and observations from the JFIU.

FIVE

WORLDWIDE FINANCIAL INTELLIGENCE EXCHANGE

國際財富情報交流

現今科技一日千里，連繫世界各地從容便易，國際間有效而緊密的合作無疑是成功打擊跨國清洗黑錢和恐怖分子資金籌集的關鍵。本組的成功有賴全球各地的財富情報單位奮力支持情報交流工作。

在2016年至2019年間，本組接獲外地及對外發出的交換情報書信往來數目顯著增長，反映各地財富情報單位互相支援，合作愈趨頻繁。

新型冠狀病毒肆虐，為世界各地帶來前所未有的挑戰，財富情報單位間的合作亦受影響。2020年，本組與各地的交換情報書信數量較2019年下跌

With the ease of international connectivity, there is no doubt that effective and enhanced international cooperation is the key to success in combating transnational money laundering and terrorist financing. The JFIU could have never been so successful without the unfailing support from FIUs worldwide in exchanging intelligence.

Between 2016 and 2019, there has been a growth in both the incoming and outgoing correspondences, marking more frequent cooperation and mutual support among FIUs.

The outbreak of Coronavirus Disease 2019 (COVID-19) has posed extraordinary challenges in almost every part of the world and brought an impact on the partnership. In 2020, JFIU recorded a decrease in the number of correspondences exchanged.

本組與世界各地財富情報單位交換財富情報的統計數字 Financial Intelligence Exchange between the JFIU and FIUs Worldwide

年份 Year		2016	2017	2018	2019	2020
接獲外地的交換 情報書信往來次數 Total No. of Incoming Correspondences	(埃格蒙特組織) (Egmont Group)	794	991	1,197	1,283	924
	(非埃格蒙特組織) (Non-Egmont Group)	43	154	123	209	177
接獲總數 Incoming Total		837	1,145	1,320	1,492	1,101
對外發出的交換 情報書信往來次數 Total No. of Outgoing Correspondences	(埃格蒙特組織) (Egmont Group)	866	990	1,036	1,135	933
	(非埃格蒙特組織) (Non-Egmont Group)	293	358	290	243	330
發出總數 Outgoing Total		1,159	1,348	1,326	1,378	1,263

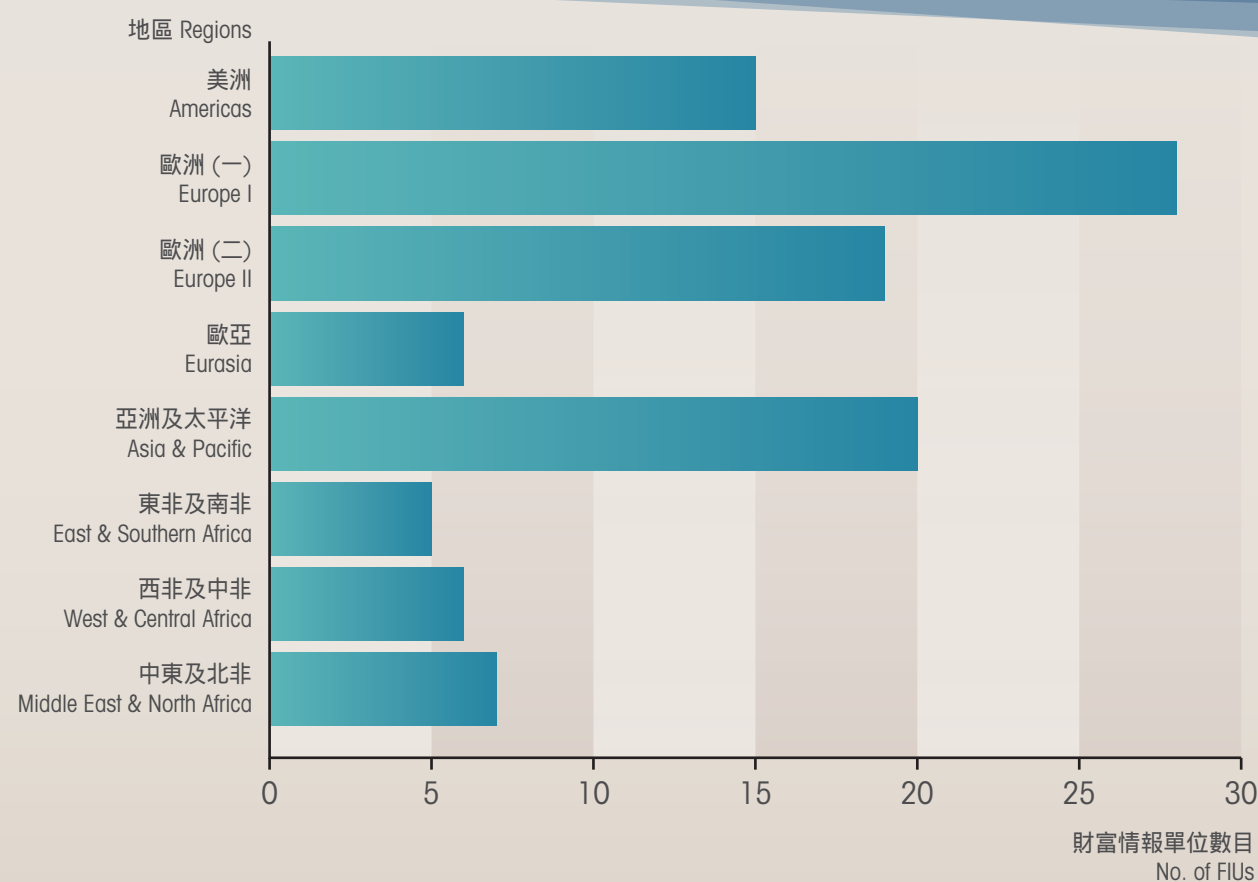
(*非埃格蒙特組織成員主要包括非埃格蒙特組織的財富情報單位及偶爾是其他海外執法機關)
(*Non-Egmont Group members include mainly non-Egmont FIU(s) and occasionally other overseas LEAs)

2020年，本組與全球106個埃格蒙特組織成員及3個非埃格蒙特組織成員交換財富情報。各大洲所涉的財富情報單位數目如下：

In 2020, the JFIU exchanged financial intelligence with 106 Egmont Group members and three non-Egmont Group members across continents. The number of FIUs from each continent being engaged is shown as follows:

2020年與本組交換財富情報的埃格蒙特組織及非埃格蒙特組織單位數目（按地區劃分*）

Number of Egmont and Non-Egmont FIUs Exchanged Financial Intelligence with the JFIU (By Regions*) in 2020



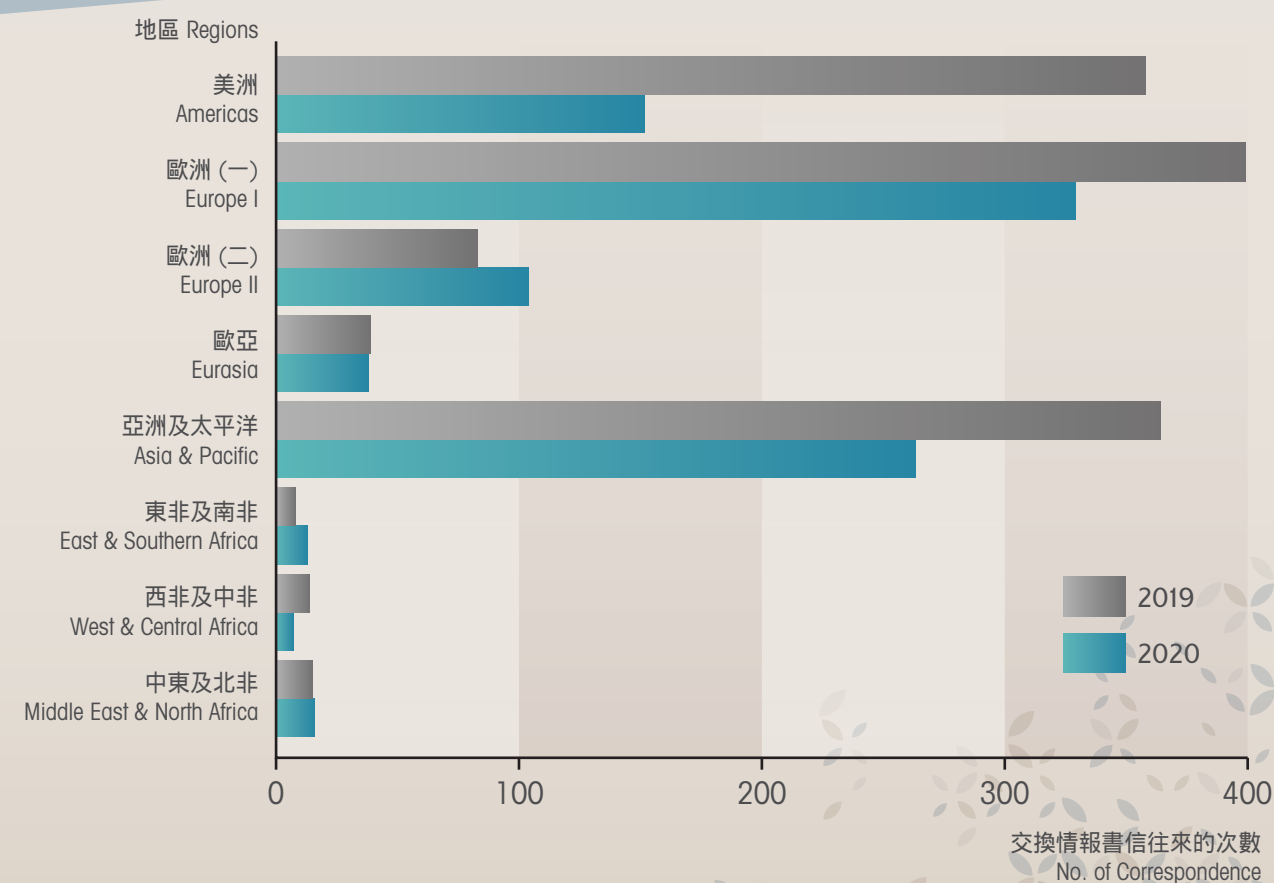
(*參考埃格蒙特組織採用的地區分類)
(*with reference to categorization of regional groups adopted by the Egmont Group)

如下圖所示，本組與歐洲(一)地區的成員交換情報的次數較頻繁。全年在各地區接獲的交換情報書信往來次數共錄得924次，而歐洲(一)地區的相關書信往來總數達330次，高踞各區首位。綜觀2020年所接獲的交換情報書信往來次數，歐洲(二)地區的相關書信往來數目，與2019年相比，錄得顯著升幅。

As shown from the graph below, JFIU has frequent exchange of intelligence with members from Europe I in 2020, of which 330 out of 924 incoming correspondences were received from the Region. The year of 2020 recorded a significant increase in incoming correspondences with Europe II, as compared to 2019.

2019年及2020年接獲埃格蒙特組織成員的交換情報書信往來次數

Number of Incoming Correspondence with Egmont Group Members in 2019 and 2020



2020年與財富情報單位 交換情報的趨勢

Trend of Information Exchange with FIUs in 2020

本組近年接收和發布的資料和情報均愈見複雜。不論是接獲外地及對外發出的交換情報要求，還是自發分享的情報，所涉罪案尤以訛騙及洗錢兩類較為常見。

The JFIU observed increasing complexity of information and intelligence received and shared in the past few years. Fraud and Money Laundering are the two more prevalent crime types of both incoming and outgoing requests, as well as incoming and outgoing spontaneous sharing of information.

	1 st 第一位	2 nd 第二位	3 rd 第三位	4 th 第四位	5 th 第五位
接獲要求索取情報的性質 Nature of Incoming Requests	洗錢 Money Laundering (244)	訛騙 Fraud (145)	可疑交易 Suspicious Transaction (84)	稅務罪行 Tax Crime (28)	貪污 Corruption (17)
接獲自發分享情報的性質 Nature of Incoming Spon. Sharings	訛騙 Fraud (118)	洗錢 Money Laundering (60)	可疑交易 Suspicious Transaction (45)	詐騙及內幕交易 Deception and Insider Trading (8)	
	1 st 第一位	2 nd 第二位	3 rd 第三位	4 th 第四位	5 th 第五位
發出要求索取情報的性質 Nature of Outgoing Requests	洗錢 Money Laundering (43)	訛騙 Fraud (28)	詐騙 Deception (13)	內幕交易及販運 Insider Trading and Trafficking (2)	
自發分享情報的性質 Nature of Outgoing Spon. Sharings	訛騙 Fraud (35)	洗錢 Money Laundering (23)	內幕交易 Insider Trading (21)	詐騙 Deception (18)	稅務罪行 Tax Crime (10)

*() 要求索取 / 分享情報的數目
*() denotes number of requests/ sharing

SIX6

CASE STUDIES AND TYPOLOGIES

案件分析及類型學

案例 1
Case 1

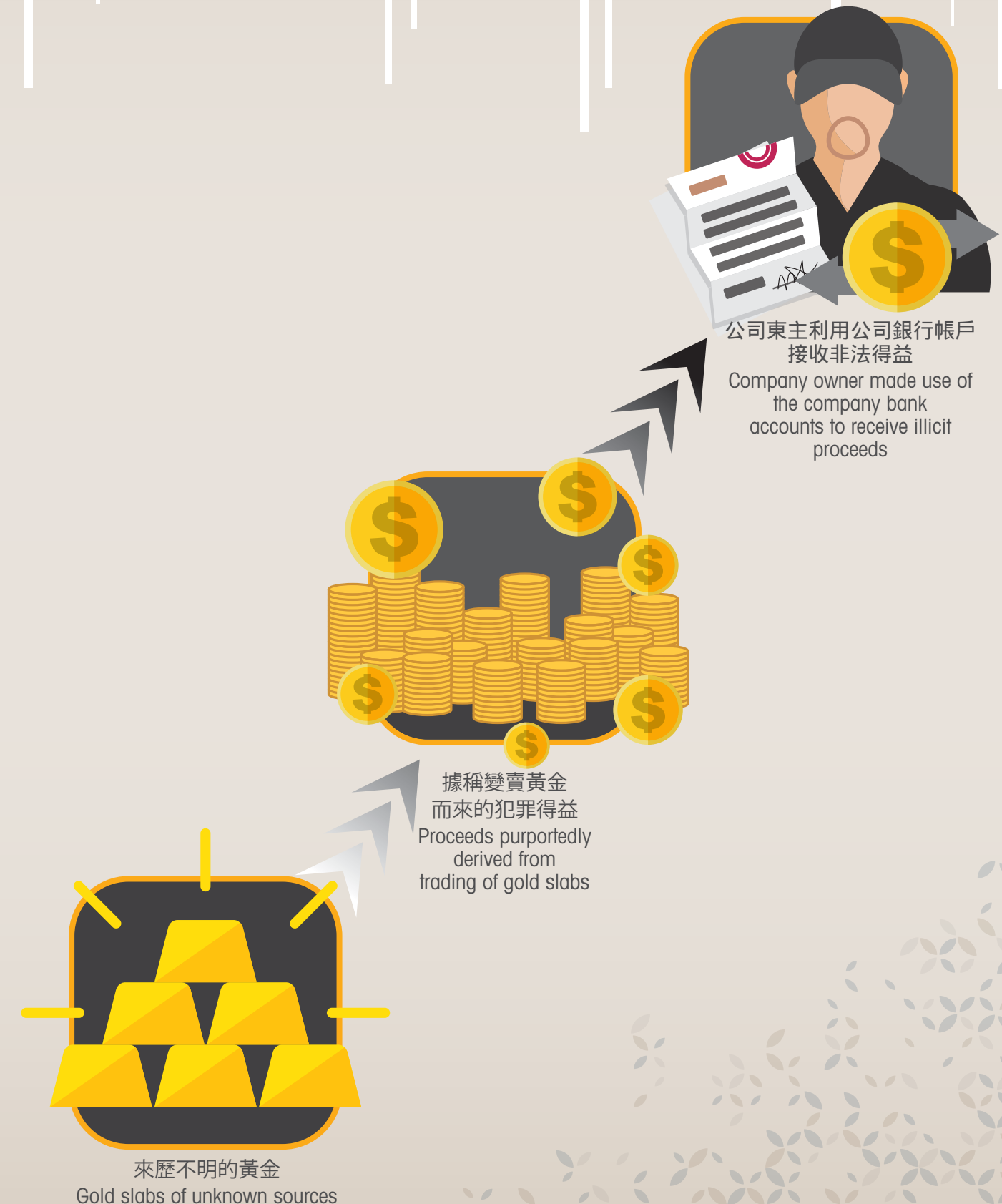
有關變賣來源不明黃金
而獲取得益的洗錢案

Money Laundering in relation to Gold Trading Proceeds of Unknown Sources

2016年11月，海關對一名個別人士全權擁有的兩間公司展開調查。聯合財富情報組的財富資料顯示，由該等公司持有的銀行帳戶曾接收大量來源不明的存款。經深入的財富調查後發現，帳戶具有典型的清洗黑錢模式，且所涉交易款額與公司東主的背景不符。雖然涉案東主聲稱存款為變賣黃金而來的得益，卻無法解釋黃金來源。涉案東主於2017年12月被海關拘捕，並於2021年2月被控兩項洗黑錢罪，共清洗3.4億港元。

In November 2016, the C&ED commenced an investigation against two companies solely owned by an individual. Financial intelligence from the JFIU suggested that the bank accounts held by these companies had received significant sums of deposits with suspicious origins. Extensive financial investigation revealed the accounts exhibited typical money laundering patterns and that the accounts turnovers were incommensurate with the company owner's background. While the owner claimed the deposits were derived from the trading of gold slabs, the sources of the gold slabs could not be explained. In December 2017, the C&ED arrested the company owner. In February 2021, the individual was charged with two counts of 'Money Laundering' with the total laundered amount of HKD 340 million.

案例1：有關變賣來源不明黃金而獲取得益的洗錢案 Case 1: Money Laundering in relation to Gold Trading Proceeds of Unknown Sources



案例 2
Case 2

有關以不良營商手法
騙取得益的洗錢案

Money Laundering in relation to Proceeds of Unfair Trade Practices

2019年6月，海關對一個針對在港外籍家庭傭工的本地集團進行調查。該集團管理兩家訛稱持牌的職業介紹所，並稱可安排外籍家庭傭工的朋友在港工作。在收取介紹費用後，介紹所從未提供任何實際服務。聯合財富情報組的財富情報顯示，介紹所收取的介紹費用最終被轉帳至介紹所東主持有的個人銀行帳戶。2020年，介紹所東主及其有關聯人士同被控作出虛假商品說明罪以及洗黑錢罪。

In June 2019, the C&ED conducted an investigation against a local syndicate preying on foreign domestic helpers in Hong Kong. The syndicate managed two agencies, which claimed to be licensed and that they could arrange the friends of the foreign domestic helpers to work in Hong Kong. After receiving placement fees, the agencies never provided any actual services. Financial intelligence from JFIU showed that the placement fees received by the agencies were eventually deposited into the personal bank account held by the agencies' owner. In 2020, the agencies' owner and his associates were charged with 'False Trade Descriptions' and 'Money Laundering'.

案例2：有關以不良營商手法騙取得益的洗錢案 Case 2: Money Laundering in relation to Proceeds of Unfair Trade Practices



案例 1
Case 1

針對利用儲值支付工具的外圍賭博集團而展開的行動

Operation against a
Bookmaking Syndicate
Exploiting Stored
Value Facilities (SVFs)

警方對一個外圍賭博集團展開調查。該集團在2017至2019年間，利用儲值支付工具帳戶在香港清洗共1億3,380萬港元非法資金。根據聯合財富情報組協助進行的深入財富調查所顯示，該集團透過儲值支付工具平台的傀儡帳戶網絡，接收和完成來自海外非法賭博網站的投注交易。該等非法資金繼而經持牌金錢服務經營者轉帳至其他傀儡銀行帳戶，其後由運鈔者提取兌現。警方於2020年年初拘捕36名集團成員，並扣押總值360萬港元的資產以待沒收。

The Police commenced an investigation against a bookmaking syndicate. Between 2017 and 2019, the syndicate laundered illicit funds totalling HKD 133.8 million via Stored Value Facilities (SVFs) accounts in Hong Kong. Intelligence from the JFIU assisted in an intensive financial investigation, which revealed a network of stooge SVF accounts used by the syndicate for receiving and settling betting transactions stemming from an overseas illegal gambling website. The illicit funds were then transferred to other stooge bank accounts via licensed money service operators and subsequently cashed out by the money couriers. In early 2020, 36 syndicate members were arrested and HKD 3.6 million worth of financial assets were withheld pending confiscation.

案例1：針對利用儲值支付工具的外圍賭博集團而展開的行動
Case 1: Operation against a Bookmaking Syndicate Exploiting Stored Value Facilities (SVFs)



案例 2
Case 2

針對跨境清洗黑錢活動 展開以情報主導的調查

Intelligence-led Investigation against Cross-Boundary Money Laundering Activity

聯合財富情報組的情報顯示，一對外地情侶在香港的聯名銀行帳戶曾接收與多宗詐騙案件有關的犯罪得益，總值1.05億港元。警方因應聯合財富調查組的情報展開調查，發現涉案情侶因涉及貴重金屬非法交易，非法資金流入其香港銀行帳戶，曾於2012年在其定居國家被定罪。警方展開法律程序以沒收其銀行帳戶內的1.05億港元。二人透過其香港法律代表報稱金錢來自合法途徑，但法院拒絕接受解釋。2020年8月，法庭頒令沒收該1.05億港元。

Intelligence from JFIU indicated that an overseas couple's joint bank account in Hong Kong had received proceeds from multiple fraud cases totalling HKD 105 million. In response to JFIU's intelligence, the Police commenced an investigation and discovered the couple had been convicted in their residing country in 2012 for illegal trading of precious metals with illicit funds flowed into their bank account in Hong Kong. The Police initiated a Court proceeding to confiscate the HKD 105 million withheld in their bank account. Through their legal representatives in Hong Kong, the couple claimed the monies were gained from legitimate means, but the Court rejected their explanation. In August 2020, the court ordered the confiscation of the HKD 105 million.

案例2：針對跨境清洗黑錢活動展開以情報主導的調查 Case 2: Intelligence-led Investigation against Cross-Boundary Money Laundering Activity



2012年年初在其定居國家同被拘捕和定罪
Arrested in their residing country and convicted in early 2012



轉匯非法貴重金屬交易的犯罪得益至銀行帳戶
Transferred crime proceeds from illegal trading of precious metals to bank account



展開潛逃者法律程序以沒收1.05億港元犯罪得益
Confiscation of HKD105M via Absconder Proceedings

案例 3
Case 3

針對賣淫集團展開的行動 Operation against a Vice Syndicate

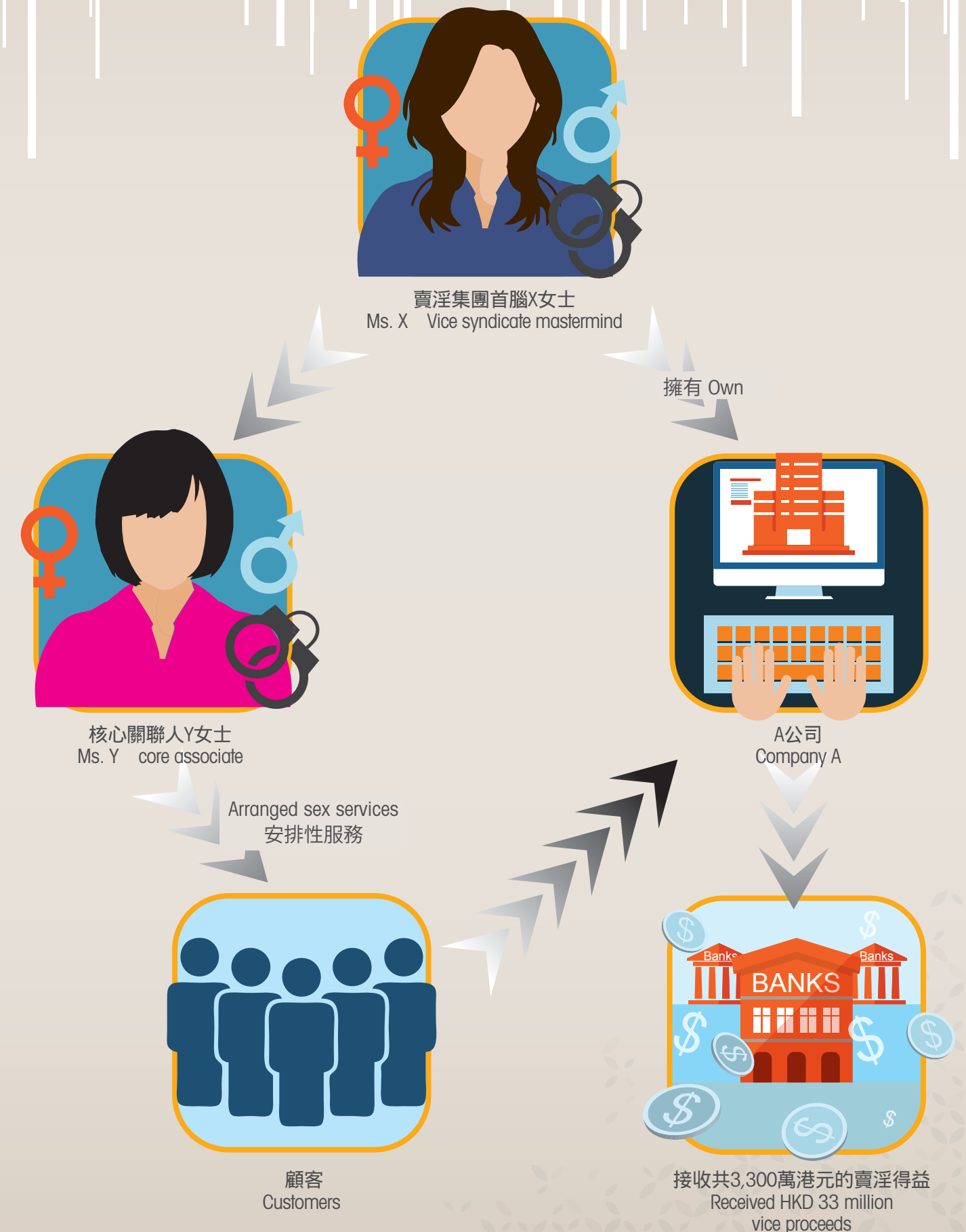
2009至2018年間，有集團在香港經營多個提供性服務的網站。聯絡工具以首腦X女士全權擁有的A公司名義登記。經調查揭示X女士在經營電話中心，而其核心關聯人Y女士則負責接聽預約來電，並為顧客安排娼妓。聯合財富情報組的財富情報證實賣淫得益被轉帳至由A公司持有的銀行帳戶。

X女士和Y女士因接收3,300萬港元賣淫得益，被控「串謀依靠他人賣淫的收入為生」罪及「洗黑錢」罪。2020年10月，二人同被定罪及判監，並遭沒收總值3,300萬港元的資產。

Between 2009 and 2018, a syndicate operated various websites offering sexual services in Hong Kong. The contact means were registered under Company A, which was solely owned by the mastermind, Ms. X. Investigation revealed that Ms. X ran a call centre and her core associate, Ms. Y, was responsible for booking calls and the arranging prostitutes. Financial intelligence from JFIU established that the prostitution proceeds were deposited into the bank accounts held by Company A.

Ms. X and Ms. Y were charged with 'Conspiracy to live on earning of the prostitution of others' and 'Money Laundering' for receiving HKD 33 million vice proceeds. In October 2020, the duo was convicted and sentenced to imprisonment terms with HKD 33 million worth of financial assets confiscated.

案例3：針對賣淫集團展開的行動 Case 3: Operation against a Vice Syndicate



案例 4 Case 4

針對本地洗錢集團展開的行動

Operation against a Local Money Laundering Syndicate

毒品調查科財富調查組根據線報，對一個本地集團展開財富調查。該集團經社交媒體招攬傀儡，成立不同公司和開立公司銀行帳戶，以接收源自海外投資騙案的犯罪得益。

分析揭露在2015年12月至2016年8月期間，該集團利用超過50個銀行帳戶清洗逾1.39億港元犯罪得益。

調查揭發集團招攬傀儡成立涉案公司，所有公司的商業地址均位處本港工廠大廈的同一地點，卻報稱從事不同行業。從疑犯銀行帳戶所觀察的交易模式及交易金額均極為可疑，並明顯與各人的個別財務背景不相符。

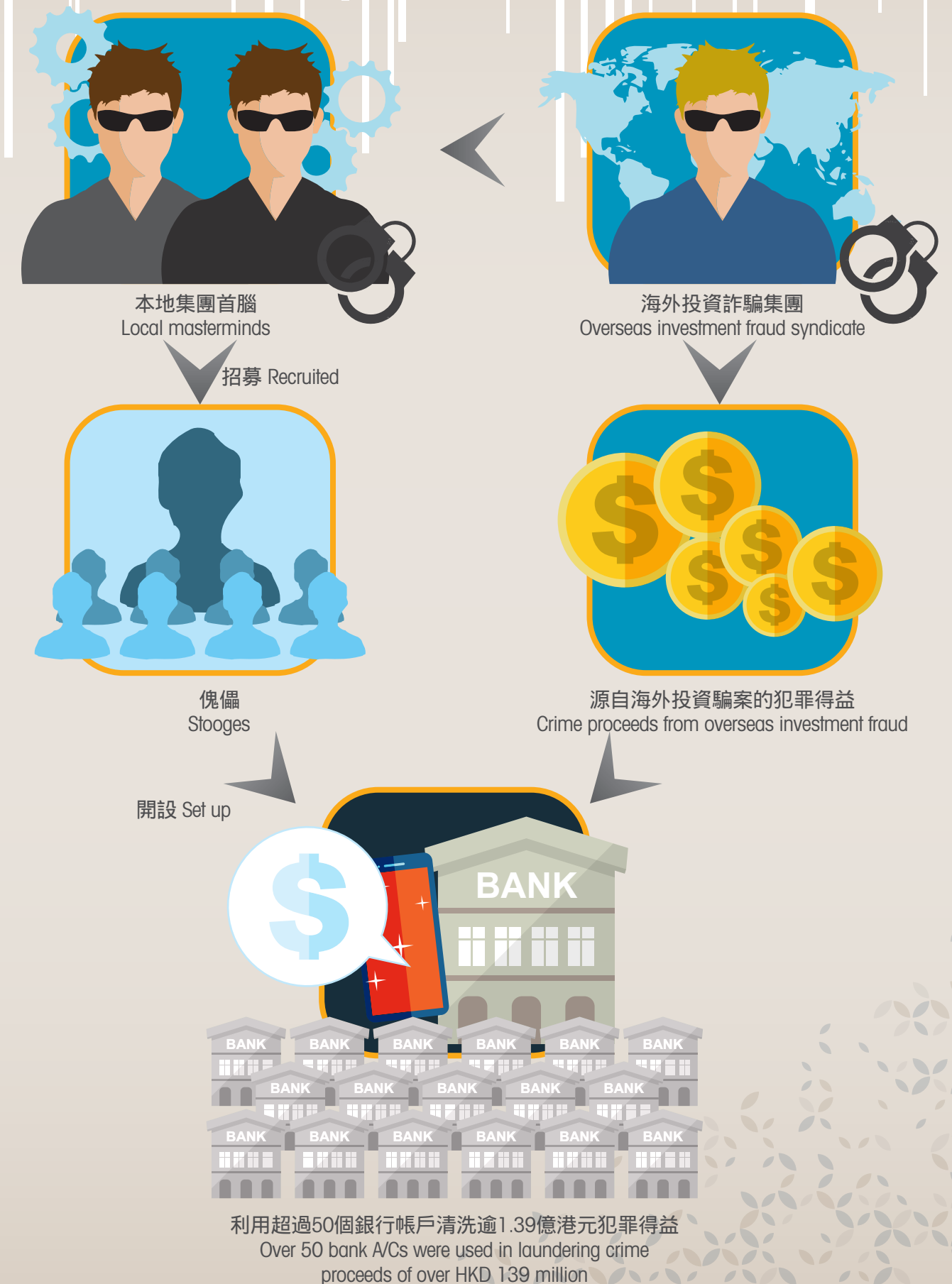
行動於2017年展開，共11名集團成員被捕，包括兩名首腦及其他傀儡。兩名首腦及六名傀儡被控共12項「串謀洗黑錢」及兩項「洗黑錢」罪，而審訊將於2021年年末在區域法院進行，並限制600萬港元的懷疑犯罪得益。

Acting on intelligence, the FID NB initiated financial investigation against a local syndicate which hired stooges via social media to set up different companies and corporate bank accounts for receiving crime proceeds stemming from overseas investment frauds. Analysis unveiled that over 50 bank accounts were used by the syndicate in laundering crime proceeds of over HKD 139 million between December 2015 and August 2016.

Investigation revealed that the involved companies were set up by stooges recruited by the syndicate. The companies shared the same business address situated in an industrial building in Hong Kong, but were alleged to be engaged in different industries. The transaction patterns and the turnover volumes observed in the bank accounts of the suspects were suspicious and clearly incommensurate with their individual's financial background.

In 2017, the operation turned overt and a total of 11 syndicate members, including the two masterminds and other stooges were arrested. A total of 12 charges of 'Conspiracy to Money Laundering' and two charges of 'Money Laundering' were laid against the two masterminds and six stooges with a trial scheduled to be held at District Court in late 2021 whilst HKD 6 million of the defendants assets was restrained.

案例4：針對本地洗錢集團展開的行動 Case 4: Operation against a Local Money Laundering Syndicate



案例 5
Case 5

與販毒得益有關的洗錢案 Money Laundering in relation to Proceeds of Drug Trafficking

2018年5月，毒品調查科以「販運危險藥物」罪名拘捕二人，並檢獲共6,072克海洛英、販毒工具、載有毒品交易記錄的筆記本，以及超過200萬港元現金。

由於檢獲的資金與二人收入並不相符，警方遂針對被捕人士進行財富調查，並扣押其中一名被捕人的200萬港元銀行存款。

財富調查揭示銀行帳戶的大量交易和大額現金存款，相信為販毒得益。兩名被捕人士其後被控「販運危險藥物」以及兩項「洗黑錢」罪。審訊將於2021年年末在原訟法庭進行。同時，法庭頒令限制被告的400萬港元資產。

In May 2018, Narcotics Bureau arrested two persons for 'Trafficking in a Dangerous Drug' with a total of 6,072 grammes of cocaine, drug trafficking paraphernalia, a notebook containing drug transaction records and cash over HKD 2 million seized.

The funds seized were incommensurate with the financial profiles of the duo. Financial investigation was thus conducted against the arrested persons and further HKD 2 million bank balance of one of the arrested persons was withheld.

Financial investigation revealed that substantial turnovers and significant amount of cash deposits were observed in the bank account which were believed to be drug proceeds. The two arrested persons were subsequently charged with two charges of 'Money Laundering' in addition to 'Trafficking in a Dangerous Drug'. The trial is scheduled to be held at the Court of First Instance in late 2021 whilst HKD 4 million of the defendant's assets was restrained.

案例5：與販毒得益有關的洗錢案 Case 5: Money Laundering in relation to Proceeds of Drug Trafficking



兩名毒販於2018年5月被捕
In May 2018, two drug traffickers were arrested



銀行帳戶的大量交易和大額現金存款
Substantial turnovers and significant amount
of cash deposits in the bank account



與被捕人報稱的收入不相符
Incommensurate with
financial profiles of the arrested drug traffickers



頒發限制令限制400萬港元資產
Restraint Order against HKD 4 Million was issued

案例6
Case 6

與內地展開聯合行動，利用上游罪行證據進行財富調查，處理已查明的毒品經紀及其妻子

Joint operation with the Mainland and Use of financial investigation with The proof of predicates to tackle Identified drug broker and his wife

在一個跨境聯合行動中，A先生被發現安排漁船從X司法管轄區偷運毒品到其他司法管轄區。財富調查顯示A先生及其妻子操控本港八個帳戶，在2004至2013年間的總交易金額為8,670萬港元。2016年4月，A先生及妻子因干犯「洗黑錢」罪在香港被捕。行動中，在二人的住所和保管箱檢獲共計512萬港元的現金和貴重物品。

2018年1月，在Y司法管轄區附近的公海截獲一艘用作販運大量冰毒及可卡因的船隻。該艘船被焚，燒毀船上高達1,000公斤的危險藥物。A先生因負責安排該船運在本港被捕。2018年7月，法庭頒下限制令，限制A先生和妻子總值2,913萬港元的資產，包括778萬港元銀行存款、512萬港元現金、244萬港元貴重物品，以及價值1,380萬港元的兩項物業。

2021年3月，A先生及妻子在區域法院分別被判干犯兩項及六項「洗黑錢」罪，共清洗4,890萬港元犯罪得益。A先生及妻子分別被判監43個月及66個月。有關沒收共2,913萬港元資產的法律程序仍在進行。

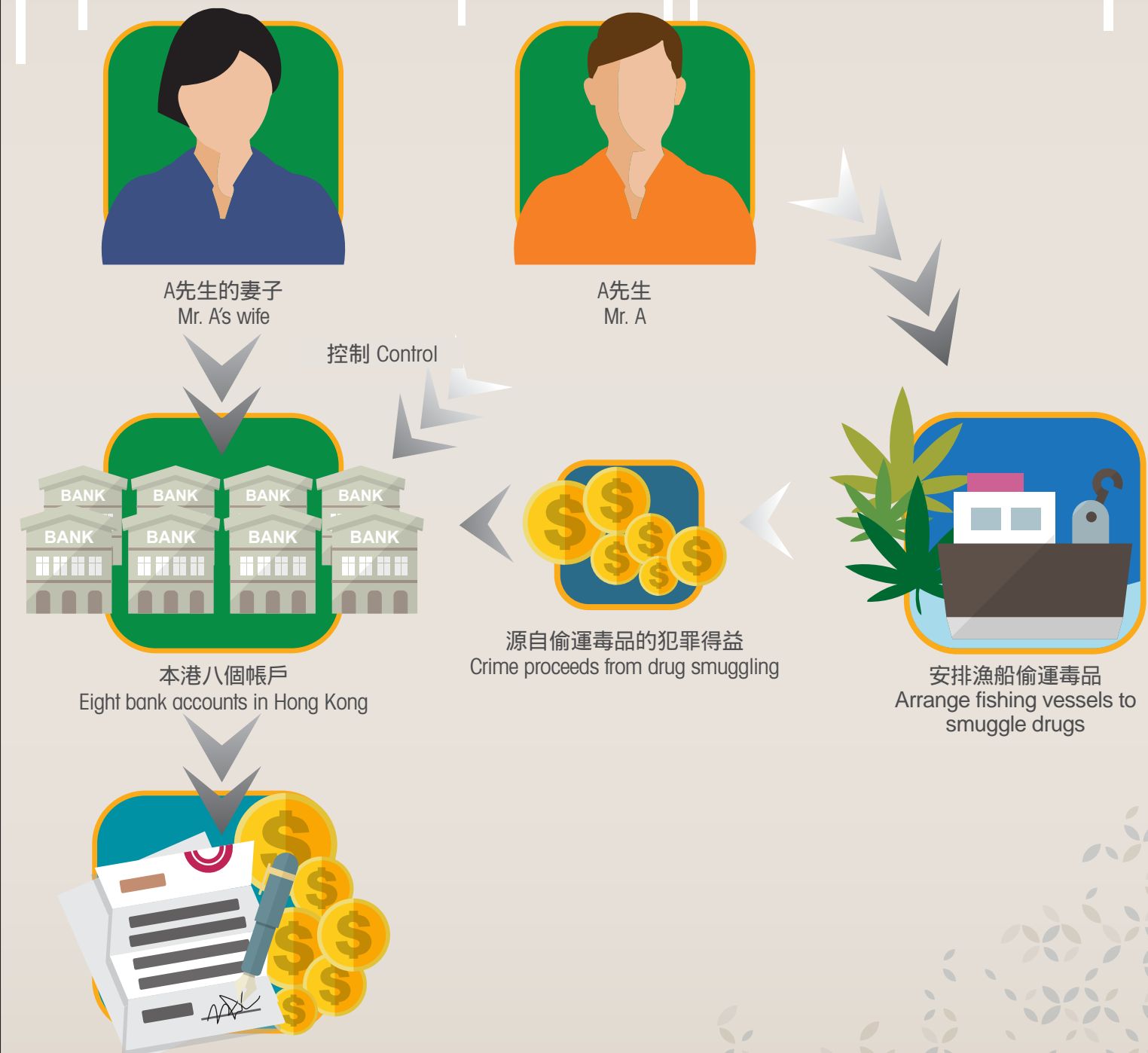
In the course of a cross-border joint operation, Mr. A was identified to have arranged fishing vessels to smuggle drugs from Jurisdiction X to other jurisdictions. Financial investigation showed that Mr. A and his wife controlled eight accounts in Hong Kong, which had a total turnover of HKD 86.7 million between 2004 and 2013. In April 2016, Mr. A and his wife were arrested for 'Money Laundering' in Hong Kong. Cash and valuables totalling to HKD 5.12 million were seized at their residences and safe deposit boxes.

In January 2018, a vessel used for trafficking a large amount of ICE and Cocaine was intercepted at the open waters near Jurisdiction Y. The vessel was set ablaze with up to 1,000kg of dangerous drugs burnt. Mr. A was arrested in Hong Kong for arranging the shipment. In July 2018, Restraint Order was issued against Mr. A and his wife assets totalling to HKD 29.13 million, including bank balances of HKD 7.78 million, HKD 5.12 million in cash, valuables at HKD 2.44 million and two real estate valued at HKD 13.8 million.

In March 2021, Mr. A and his wife were convicted of two counts and six counts of 'Money Laundering' at the District Court respectively for laundering HK\$ 48.9 million crime proceeds. Mr. A and his wife were sentenced to 43 months' imprisonment and 66 months' imprisonment respectively. Legal proceeding for confiscation of a total of HKD 29.13 million is ongoing.

案例6：與內地展開聯合行動，利用上游罪行證據進行財富調查，處理已查明的毒品經紀及其妻子

Case 6: Joint Operation with the Mainland and use of financial investigation with the proof of predicates to tackle identified drug broker and his wife



A先生及妻子分別被判監43個月及66個月，共2,913萬港元的資產有待沒收
Mr. A and his wife were sentenced to 43 months' imprisonment and 66 months' imprisonment respectively; assets amounting to HKD 29.13 million is available for confiscation

案例 7
Case 7

與販毒得益有關的洗錢案

Money Laundering in relation to Proceeds of Drug Trafficking

毒品調查科於2018年4月展開的行動中，以「栽植大麻植株」及「串謀栽植大麻植株」罪分別拘捕販毒集團成員A先生及其同謀，並檢獲共1,205株大麻類植物，重約60公斤。

財富調查揭示A先生及其母親B女士名下的個人銀行帳戶均有可疑存款，相信為販毒得益。2018年6月，二人因干犯「洗黑錢」罪被捕。證據顯示A先生操控其個人及B女士的銀行帳戶，清洗超過700萬港元。A先生於2021年6月被判干犯兩項「洗黑錢」罪，以及判監32個月。

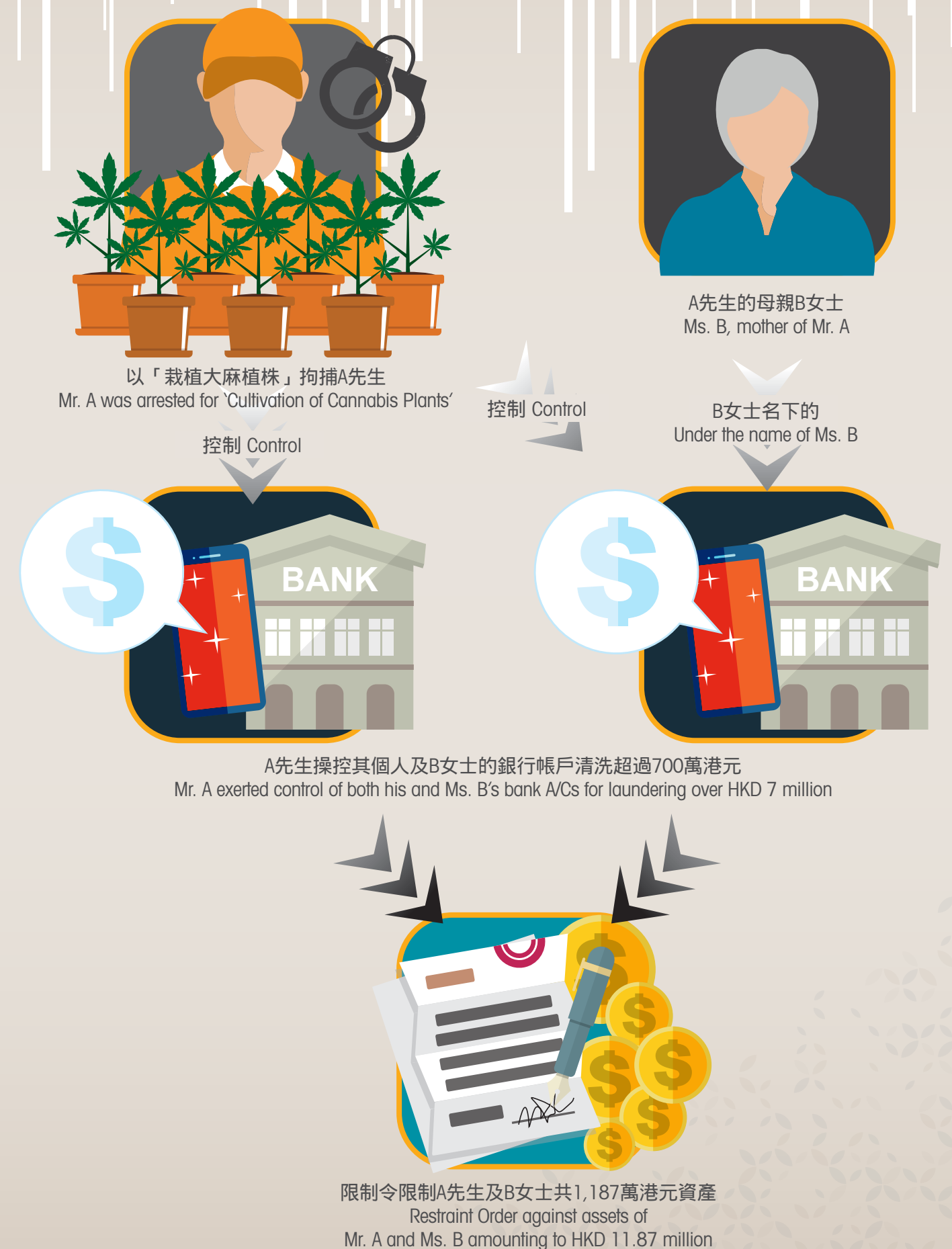
2020年10月，法庭頒令限制A先生及B女士共1,187萬港元資產，包括110萬港元銀行存款，以及價值1,077萬港元的兩項物業。相關沒收法律程序仍在進行。

During an operation conducted by officers of Narcotics Bureau in April 2018, drug trafficking syndicate member Mr. A and his accomplice were arrested for 'Cultivation of Cannabis Plants' and 'Conspiracy to Cultivation of Cannabis Plants' respectively with a total of 1,205 pots of cannabis plants (around 60kg in weight) seized.

Financial investigation revealed suspicious deposits which were believed to be drug proceeds in the personal bank accounts under the names of Mr. A and his mother Ms. B. In June 2018, the duo was arrested for 'Money Laundering'. Evidences showed that Mr. A exerted control over both his and Ms. B's bank accounts for laundering over HKD 7 million. Mr. A was convicted of two counts of 'Money Laundering' and was sentenced to 32 months' imprisonment in June 2021.

In October 2020, assets of Mr. A and Ms. B amounting to HKD 11.87 million, including bank balances of HKD 1.1 million and two real estate valued at HKD 10.77 million, were restrained and confiscation procedure is ongoing.

案例7：與販毒得益有關的洗錢案 Case 7: Money Laundering in relation to Proceeds of Drug Trafficking



SEVEN 7

INTERNATIONAL COOPERATION AND REPRESENTATION

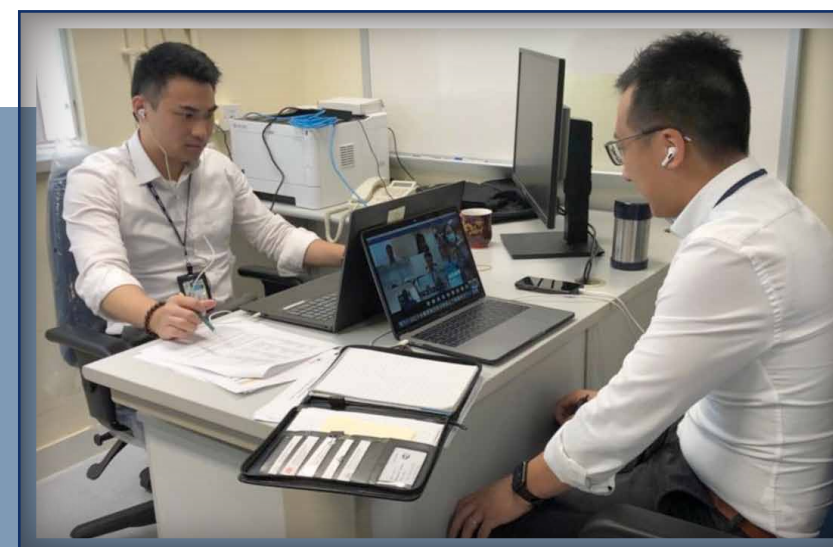
國際合作及參與

THE 埃格蒙特組織 (由世界各地的財富情報單位組成) EGMONT GROUP OF FIUS (EGMONT GROUP)

埃格蒙特組織於1995年4月成立，是一個現有166名成員的國際組織，負責加強全球財富情報單位在交換情報、培訓和分享專業知識等方面的合作，共同推行打擊洗錢及恐怖分子資金籌集的措施。

香港自1996年起成為埃格蒙特組織成員，致力展現其阻截和打擊跨國洗錢及恐怖分子資金籌集的決心。

The Egmont Group consists of 166 members and is an international organization established in April 1995 with a mandate to improve cooperation on information exchange, trainings and expertise between FIUs around the world engaging in AML/CFT measures. Since 1996, Hong Kong joined the Egmont Group and exemplified its determination in deterring and combatting transnational ML and TF.



本組人員於2020年6月出席埃格蒙特組織網上會議。

JFIU officers attended the Egmont Group Asia and Pacific Regional Group Virtual Meeting in June 2020.

國際研討會及會議 INTERNATIONAL CONFERENCES AND MEETINGS

儘管新型冠狀病毒的肆虐，但本組於打擊洗錢及恐怖分子資金籌集的決心從未動搖。

於2020年本組代表亦出席各類網上研討會及會議，以擴展網絡，並就全球洗錢及恐怖分子資金籌集趨勢及相互評核的籌備工作，廣納其他司法管轄區的意見以作深入了解。

Despite the outbreak of the COVID-19 pandemic, the determination of JFIU in enhancing the mutual rapport and facilitating direct discussion on topical AML/CFT issues has never been shaken. In 2020, representatives from the JFIU also attended various conferences and meetings virtually to extend network and gain insights from other jurisdictions into global ML/TF trend and ME preparation work.



本組人員於2020年12月出席內地與香港、澳門特區三地金融情報組織業務交流會。

In December 2020, JFIU officers attended the joint FIUs meeting with China and Macau.

EIGHT 8

Hong Kong Money Laundering and Terrorist Financing Risk Assessment

香港洗錢及恐怖分子 資金籌集風險評估

香港洗錢及恐怖分子 資金籌集風險評估

Hong Kong Money Laundering and Terrorist Financing Risk Assessment

洗錢及恐怖分子資金籌集風險評估工作由警務處轄下的風險評估小組協助進行，並由財經事務及庫務局主導的洗錢及恐怖分子資金籌集風險評估督導委員會（“督導委員會”）負責監督。督導委員會的成員包括執法監管及決策機關。持續進行的風險評估結果會向打擊清洗黑錢及反恐融資中央統籌委員會（“中央統籌委員會”）報告。中央統籌委員會的主席由財政司司長擔任，負責制定及實施本港打擊洗錢及恐怖分子資金籌集活動的政策。

The ML and TF risk assessment is supported by the Risk Assessment Unit (RAU), and overseen by the Steering Committee of Money Laundering and Terrorist Financing Risk Assessment led by the Financial Services and the Treasury Bureau, and comprised of a range of law enforcement, supervisory and policy agencies. Findings of this on-going risk assessment is reported to the Central Coordinating Committee on Anti-Money Laundering/Counter-Financing of Terrorism, which is Hong Kong's steering body of the formulation and implementation of AML/CFT regime chaired by the Financial Secretary.

在進行洗錢及恐怖分子資金籌集風險評估時，我們採用世界銀行建議的風險評估工具，各個監管機構、執法機關、政府部門及私營機構等持份者作出積極參與。整個過程富有系統性，涉及廣泛諮詢工作，並收集、審視及分析相關定量及定質數據。有關數據包括但不限於執法統計數字、國際犯罪報告及不同的類型學研究。我們在2020年舉行兩場持份者工作坊，工作坊是風險評估的重要基石，可讓各持份者討論和釐清核心要點，確保各持份者對風險評估有充分理解，並鋪展其後的工作。工作坊獲包括執法機構、金融監管機構、政府部門及指定非金融企業及行業規管機構等持份者的積極參與，並由毒品調查科總警司及洗錢及恐怖分子資金籌集風險評估小組人員向各持份者講解香港整體和各行業所面對的風險、分析不同上游罪行引申的洗錢威脅、香港打擊洗錢的能力及最新的洗錢手法。

洗錢及恐怖分子資金籌集風險評估小組為提升處理數據及分析風險方面的能力，已於2020年擴充人手，並更新及優化數據收集的機制和制定相應措施，務求進一步打擊洗錢及恐怖分子資金籌集的犯罪活動。

第二輪洗錢及恐怖分子資金籌集風險評估報告現正進行中。我們會因應相關的國際標準，包括特別組織的建議不斷完善我們的風險評估工作。

Adopting the World Bank Tool, the ML/TF risk assessment is a systematic process that involves extensive consultation, collection, examination and analysis of quantitative and qualitative data, including but not limited to law enforcement statistics, international crime reports and various typologies studies; and engagement with stakeholders of regulators, LEAs, government bodies and private sector entities. To ensure all stakeholders fully understand their duty in risk assessment work and to allow them to discuss and clarify key issues, the RAU conducted two stakeholder workshops in 2020. The two workshops were actively participated by stakeholders included LEAs, financial regulators, government bodies and DNFBPs. The Chief Superintendent of Police from Narcotics Bureau and members of RAU delivered presentations on the ML risk faced by various industries in Hong Kong, threats of ML arising from different predicate offences, the combating ability against ML activities and the latest ML typologies.

To further combat ML/TF activities, RAU has expanded its manpower in 2020 and optimized the data collection mechanism and formulated corresponding measures to enhance our ability to process data and risk analysis.

The second round of Hong Kong ML/TF risk assessment is now under progress. We will continue to improve our risk assessment work in response to relevant international standards, including the recommendations from FATF.



洗錢及恐怖分子資金籌集風險評估小組於2020年舉辦洗錢及恐怖分子資金籌集風險評估工作坊。
RAU organized the 2nd Hong Kong Money Laundering and Terrorist Financing Risk Assessment workshop in 2020.

毒品調查科總警司於洗錢及恐怖分子資金籌集風險評估工作坊向各持份者講解風險評估的要點。
Chief Superintendent of Police of Narcotics Bureau delivered presentation on the features of risk assessment in the workshop.



洗錢及恐怖分子資金籌集風險評估小組人員與持份者互動。
Members of RAU and stakeholders were highly interacted during the workshop.



各持份者在工作坊中就打擊洗錢及恐怖分子資金籌集等相關議題作積極交流。
Stakeholders exchanged views on AML/CFT matters in workshop.



9

Glossary

常用詞彙

常用詞彙

Glossary

ABBREVIATIONS 簡稱	English	中文
AML	Anti-money Laundering	打擊清洗黑錢/ 打擊洗錢
AMLO 「《打擊洗錢條例》」	Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (Cap. 615 of the Laws of Hong Kong)	《打擊洗錢及恐怖分子資金籌集 (金融機構) 條例》 (香港法例第615章)
APG 「亞太反洗錢組織」	Asia/Pacific Group on Money Laundering (www.apgml.org)	亞洲 太平洋反清洗黑錢組織
C&ED	Customs and Excise Department	香港海關
CFT	Counter-Financing of Terrorism	反恐籌資
CO	Companies Ordinance (Cap. 622 of the Laws of Hong Kong)	《公司條例》 (香港法例第622章)
COVID-19	Coronavirus Disease 2019	新型冠狀病病毒
DNFBPs	Designated Non-Financial Businesses and Professions	指定的非金融企業及行業
DTROP	Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405 of the Laws of Hong Kong)	《販毒 (追討得益) 條例》 (香港法例第405章)

ABBREVIATIONS 簡稱	English	中文
Egmont Group	The Egmont Group of Financial Intelligence Units	埃格蒙特組織
FATF 「特別組織」	Financial Action Task Force	財務行動特別組織
FIs	Financial Institutions	金融機構
FID NB	Financial Investigation Division, Narcotics Bureau	毒品調查科財富調查組
FIUs	Financial Intelligence Units	財富情報單位
HKPF	Hong Kong Police Force	香港警務處
ICAC	Independent Commission Against Corruption	廉政公署

ABBREVIATIONS 簡稱	English	中文
INTERPOL	The International Criminal Police Organization	國際刑警組織
JFIU	Joint Financial Intelligence Unit (The Financial Intelligence Unit of Hong Kong)	聯合財富情報組 (香港的財富情報單位)
LEAs	Law Enforcement Agencies	執法機關
MER	Mutual Evaluation Report	相互評核報告
ML	Money Laundering	清洗黑錢/洗錢
MOU	Memorandum of Understanding	諒解備忘錄
OCTB	Organized Crime and Triad Bureau	有組織及三合會調查科
OSCO	Organized and Serious Crimes Ordinance (Cap. 455 of the Laws of Hong Kong)	《有組織及嚴重罪行條例》 (香港法例第455章)

ABBREVIATIONS 簡稱	English	中文
RAU 「風險評估小組」	Money Laundering and Terrorist Financing Risk Assessment Unit	洗錢及恐怖分子資金籌集風險評估小組
STRs	Suspicious Transaction Reports	可疑交易報告
STREAMS	Suspicious Transaction Report and Management System	可疑交易報告管理系統
SVFs	Stored Value Facilities	儲值支付工具
TCSPs	Trust & Company Service Providers	信託或公司服務提供者
TF	Terrorist Financing	恐怖分子資金籌集
UNATMO	United Nations (Anti-Terrorism Measures) Ordinance (Cap. 575 of the Laws of Hong Kong)	《聯合國 (反恐怖主義措施) 條例》 (香港法例第575章)

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