# 2021 聯合財富情報組年報 Joint Financial Intelligence Unit Annual Report







"Tainted money keeps circling around Report to keep Hong Kong safe and sound"
「可疑資金四圍轉舉報黑錢可截斷」

American Express International, Inc. Champion of Anti-Money Laundering Slogan Design Competition 2021 held by Financial Intelligence and Investigation Bureau

# 抱負及使命 Vision and Mission

#### 抱負 Vision

保持聯合財富情 報組為亞太區內 其中一個領先的 財富情報單位 That the Joint Financial Intelligence Unit remains one of the leading Financial Intelligence Units in the Asia/Pacific Region

#### 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 及恐怖分子資金籌集的意 識

That the Joint Financial Intelligence Unit continues to assist the Government in its efforts to protect Hong Kong from illicit activities of money laundering and terrorist financing by:

- Juxtaposing the Joint Financial Intelligence Unit's professional standards with relevant international standards
- Fostering and strengthening cooperation with local and international agencies in the exchange of financial intelligence
- Intelligently analysing suspicious transaction reports received by the Joint Financial Intelligence Unit and making disseminations as appropriate
- Upgrading relevant sectors' awareness and understanding of money laundering and terrorist financing issues

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# 聯合財富情報組主管序言

Message from

the Head of JFIU







# Uncommon minds with common goal, trace the untraceable

## 睿智同心 追跡尋真

## - a new journey, the same vision 堅守初心 創新里程

2021年為香港打擊洗錢及恐怖分子資金籌集創下新里程,亦為聯合財富情報組的發展寫下新一頁。

面對不斷演化的犯案環境,為加強本港打 擊洗錢及恐怖分子資金籌集方面的能力, 聯合財富情報組連同兩個香港警務處轄下 負責打擊洗錢及恐怖分子資金籌集的單 位,即(i)財富調查組(專責調查涉及有組 織罪行的洗錢案件和與恐怖分子資金籌集 相關的案件,以及追查和沒收犯罪得益) 和(ii)洗錢及恐怖分子資金籌集風險評估小 組1(協助財經事務及庫務局進行香港的洗 錢及恐怖分子資金籌集風險評估),於 2021年6月1日起從原屬單位分拆並合併 成為財富情報及調查科。財富情報及調查 科的成立是個重要里程碑,展示了香港警 務處對符合打擊洗錢及恐怖分子資金籌集 的國際標準以及維護本港金融系統的決 心。

聯合財富情報組是財富情報及調查科的重要部分,由香港警務處和香港海關組成,專責接收、分析及發布由金融/非金融業和市民提交的可疑交易報告。疫情下人們

2021 marked a new page of the anti-money laundering / countering financing of terrorism (AML/CFT) journey of Hong Kong and the Joint Financial Intelligence Unit (JFIU).

With a view to strengthening Hong Kong's AML/CFT capabilities in the face of evolving crime landscape, the JFIU, together with other two units responsible for AML/CFT work in the Hong Kong Police Force (HKPF), namely (i) the Financial Investigation Division which specialises in investigating money laundering (ML) relating to organised crimes and terrorist financing (TF), as well as tracing and confiscating crime proceeds; and (ii) the Risk Assessment Unit which assists the Financial Services and the Treasury Bureau (FSTB) in conducting the Hong Kong's ML/TF risk assessment (HRA), were detached from our parent formation and amalgamated to form the Financial Intelligence and Investigation Bureau (FIIB) with effect from 1 June 2021. The establishment of the FIIB is a key milestone which demonstrates HKPF's commitment in fulfilling the international AML/CFT standards and safeguarding the financial system of Hong Kong.

As a key component under the FIIB, the JFIU continued to be the dedicated unit jointly operated by the HKPF and the Customs and Excise Department (C&ED) to receive, analyse and disseminate suspicious transaction reports (STRs) filed by financial/ non-financial professional sectors and members of the public. Partly attributed to

<sup>1</sup> 新架構下,洗錢及恐怖分子資金籌集風險評估小組擴充成為總部,執行額外職務,包括政策及策略分析、為執法部門提供培訓,以及鞏固私營機構打擊洗 錢及恐怖分子資金籌集的能力。

Under the new set-up, the RAU was expanded to form the Headquarters, assuming additional responsibilities such as policy and strategic analysis, training for LEAs and capacity-building for the private sector.

在部門重組下,財富情報及調查科獲分配額外資源,以增加人手進行財富調查及情報蒐集工作,而聯合財富情報組在改善架構後亦主動蒐集情報。2021年,財富情報及調查科積極收集和拓展情報,成功拘捕283名人士。

儘管受制於2019冠狀病毒病疫情實施的 社交限制,財富情報及調查科仍十分重視 與本地及海外持份者保持聯繫、分享專業 知識和交換情報。作為行動計劃的重要一 環,財富情報及調查科持續為外界持份者 舉辦打擊洗錢講座,並在社交限制實施期 間利用數碼基礎建設,繼續舉辦培訓及保 持恆常溝通。為配合財富情報及調查科的 策略,聯合財富情報組與海外相關單位維 持日常交換情報,並透過出席財務行動特 別組織(特別組織)、埃格蒙特組織及國際 刑警組織等國際組織在網上舉辦的全體會 議和研討會等,與世界各地的相關組織保 持緊密聯繫。2021年12月,聯合財富情 報組透過網上簽署儀式,與一個歐洲財富 情報單位就交換財富情報簽訂諒解備忘 錄。

在2019冠狀病毒病疫情下,網絡罪案和金融罪案的數字均大幅上揚。在收緊社交距離措施期間,消費者紛紛轉向網上平台進行經濟及社交活動,有不法分子趁亂犯案,相關騙案涉及的損失金額龐大。因應本港洗錢風險提升,為加強市民的相關意識,財富情報及調查科舉辦了一個前所未

the accelerated and wide-spread application of technology during the pandemic, evolution in the modus operandi, ML typologies and techniques deployed by criminals have been observed. The emerging risks associated with growing prevalence of virtual assets (VAs), and also having regard to their nascent nature and the ease of transfer, have led to an increase in the complexity and diversity in the STRs filed. As always, the JFIU strived to develop useful leads to law enforcement agencies (LEAs) and regulators via assessing STRs with a risk-based approach and disseminating the same. It is axiomatic that the STR dissemination rate reached the record high in 2021.

As part of the restructuring, extra resources have also been allocated to strengthen the manpower of the FIIB in both financial investigation and intelligence gathering. With the enhanced structure, the JFIU conducted proactive intelligence gathering. In 2021, 283 arrests were made by FIIB as a result of our proactive intelligence gathering and cultivation.

Despite the social restrictions imposed in the COVID-19 pandemic, the FIIB persisted to attach great importance to connect, domestically and internationally, with stakeholders on expertise sharing and intelligence exchange. As an integral part of its action plan, the FIIB continuously organised AML seminars for members of external stakeholders. Thanks to the digital infrastructures available, we could maintain the momentum in conducting training and regular liaison while social restrictions were in place. In line with FIIB's strategy, the JFIU maintained close ties with the globe by attending plenaries, conferences, meetings, etc. of international bodies including the Financial Action Task Force (FATF), the Egmont Group and the INTERPOL virtually, not to mention the day-to-day intelligence exchange with our overseas counterparts. To highlight, the JFIU entered into a memorandum of understanding for financial intelligence exchange with a European financial intelligence unit (FIU) through a virtual signing ceremony in December 2021.

In the wake of the COVID-19 pandemic, cybercrimes and financial crimes were on an upward spiral. Consumers increasingly turned to online platforms for economic and social activities amidst tightened social measures and criminals took advantages of the disarray to carry out scams, which led to significant monetary loss. Recognising the need to raise public awareness of the heightened ML risks, the FIIB initiated an unprecedented large-scale AML programme – 'Project AccFencers'. The project aimed at uniting the industry and the public to combat ML activities. Through a series of publicity



有的大型打擊洗錢計劃「守戶者聯盟」。該計劃旨在團結業界和市民共同打擊洗錢活動。財富情報及調查科於2021年11月至12月進行一系列宣傳活動和主動執法行動,憑藉各持份者和機構通力合作,協助宣揚打擊洗錢訊息以及打擊相關罪行,說動劃最終圓滿完成。聯合財富情報組作為主要聯繫單位,亦積極聯絡政策制訂者、監管機構、專業人士和業界從業員,爭取他們的支持和參與。

展望2022年,香港將就相互評估報告提出的改善建議,依時向特別組織報告,以配合定期跟進程序的評估。本港在2018年的第一個風險評估和2019年的最新一輪相互評估均表現理想,承接過往的驕人成績,我們樂見剛發布的第二輪風險評估報告。聯合財富調查組會繼續全力配合正在進行的風險評估和相互評估工作。

另一方面,金融環境瞬息萬變,為確保人員繼續有效打擊犯罪分子,聯合財富情報組於2021年7月著手建立「財務數據分析平台」。平台配備數據處理和分析能力,利用數據探勘、機器學習和人工智能等先進科技,協助財富情報及調查科進行分析及發布資訊。

我希望藉此機會衷心感謝所有持份者一直以來的積極支持,為香港奠下重要的基石抵禦洗錢、恐怖分子資金籌集和相關罪行的威脅。聯合財富情報組致力把香港流域無洗錢罪行的城市,一路上我們並不不過。我們會繼續加強與本地及海外持份者的合作。正如財富情報及調查科的格言「睿智同心,追跡尋真」,讓我們攜手迎接未來的挑戰,齊心打擊洗錢及恐怖分子資金籌集和相關罪案。

campaigns and proactive enforcement operations between November and December 2021, the project turned out to be a great success with the concerted efforts of different stakeholders and organisations in promoting AML messages and combatting related crimes. As a focal point of liaison, JFIU proactively engaged with local policymakers, regulatory authorities, professionals and industry participants to enlist their support to participate in the event.

Looking ahead to 2022, Hong Kong would be preparing for the regular follow-up assessment process in which we would be due for reporting to the FATF with regard to the recommendations raised in the Mutual Evaluation (ME) report. Riding on the success of the 1st HRA in 2018 and latest round of ME in 2019, we are glad to see the recent publication of the 2nd HRA report. The JFIU will continue to provide its full support to the ongoing HRA and ME work.

On the other hand, to stay ahead of criminals amidst the fast-evolving financial landscape, the JFIU commenced the development of the 'Financial Data Analytic Platform' (FDAP) in July 2021, which is a new system equipped with data processing and analytic capabilities such as data mining, machine learning and artificial intelligence to support the FIIB's analytical work and information dissemination.

Taking this opportunity, I wish to express my heartfelt gratitude for the constant and generous support from all the stakeholders, which form the cornerstone to Hong Kong's resilience to ML, TF and associated offences. The JFIU never walks alone on the path towards the ML-free Hong Kong, and we will continuously strengthen the widest possible range of collaboration with our domestic and international stakeholders. Like the FIIB's motto 'Uncommon minds with common goal, trace the untraceable', let us join hands and embrace the challenges ahead in combatting money laundering, financing of terrorism and associated crimes.

香港聯合財富情報組主管 **梁靄琳警司**  **Carmen LEUNG** 

Superintendent of Police HEAD of JFIU, Hong Kong





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,以及金融機構及指定非金融企業及行業。

#### 本組職責

本組就內在及外在風險持續進行評估,履 行廣泛職務,鋭意打擊和防範洗錢、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及發布相 關報告
- 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
- 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

#### **Our Role**

The JFIU is jointly run by staff members of the HKPF and the C&ED. It is a law-enforcement-type 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 LEAs worldwide.

Distinctive in its intelligence analysis capabilities and perspectives, the JFIU contributes to the AML/CFT regime through close interagency collaboration with policy bureaux and government departments, financial regulators and other professional bodies, LEAs and FIUs, financial institutions (FIs) and designated non-financial businesses and professions (DNFBPs).

#### **Our Charter**

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 and dissemination of STRs
- global exchange of financial intelligence and information
- strategic analysis of financial intelligence and other information
- operation of the Suspicious Transaction Report and Management System (STREAMS)
- support on provisional measures to prevent further dealing of suspicious property

#### 財富情報及調查科的成立

2021年6月1日,財富調查組、聯合財富情報組和財富調查總部正式脱離毒品調查科,並組成財富情報及調查科,以加強警隊打擊洗錢及恐怖分子資金籌集活動的能力。2021年6月17日,財富情報及調查科在警察總部舉行開幕典禮,由時任警務處處長鄧炳強主持儀式,財富情報及調查科正式開始運作。

#### **Establishment of the FIIB**

The Financial Investigation Division (FID), the JFIU and Financial Investigation Headquarters (FI HQ) were officially detached from the Narcotics Bureau on 1 June 2021, forming the FIIB with a view to enhancing the Force's AML/CFT capabilities. The commencement of FIIB's operation was marked by the opening ceremony of FIIB at the Police Headquarters on 17 June 2021, and officiated by the then Commissioner of Police Mr. TANG Ping-keung.





時任警務處處長鄧炳強於開幕典禮上致辭。 The then Commissioner of Police Mr. TANG Ping-keung gave a speech at the opening ceremony.

時任警務處處長鄧炳強(中)、時任 警務處副處長(行動)蕭澤頤與一眾 高級官員主持開幕儀式。

The then Commissioner of Police Mr. TANG Ping-keung (centre), the then Deputy Commissioner of Police, Operations Mr. SIU Chak-yee and other senior officers officiated at the opening ceremony.

財富情報及調查科由一名總警司及一名高級警司指揮,轄下有三個組別,分別由一名警司領導:財富調查組負責調查洗黑錢及恐怖分子資金籌集的案件,並作出檢控:聯合財富情報組負責處理及分析可疑交易報告、與其他財富情報單位和本地及海外執法部門交換情報,並與銀行等持份者保持緊密聯繫;而總部則負責相關政策和立法事宜、策略分析、持續進行全港性風險評估、培訓及外展工作。

The FIIB is commanded by a Chief Superintendent and assisted by a Senior Superintendent. Each of its three divisions is headed by a Superintendent, namely the FID which investigates and prosecutes ML/TF cases; the JFIU which processes and analyses STRs, exchanges financial intelligence with other FIUs as well as local and foreign LEAs, and maintains close liaison with banks and other stakeholders; and the Headquarters which looks after AML/CFT policy and legislation matters, strategic analysis, ongoing territory-wide ML/TF risk assessment, training and outreaching.

# 2021年聯合財富情報組的里程碑

Milestones of JFIU in 2021

六月 June



- 2021年6月1日成立財富情報及調查科 Establishment of FIIB on 1 June 2021
- 聯合財富情報組人員首次以財富情報及調查科代 表身分出席財務行動特別組織全體會議 Officers of JFIU first presence in FATF Plenary in name of FIIB representatives

七月 July

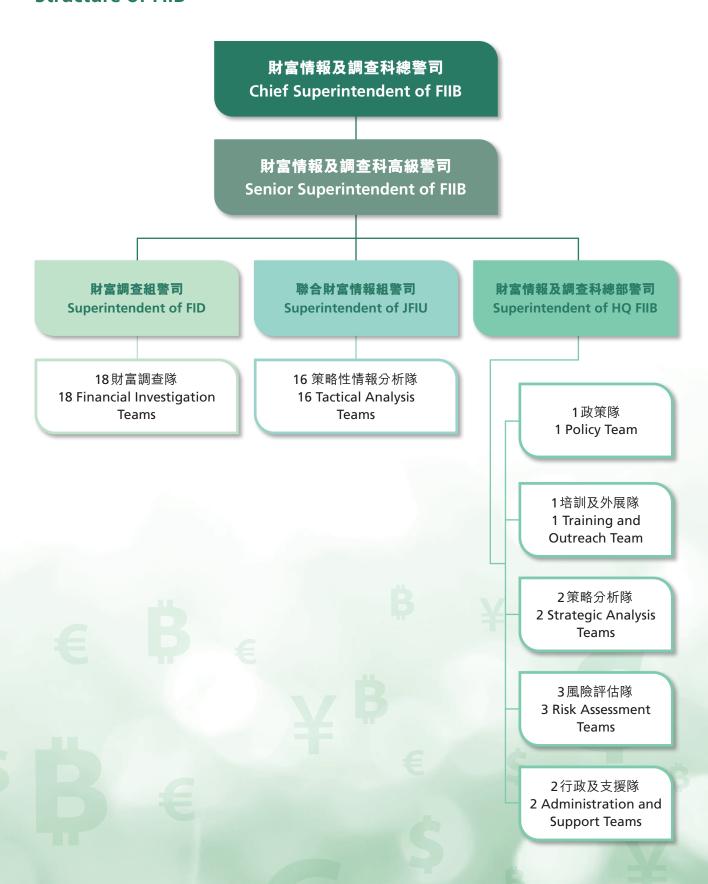


建立財務數據分析平台的撥款申請獲立法 會批准

Funding approval for the Financial Data Analytic Platform project was obtained from the Legislative Council of Hong Kong



#### 組織架構 Structure of FIIB



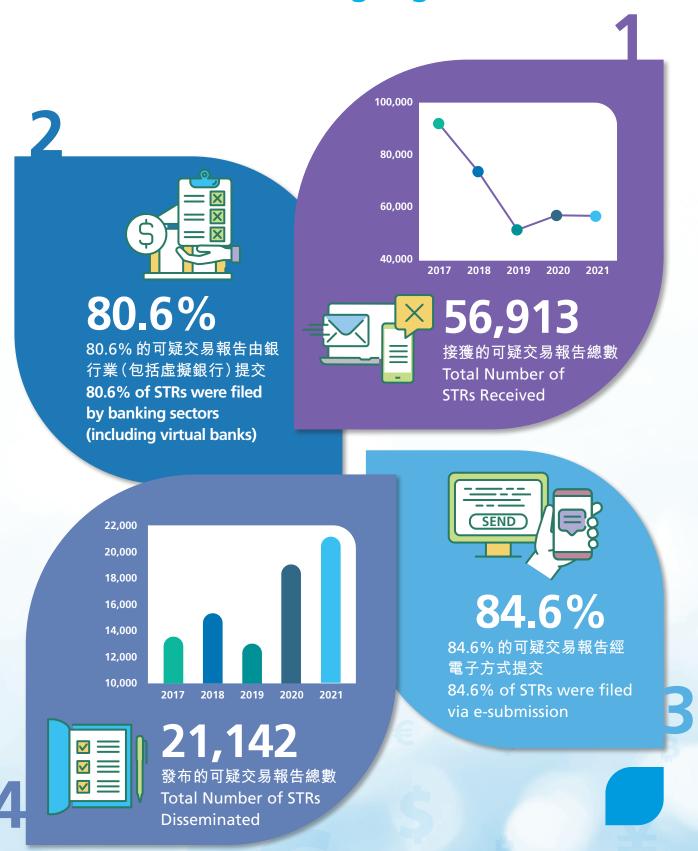
# 聯合財富情報組的

工作成果概覽

JFIU Highlights



## 2021年聯合財富情報組的主要工作成果概覽 JFIU Achievement Highlights in 2021





89.0%

37.1%的可疑交易報告被發布, 其中89.0%發布至香港警務處 37.1% of the STRs were disseminated. Of those, 89.0% were referred to the HKPF



自 2006 年起,共簽訂了 15 份 諒解備忘錄或協議 15 MOUs or Agreements were signed since the year of 2006



接獲的情報交換次數 Incoming Exchange

發出的情報交換次數 Outgoing Exchange



2,167

聯合財富情報組與世界各地財富情報單位交換財富情報共2,167次 2,167 exchanges of Financial Intelligence between the JFIU & FIUs Worldwide



X 17

舉辦 17 個打擊洗錢及恐怖分子資金籌 集講座,向不同業界傳達舉報可疑交 易的資訊

17 AML/CFT seminars to convey key messages of suspicious transaction reporting were delivered to different sectors

# 可疑交易報告 Suspicious Transaction Report



#### 舉報可疑交易的法律依據

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;或凡任何人知數不可以懷疑任何財產是恐怖分子財產,該人類在合理範圍內盡快將該知悉或懷疑的類類不會理範圍內盡快將該知悉或懷疑的類類,以提交可疑交易報告的方式披露)。

#### 接收可疑交易報告

聯合財富情報組於2021年共接獲56,913 宗可疑交易報告,與上年度比較,下跌 0.4%(即減少217宗報告)。金融機構提 交的報告數目繼續佔超過全年總數的 97%,其中銀行業為過去幾年主要的報告 來源。由於本港金融科技迅速崛起,傳統 銀行業提交的報告數目輕微下跌,而虛擬 銀行提交的報告數目則錄得十倍,數目 上升趨勢,而儲值支付工具持牌人於2021 年提交的報告數目亦較去年增加接近一 倍。隨着證券及期貨事務監察委員會(證 監會)引入發牌制度<sup>1</sup>,於2021年起新設 虛擬資產服務提供者界別。

# **Legal Basis for Suspicious Transaction Report**

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; or (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 for him/ her to do so disclose that knowledge or suspicion (i.e. by way of STR) to an authorised officer (i.e. JFIU officer).

On receipt of each STR, the JFIU will examine and conduct intelligence analysis in accordance with its risk-based assessment mechanism, examining aspects of the report, including its degree of suspicion, severity and level of risk. Apart from providing feedback to respective reporting entities, valuable intelligence from STRs is developed and/or disseminated to investigative units of LEAs or other agencies, enabling them to intervene and disrupt ML/TF activities and assisting in investigations. The JFIU also endeavours to keep relevant AML/CFT stakeholders abreast of the recent suspicious indicators and emerging case typologies.

#### **Receipt of STRs**

The JFIU received a total of 56,913 STRs in the year of 2021 and a 0.4% decrease in number (217 STRs) is noted as compared with the previous year. Financial institutions continue to account for over 97% of the annual total STR submissions, with the banking sector as the dominant contributor over the past few years. STR submissions slightly decreased in the traditional banking sector, while the submissions in virtual banks had observed a tenfold increase, with the rapid development of financial technology (FinTech) in Hong Kong. Besides, there was a general rising trend in submissions filed by money service operators, whilst the number of submissions filed by stored value facilities (SVFs) licensees almost doubled in 2021. With the introduction of the licensing regime¹ by Securities and Futures Commission (SFC), a new category for virtual asset service provider (VASP) was added in 2021.

<sup>1 2019</sup>年11月,證監會發表立場書,就提供證券型虛擬資產或代幣交易服務的平台制定發牌制度。該制度適用於起碼提供一種證券型虛擬資產交易服務的平台。在該制度下,所有有意申領牌照的平台營運者可向證監會提交申請。持牌平台營運者須受到證監會監管,並遵守證監會的發牌條件。 In November 2019, the SFC issued a position paper setting out a licensing framework for platforms which offer trading of securities-type VAs or tokens. The

In November 2019, the SFC issued a position paper setting out a licensing framework for platforms which offer trading of securities-type VAs or tokens. The regime applies to those platforms which offer trading services involving at least one VA with securities features. Under the regime, any platform operator who is interested in applying for a licence may submit an application to the SFC. A licensed platform operator will be subject to the supervision of the SFC and required to observe the licensing conditions.



### 分析可疑交易報告 Analysis of STR

行業 Sector		2017	2018	2019	2020	2021
金融機構 Financial Institu	ıtions (FIs)					
銀行	傳統銀行	86,029	68,146	44,689	47,888	39,818
Banks	Traditional Banks	(93.39%)	(92.23%)	(86.63%)	(83.82%)	(69.96%)
	虛擬銀行 Virtual Banks	/	/	/	637 (1.12%)	6,075 (10.67%)
保險公司		1,094	1,236	1,335	1,179	1,207
Insurance Companies		(1.19%)	(1.67%)	(2.59%)	(2.06%)	(2.12%)
放債人		28	39	34	17	54
Money Lenders		(0.03%)	(0.05%)	(0.07%)	(0.03%)	(0.09%)
證券公司		2,090	1,337	735	694	678
Securities Firms		(2.27%)	(1.81%)	(1.42%)	(1.21%)	(1.19%)
儲值支付工具		590	529	1,321	2,512	5,032
Stored Value Facilities		(0.64%)	(0.72%)	(2.56%)	(4.40%)	(8.84%)
金錢服務經營者	rs	908	1,219	1,474	2,033	2,351
Money Service Operator		(0.99%)	(1.65%)	(2.86%)	(3.56%)	(4.13%)
虚擬資產服務提供者 (*2021年1月起新設的界別) Virtual Asset Service Pro (*New Category since Jan 2021)	viders	/	/	/	/	16 (0.03%)
金融機構提交的報告總數 Total Number of STRs Fi (% of all STRs Received)	led by FIs	90,739 (98.51%)	72,506 (98.13%)	49,588 (96.12%)	54,960 (96.20%)	55,231 (97.04%)
指定非金融企業及行業 De	signated Non-Finar	ncial Busines	sses and Pro	ofessions (D	NFBPs)	
地產代理		71	47	74	93	92
Estate Agencies		(0.08%)	(0.06%)	(0.14%)	(0.16%)	(0.16%)
貴重金屬及寶石交易商	als & Stones	60	70	20	25	10
Dealers in Precious Meta		(0.07%)	(0.09%)	(0.04%)	(0.04%)	(0.02%)
法律專業人士		555	416	810	807	597
Legal Professionals		(0.60%)	(0.56%)	(1.57%)	(1.41%)	(1.05%)
會計專業人士	s	19	22	18	16	9
Accounting Professional		(0.02%)	(0.03%)	(0.03%)	(0.03%)	(0.02%)
信託及公司服務提供者 Trust and Company Serv	rice Providers	31 (0.03%)	81 (0.11%)	91 (0.18%)	104 (0.18%)	162 (0.28%)
指定非金融企業及行業提 (佔報告總數比率) Total Number of STRs Fi (% of all STRs Received)		736 (0.80%)	636 (0.86%)	1,013 (1.96%)	1,045 (1.83%)	870 (1.53%)
其他行業提交的報告宗數 (佔報告總數比率) Number of STRs Filed by (% of all STRs Received)		640 (0.69%)	747 (1.01%)	987 (1.91%)	1,125 (1.97%)	812 (1.43%)
接獲報告總數 Total Number of STRs Re	eceived	92,115	73,889	51,588	57,130	56,913

各行業提交的可疑交易報告是本組進行行動和策略分析的主要資料來源。本組採取以風險為本的方法評估每宗接獲的報告,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。

#### 發布可疑交易報告

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。2021年,本接獲56,913宗可疑交易報告,其中獲發布的可疑交易報告有21,142宗,發布比率達37.1%,為歷年新高,而香港警務處(89.0%)及香港海關(4.9%)為獲發布可疑交易報告的主要對象。

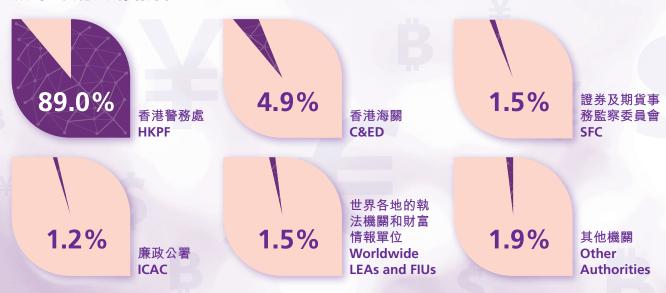
The STRs received from various sectors are the major source of information for conducting operational and strategic analyses by the JFIU. Risk-based approach is adopted during the assessment of each and every STR received, with regular reference to the latest ML/TF landscape and typologies. After reviewing 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.

#### **Dissemination of STRs**

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 analyses. 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 56,913 STRs received in the year of 2021, 21,142 were disseminated which marked the highest dissemination rate of 37.1% throughout the years. HKPF (89.0%) and C&ED (4.9%) were the major recipients.

	2017	2018	2019	2020	2021
發布的可疑交易報告總數 Total Number of STRs Disseminated	13,566	15,349	13,039	19,077	21,142
可疑交易報告發布比率 STRs Dissemination Rate	14.7%	20.8%	25.3%	33.4%	37.1%

#### 發布可疑交易報告 STR Dissemination





#### 取閱可疑交易報告資料

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資料備存在於(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管工式申請,要求索取在可疑交易報告管理系統的備存資料(有關資料可涵蓋資金別數分分別。本港授權用戶(包括香港警務處及香港海關人員)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,適時進行日常調查/情報拓展工作。

2017至2021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大部份維持在4,000次至5,000次左右,而直接在可疑交易報告管理系統進行搜尋的次數,則由135,863次上升至234,627次,錄得72.7%的升幅。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。

#### **Access to STR Information**

The JFIU has a wealth of STR information available on the webbased 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 authorised users (including the HKPF and C&ED officers) to conduct direct searches on STREAMS to facilitate the appropriate use of financial information for daily investigations/intelligence cultivation on a timely manner.

Between 2017 and 2021, the annual number of request for STREAMS record checks made to the JFIU mainly remained around 4,000-5,000; whilst direct searches made on STREAMS mounted by 72.7% from around 135,863 to 234,627. 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.

	2017	2018	2019	2020	2021
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	3,301	4,796	5,062	4,876	4,103
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	135,863	171,302	151,561	214,730	234,627

為加強善用科技,本組於2021年7月獲立 法會撥款落實發展財務數據分析平台。財 務數據分析平台將配備數據處理和分析功 能,利用數據探勘、機器學習和人工智能 等先進技術,協助財富情報及調查科進行 分析及發布資訊。

另一方面,本組亦正與本地大專院校合作,研究利用自然語言處理技術加強檢查 和評估可疑交易報告的能力。 To better make use of technology, the JFIU secured funding from the Legislative Council in July 2021and has been proceeding with the development the Financial Data Analytic Platform (FDAP), which will be equipped with data processing and analytic capabilities to employ advanced technologies such as data mining, machine learning and artificial intelligence to support the FIIB's analytical work and information dissemination.

On the other hand, the JFIU is also collaborating with a local tertiary institution on exploring the enhancement of STRs screening and assessment with the use of natural language processing.

	2017	2018	2019	2020	2021
以電子方式處理的可疑交易報告比率 (涉及的可疑交易報告總數) % of Electronic Processing of STRs (Total Number of STRs Involved)	92.91% (85,582)	91.44% (67,565)	87.62% (45,203)	88.40% (50,501)	84.55% (48,122)
以人手方式處理的可疑交易報告比率 % of Manual Processing of STRs	7.09%	8.56%	12.38%	11.60%	15.45%

#### 可疑交易報告質素意見回饋

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》(可於可疑交易報告管理系統限制區 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。

隨着香港金融科技的發展,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。雖然遙距開戶、電子銀行服務、「轉數快」交場值支付工具的智能支付非常方便也同時為罪犯提供新的犯罪機會個傀儡有一次清洗非法得益。舉報,與國險為本的方法,運用科技減取以風險為本的方法,運用科技減取以風險為本的方法,運用科技減取以風險為本的方法,運用科技減取的「認識你的客戶」程序識別可戶應人方。與此一次,並應在監督交易時保持警別可疑不知,並應在監督交易時保持警別可疑不知,並應在監督交易時保持警別可疑不知,

#### **Feedback on STR Quality**

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 STREAMS) to enhance mutual communication and raise AML/CFT awareness of the private sector. Fls 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 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 remote onboarding, e-banking services, faster payment system transactions and smart payment through SVFs have brought convenience to customers, which at the same time provide new opportunities for criminals to manipulate multiple stooge accounts for laundering illicit proceeds without physical presence. Reporting entities are encouraged to adopt a risk-based approach, employ technological 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

#### 與舉報可疑交易的機構定期 聯蟿

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資助恐怖主義活動。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。

#### **Local Cooperation with Stakeholders**

The JFIU treasures and seeks to enhance interagency collaboration within the AML/CFT community. At the strategic level, government bureaux, 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.

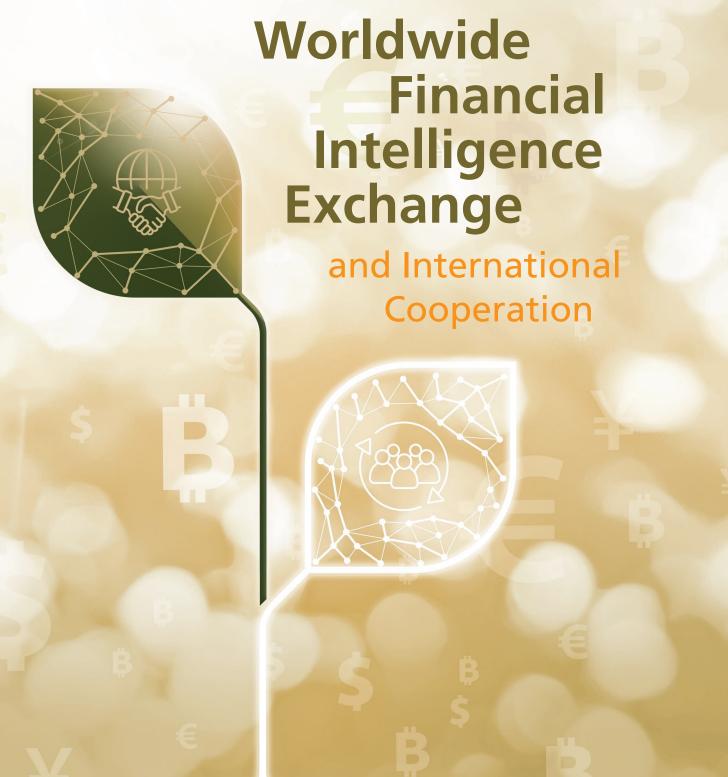
## Regular Liaison with STR Reporting Entities

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 finance terrorism. To strengthen 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.

The JFIU is committed to building and maintaining an effective public-private partnership. Amidst the pandemic, the JFIU regularly holds video conferences with relevant government bureaux/departments, regulatory authorities, FIs and SVFs to discuss and advise on matters of common interest in suspicious transaction reporting, share views on policies and operational priorities. From time to time alerts are published on the noticeboard at the secure area of STREAMS to keep FIs and DNFBPs up-to-date on the latest crime trends and ML/TF landscape.

# 國際財富情報交流

及國際合作





#### 國際合作及參與

洗錢及恐怖分子資金籌集罪行多涉及跨境 或跨國性質,因此國際合作對打擊相關罪 行極為重要。儘管2021年新型冠狀病毒 病肆虐,本組仍致力與各個國際財富情報 單位保持緊密合作。本組代表亦繼續出席 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 的睿見以作深入了解。

財富情報及調查科人員積極參與財務行動 特別組織(特別組織)、亞洲/太平洋反清 洗黑錢組織(亞太反洗錢組織)及埃格蒙特 組織舉辦的會議和工作坊,以交換財富情 報和分享經驗。

# International Cooperation and Representation

International cooperation is indispensable to the success of combating ML/TF activities, which are often of cross-border or transnational nature. Despite the COVID-19 pandemic in 2021, the JFIU strived to maintain effort in cooperation and collaboration with international FIUs. Representatives from the JFIU continued to extend its network and share insights with other jurisdictions into global ML/TF trend and mutual evaluation preparation work through attending various conferences and meetings virtually.

FIIB officers participated in the meetings and workshops of the Financial Action Task Force (FATF), the Asia/Pacific Group on Money Laundering (APG) and the Egmont Group of FIUs (Egmont Group), with a view to exchanging financial intelligence and sharing experience.

## 財務行動特別組織(特別組織) The Financial Action Task Force (FATF)

The FATF is an intergovernmental body comprising 39 members and was mandated since 1989 to establish standards and promote AML/CFT measures at both national and international levels. Hong Kong has been a member of the FATF since 1991 and FIIB has always been working closely with other government agencies, including the FSTB, to contribute to effective policy outcomes within the FATF arena.

特別組織於1989年成立,由39個成員組成,屬跨政府組織,旨在確立標準以及在國家和國際層面推廣打擊洗錢及恐怖分子資金籌集的措施。香港自1991年起已是特別組織的成員。財富情報及調查科一直與其他政府機構(包括財經事務及庫務局)緊密合作,致力取得具成效的政策成果。



財富情報及調查科人員於2021年6月參加財務行動特別組織網上會議。 Attendance of a virtual meeting of the FATF in June 2021.



財富情報及調查科人員於2021年12月出席由位於韓國的特別組織訓練學院舉辦的第一屆特別組織導師標準訓練課程。(相片提供:特別組織訓練學院)Officers of FIIB attended the first FATF Standards Training Course for trainers organised by the FATF Training Institute in Korea in December 2021. (Photo Credit: FATF Training Institute)

## 亞洲/太平洋反清洗黑錢組織(亞太反洗錢組織) The Asia/Pacific Group on Money Laundering (APG)

The APG was officially established in 1997 as a regional AML body and is often referred as a FATF-Style Regional Body (FSRB). To date, the APG consists of 41 members in the Asia/Pacific region. Hong Kong is one of the 13 founding members of the APG and has been an active member since then.

亞太反洗錢組織於1997年正式成立,屬地區反洗錢組織,常被視為與特別組織形式相若的地區組織。組織目前在亞洲/太平洋地區有41名成員。香港為13個創始成員之一,並一直積極參與組織活動。

#### 埃格蒙特組織(由世界各地的財富情報單位組成) The Egmont Group of FIUs (Egmont Group)

埃格蒙特組織於1995年4月成立, 是一個有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。自 1996年起,香港加入埃格蒙特組 織,並展現其阻截和打擊跨國洗 錢及恐怖分子資金籌集的決心。

作為埃格蒙特組織的一員,本組 與全球各地的財富情報單位緊密 合作,協助跨司法管轄區執法和 交換情報,並在有需要時向海外 執法機關提供支援。



聯合財富情報組人員於2021年2月出席埃格蒙特組織網上會議。 JFIU officers attended the Egmont Group virtual meeting in February 2021.

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/TF.

As a member of the Egmont Group, the JFIU works with FIUs worldwide to support cross-jurisdiction law enforcement and intelligence exchange. The JFIU also provides assistance to overseas law enforcement agencies whenever appropriate.



#### 國際財富情報交流

財富情報單位在支持本地及國際打擊洗錢及恐怖分子資金籌集方面獨具優勢。本組向來珍視與全球各地財富情報單位交換的情報。

2021年,本組與各地的交換情報書信往來 共錄得2,167次,較2020年的總數(2,364次) 下跌8.3%。

# **Worldwide Financial Intelligence Exchange**

FIUs are uniquely positioned to support domestic and international efforts in AML/CFT. The JFIU treasures and values the information exchanged with FIUs worldwide.

In 2021, the JFIU recorded 2,167 correspondences, a decrease of 8.3% in total number of correspondences exchanged as compared with 2020 (2,364 correspondences).

#### 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	2017	2018	2019	2020	2021		
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)	991	1,197	1,283	924	1,007		
(非埃格蒙特組織) (Non-Egmont Group)	154	123	209	177	134		
接獲總數Incoming Total	1,145	1,320	1,492	1,101	1,141		
對外發出的交換情報書信往來次數 Total No. of	f Outgoing	Correspond	ences				
(埃格蒙特組織) (Egmont Group)	990	1,036	1,135	933	707		
(非埃格蒙特組織) (Non-Egmont Group)	358	290	243	330	319		
發出總數 Outgoing Total	1,348	1,326	1,378	1,263	1,026		
總數 Total	2,493	2,646	2,870	2,364	2,167		

<sup>(\*</sup>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)

<sup>(\*</sup>Non-Egmont Group members include mainly non-Egmont FIUs and occasionally other overseas LEAs)

2021年,本組與全球111個埃格蒙特組織成員及5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 2021, the JFIU exchanged financial intelligence with 111 Egmont Group members and five non-Egmont Group members across continents. The number of FIUs from each continent being engaged is shown as follows:

#### 2021年與本組交換財富情報的埃格蒙特組織單位數目(按地區劃分\*) Number of Egmont FlUs Exchanged Financial Intelligence with the JFIU in 2021 (By Regions\*)

地區 Regions	財富情報單位數目 No. of FIUs
美洲 Americas	21
歐洲(一)Europe I	27
歐洲(二) Europe II	20
歐亞 Eurasia	5
亞洲及太平洋 Asia & Pacific	22
東非及南非East & Southern Africa	4
西非及中非West & Central Africa	5
中東及北非Middle East & North Africa	7
總數 Total	111

<sup>(\*</sup>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)

如下頁圖表所示,本組與美洲地區的成員 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1,007 次,而美洲地區的相關書信往來總數達 295次,高踞各區首位。綜觀2021年所接 獲的交換情報書信往來次數,中東及北非 地區的相關書信往來數目,與2020年相 比,錄得顯著升幅。

As shown from the table on the next page, the JFIU has frequent exchange of intelligence with members from Americas in 2021, of which 295 out of 1,007 incoming correspondences were received from the Region. The year of 2021 recorded a significant increase in incoming correspondences with Middle East & North Africa, as compared to 2020.



#### 2020年及2021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 2020 and 2021

地區 Regions	交換情報書信往來的次數 No. of Correspondence		
	2020	2021	
美洲 Americas	152	295	
歐洲(一)Europe I	330	288	
歐洲(二)Europe II	104	94	
歐亞 Eurasia	38	37	
亞洲及太平洋 Asia & Pacific	264	221	
東非及南非East & Southern Africa	13	8	
西非及中非West & Central Africa	7	10	
中東及北非Middle East & North Africa	16	54	
總數 Total	924	1,007	

#### 2021年與財富情報單位交 換情報的趨勢

全球各地的財富情報單位一般採取較為審慎的原則,發出較清晰的交換情報要求或自發分享情報。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,訛騙及洗錢仍然為最常見的所涉罪案,而接收和發布的資料和情報均愈趨複雜。

# Trend of Information Exchange with FIUs in 2021

FIUs worldwide in general took a more prudent approach and submitted more structured requests or spontaneous sharing. Whilst fraud and money laundering continued to be the most prevalent crime types of both incoming and outgoing requests, as well as in incoming and outgoing spontaneous sharing of information, complexity of information and intelligence received and shared continued to increase.

	第一位 1 <sup>st</sup>	第二位 2 <sup>nd</sup>	第三位 3 <sup>rd</sup>	第四位 4 <sup>th</sup>	第五位 5 <sup>th</sup>
接獲要求索取情報的性質 Nature of Incoming Requests	洗錢 Money Laundering (240)	可疑交易 Suspicious Transactions (111)	訛騙 Fraud (58)	詐騙 Deception (24)	税務罪行 Tax Crime (16)
接獲自發分享情報的性質 Nature of Incoming Spontaneous Sharings	訛騙 Fraud (245)	可疑交易 Suspicious Transactions (116)	洗錢 Money Laundering (54)	詐騙 Deception (17)	税務罪行 Tax Crime (6)

	第一位 1 <sup>st</sup>	第二位 2 <sup>nd</sup>	第 <b>三位</b> 3 <sup>rd</sup>	第四位 4 <sup>th</sup>	第五位 5 <sup>th</sup>
發出要求索取情報的性質 Nature of Outgoing Requests	詐騙 Deception (21)	洗錢 Money Laundering (19)	訛騙 Fraud (7)	盗竊 Theft (1)	不適用 N/A
自發分享情報的性質 Nature of Outgoing Spontaneous Sharings	洗錢 Money Laundering (23)	訛騙 Fraud (17)	內幕交易 / 操縱市場 Insider Trading / Market Manipulation (8)	Corruption	兑務罪行 / Tax Crime (6)

<sup>\*()</sup>要求索取/分享情報的數目

#### 與其他司法管轄區簽訂諒解 備忘錄或協議

香港法律並無規定必須具備交換工具或簽訂諒解備忘錄,以交換情報調查洗錢及恐怖分子資金籌集和相關犯罪活動。然而,如某些司法管轄區的法律規定必須簽訂交換情報的雙邊協定,本組會與有關單位簽訂諒解備忘錄,為加強雙方合作和諒解提供框架。

2021年,本組與土耳其金融犯罪調查委員會(MASAK)就交換與洗錢及恐怖分子資金籌集相關的金融情報簽訂諒解備忘錄。本組已與14個司法管轄區簽署共15項諒解備忘錄或協議。

# Memorandum of Understanding (MoU) or Agreements with Other Jurisdictions

Hong Kong's legislation does not require any exchange instruments or MoU to be in place for the exchange of information in supporting of investigations related to ML/TF and related criminal activities. However, in order to provide a structural framework for enhanced cooperation and understanding, the JFIU would enter into MoU with jurisdictions where bilateral agreements are required under their domestic legislation for information exchange.

In 2021, the JFIU signed a MoU for the exchange of financial intelligence related to ML/TF with the Financial Crimes Investigation Board (MASAK) of the Republic of Turkey. This brings to a total number of 15 MoUs or Agreements that the JFIU has signed on cooperation with 14 jurisdictions.



財富情報及調查科總警司林敏嫻(左)於2021年12月出席網上簽署儀式,與土耳其金融犯罪調查委員會(MASAK)主席 Hayrettin KURT博士(右)簽署諒解備忘錄。

Ms. LAM Man-han Amy, Chief Superintendent of FIIB (left) and the Head of MASAK, Dr. Hayrettin KURT (right) signed the MoU in the virtual signing ceremony in December 2021.

<sup>\*( )</sup> denotes number of requests/ sharing

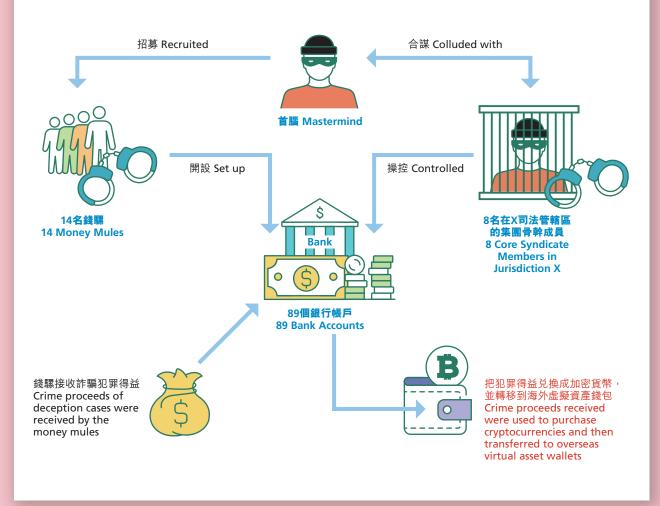


#### 案例 Case 1

#### 以虛擬資產形式存放犯罪得益 Placement of Proceeds of Crime in forms of Virtual Assets

2021年9月,香港警方與X司法管轄區成功瓦解一個跨境詐騙集團。4名錢關在案擊搜查期間,集團主腦及14名錢關在X司法管轄區被捕,另有8名集團骨幹成關在X司法管轄區被捕。經調查後關查集團在香港開設至少89個錢關查樣與不該集團在香港開設至少89個錢關查數,集團透過交易平台將部國查後報,並隨即銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行帳戶中的190萬港元已被別銀行。

In September 2021, the Hong Kong Police and Jurisdiction X jointly neutralised a cross-jurisdictional deception syndicate. During a synchronised raid, the mastermind of the syndicate and 14 money mules were arrested in Hong Kong, while eight core syndicate members were arrested in Jurisdiction X. Enquiry unveiled that the syndicate arranged to set up at least 89 money mule bank accounts in Hong Kong for receiving and laundering HKD 739M crime proceeds of scam cases. In-depth financial investigation revealed that part of the crime proceeds received were used to purchase cryptocurrencies via exchange platforms and were subsequently dissipated to other virtual asset wallets registered overseas. HKD 1.9M in the identified bank accounts were prevented from dissipation and investigation is ongoing.

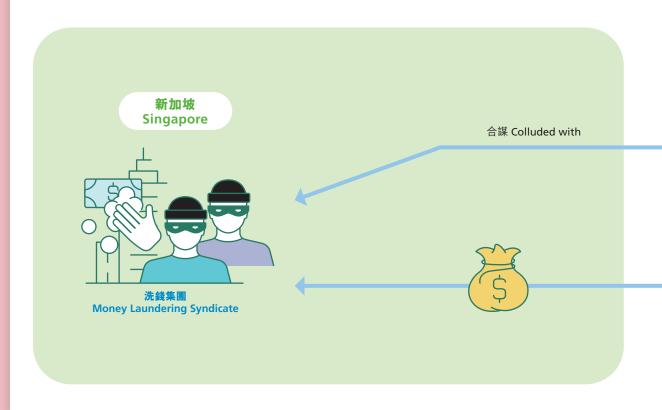


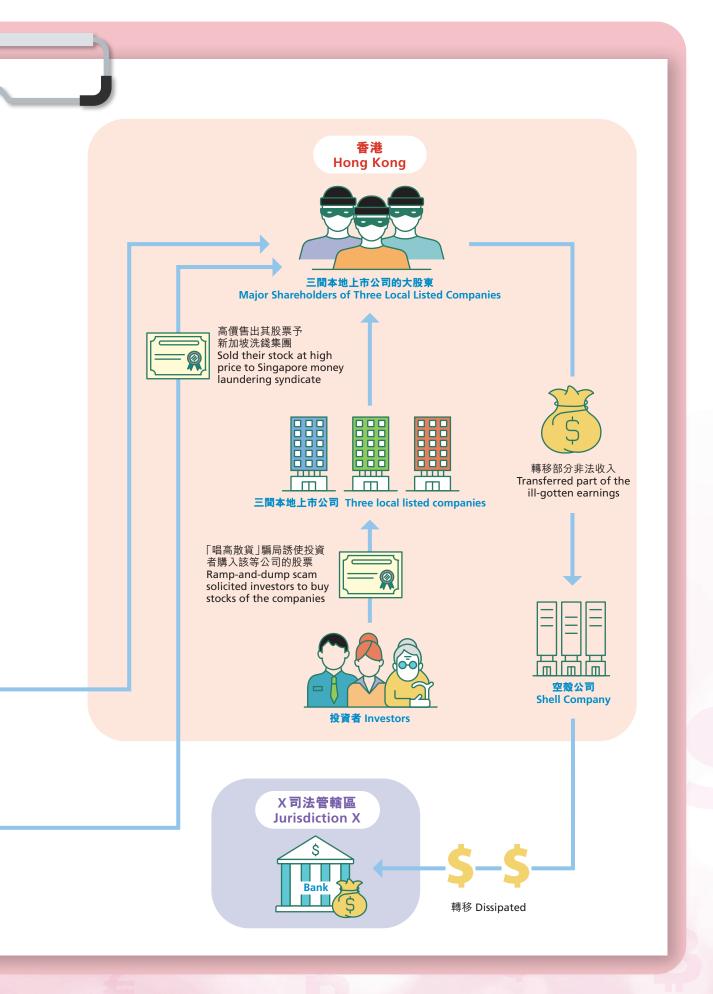


#### 案例 Case 2

#### 與新加坡當局展開聯合行動並瓦解一個洗錢集團 Joint Operation with the Singaporean Authorities in Neutralising a Money Laundering Syndicate

The SFC initiated a market manipulation investigation in which a money laundering syndicate was identified to have colluded with major shareholders of three local listed companies to orchestrate a ramp-and-dump scam which generated HKD 176M from the stock markets in Hong Kong for the syndicate. Case was referred to HKPF, Singapore Police Force and Monetary Authority of Singapore for parallel financial investigation, and it was revealed that part of the ill-gotten earnings were dissipated to Jurisdiction X via a bank account of a local shell company. An unprecedented crossborder operation amongst the four agencies was mounted in late 2021, resulting in the arrest of ten syndicate members including the major shareholders of the local listed companies in Hong Kong and Singapore. A total of HKD 48.5M in the bank accounts of syndicate members was prevented from dissipation. Investigation is ongoing.





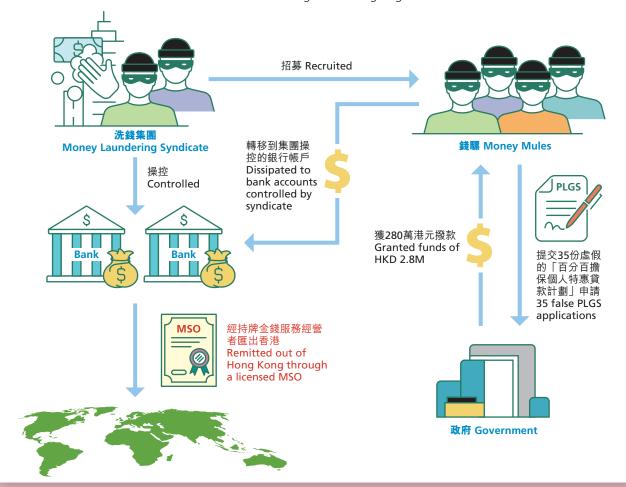


#### 案例 Case 3

#### 與政府貸款有關的詐騙及洗錢案件 Case of Fraud and Money Laundering Related to Government Loan Scheme

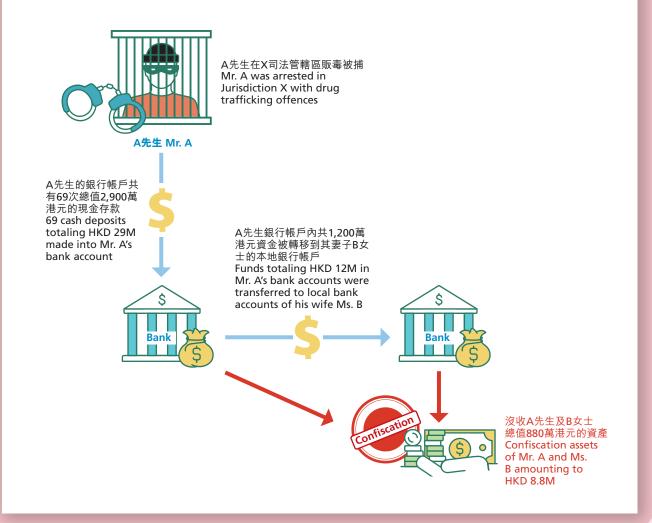
為減輕失業人士在2019冠狀病毒病疫情期間的經濟負擔,香港政府推出「百分百擔保個人特惠貸款計劃」(計劃),為市民提供最多8萬港元的免息貸款。經分析財富情報後發現,一個犯罪團聘用錢騾以虛假的僱傭紀錄及戶劃申請計劃,涉及35宗虛假的計劃申請計劃,涉及35宗虛假的計劃申請計劃,涉及35宗虛假的計劃申請計劃,涉案金額總值280萬港元。關貸款存入錢騾的銀行帳戶後,萬經時移到集團的其他銀行帳戶,再經持牌金錢服務經營者匯出香港。2021年10月,7名集團成員因「欺詐罪」及「洗錢罪」被捕。相關調查仍在進行。

To alleviate the financial burden of unemployed individuals during the COVID-19 pandemic, the Hong Kong Government has launched a "100% Personal Loan Guarantee Scheme (PLGS)" for citizens to borrow a maximum of HKD 80,000 interest free loan. Upon analysis of financial intelligence, it was unveiled that a syndicate recruited money mules to apply for PLGS with false employment and account proofs. A total of HKD 2.8M, in relation to 35 false PLGS applications, were deposited into the money mules' bank accounts and immediately dissipated to the other bank accounts controlled by the syndicate before they were remitted out of Hong Kong through a licensed MSO. In October 2021, seven syndicate members were arrested for "Fraud" and "Money Laundering". Investigation is ongoing.



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

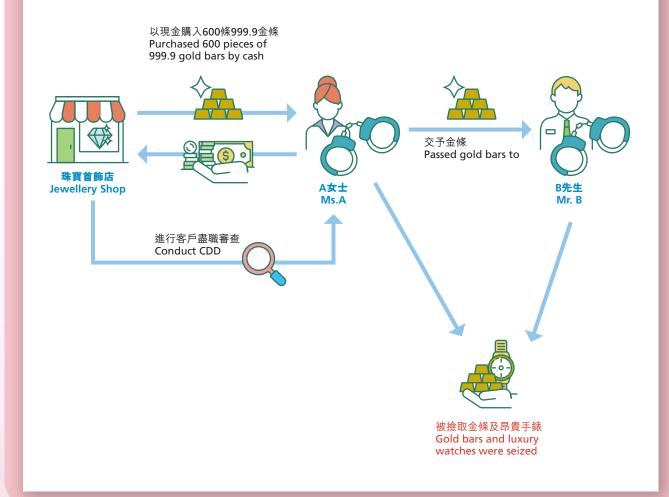
A先生在X司法管轄區因販毒被捕及被 判處終身監禁。財富情報揭示A先生 的銀行帳戶曾錄得69次現金存款,總 值2,900萬港元。A先生被捕後不久, 其居於Y司法管轄區的妻子B女士透 電話理財方式,把A先生存放在本地 銀行帳戶內共1,200萬港元資金轉帳至 自己的本地銀行帳戶。後來警方發現B 女士已經離世,遂根據「潛逃者/死者 法律程序」處理其資產。2021年11月, 高等法院發出沒收令,充公A先生及B 女士總值880萬港元的被限制資產。 Mr. A was arrested in Jurisdiction X with drug trafficking offences and convicted with penalty of life-imprisonment. Financial intelligence unveiled that there were 69 cash deposits totaling HKD 29M made into Mr. A's bank account. Shortly after the apprehension of Mr. A, funds totaling HKD 12M in his local bank accounts were transferred to local bank accounts of his wife Ms. B, who resided in Jurisdiction Y and made such transactions by phone-banking. It later came to light that Ms. B passed away and her monies were dealt with by way of "Absconder / Deceased Person Proceedings". In November 2021, Confiscation Order to forfeit the restrained assets of Mr. A and Ms. B amounting to HKD 8.8M was granted at the High Court.





#### 透過貴重金屬交易清洗黑錢 Money Laundering through the Purchase of Precious Metal

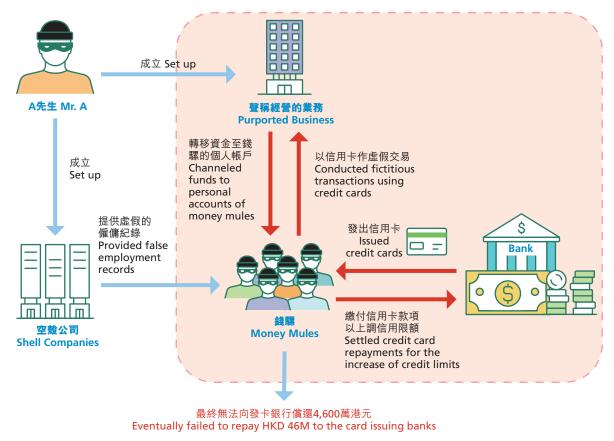
2020 年8 月,A女士在香港一間連鎖 珠寶零售店以5,900 萬港元現金購買 600 件純度達999.9、重112.5 公斤的 黃金條,並在零售商詢問其購買買 後發現,該筆交易與A女士的背景 顯不相符,於是在她從零售商處黃 顯不相符,於是在她從零售商處 黃金條時把她拘捕。她承認會將預 號令予B先生。B先生及後同被拘捕。 維在其住所檢獲現金及名貴手錶以 查顯示,A女士以現金購買黃金條 洗犯罪得益,相關調查仍在進行。 In August 2020, Ms. A purchased 600 pieces of 999.9 gold bars weighed 112.5 kg with HKD 59M cash at a chain jewellery retail shop in Hong Kong. The retailer enquired about the background of purchase and the source of fund, but Ms. A gave a doubtful account for the purchase. Police investigation revealed that the purchase was apparently incommensurate with Ms. A's background, and therefore arrested Ms. A upon her collection of gold bars at the retailer. Ms. A admitted that she was going to hand over the gold bars to Mr. B, who was later arrested with cash and some luxury watches seized from his residence. Investigation suggested that Ms. A purchased gold bars with cash to launder crime proceeds. Investigation is ongoing.



#### 利用虛假紀錄申請信用卡作多層交易掩飾犯罪得益 Layering of Proceeds of Crime with the Use of False Documents applying Credit Cards

A先生領導的信用卡詐騙集團成立多 間空殼公司,為錢騾提供虛假的僱傭 紀錄以申請信用卡,並利用該等信用 卡與A先生聲稱持有的公司作虛假交 易。接收到的資金會轉移至A先生的 個人帳戶,再匯到錢騾的銀行帳戶以 繳付信用卡款項,以便上調信用限額 及申請更多信用卡。結果6間本地銀 行發出超過250張信用卡,而該等信 用卡被利用與A先生聲稱的業務進行 8,580 萬港元的交易。錢騾最終無法向 發卡銀行償還4,600萬港元。2021年 4月,A先生和22名信用卡持有人被 捕,被捕人士的銀行帳戶內逾120萬 港元亦被防止轉移。相關調查仍在進 行。

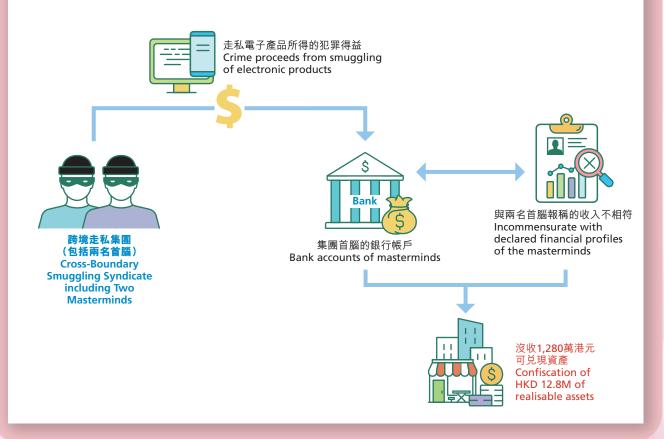
A credit card fraud syndicate headed by Mr. A set up a number of shell companies and provided false employment records for his money mules for credit card applications. Fictitious transactions were made with the credit cards at a purported business owned by Mr. A. Funds received were dissipated to the personal account of Mr. A and further channeled to the bank accounts of money mules for settling credit card repayments so that more credit cards could be successfully applied on top of the increase in credit limits. As a result over 250 credit cards were issued by six local banks with transactions amounting to HKD 85.8M made at Mr. A's purported business. The money mules eventually failed to repay a total of HKD 46M to the card issuing banks. Mr. A and 22 credit card holders were arrested in April 2021 with over HKD 1.2M in their personal accounts prevented from dissipation. Investigation is ongoing.





#### 沒收與跨境走私有關的犯罪得益 Confiscation of Crime Proceeds in relation to Cross-Boundary Smuggling

The C&ED conducted an investigation against a local syndicate engaged in cross-boundary smuggling of high-valued electronic products from Hong Kong to the Mainland via crossboundary passenger coaches, resulting in the arrest of nine syndicate members including two masterminds for smuggling. Financial intelligence from JFIU revealed that the bank accounts held by the masterminds received significant sums of deposits without the support of any legitimate business. Their bank balances and transaction volumes were highly incommensurate with their personal profiles and financial background. Suspecting that the deposits were crime proceeds derived from smuggling, the C&ED obtained a Restraint Order against the subject bank accounts. The two masterminds were convicted of the smuggling charges and were sentenced to imprisonment for 33 months and 36 months respectively. In November 2021, the Court ordered the confiscation of the HKD 12.8M of realisable assets held by the masterminds.

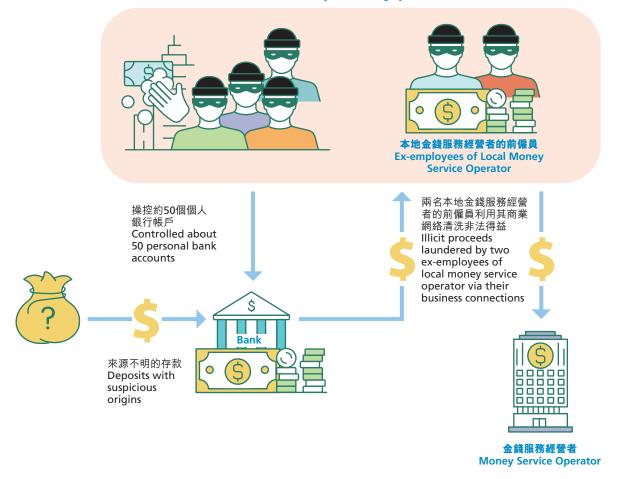


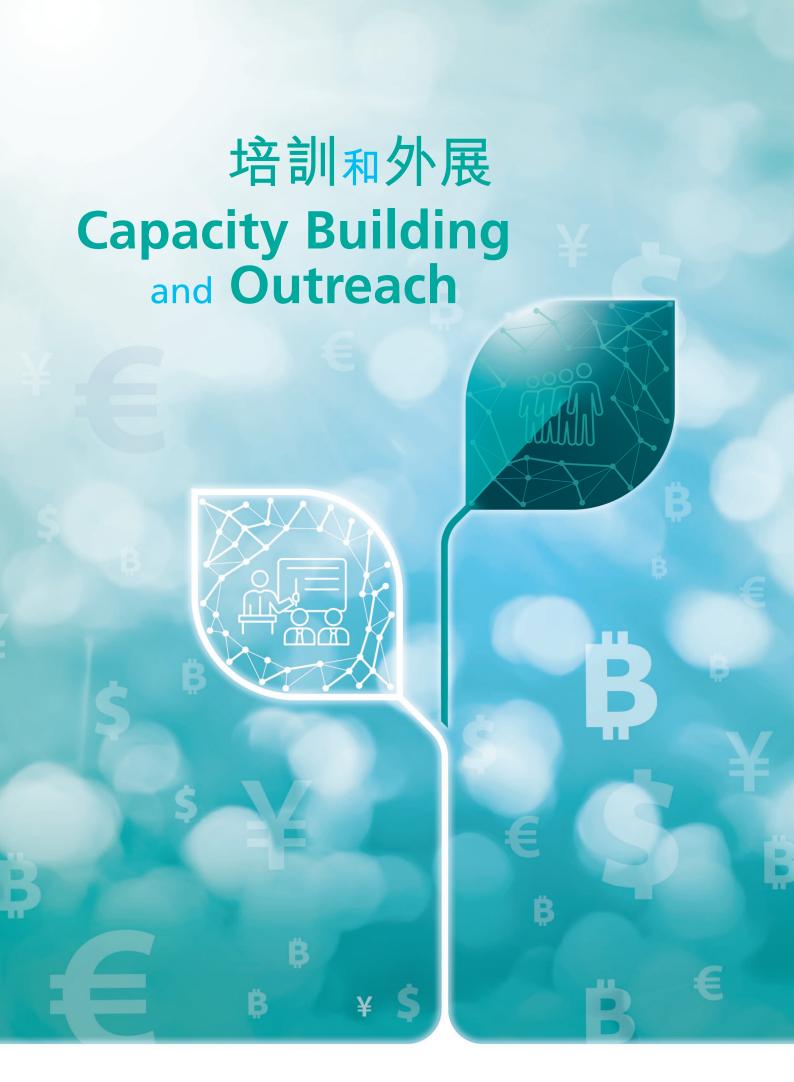
#### 與涉及金錢服務經營者的不明犯罪得益有關的洗錢案 Money Laundering in relation to crime proceeds of unknown sources involving money service operator

2021年4月,海關對一個本地洗錢集團展開調查,並拘捕6名成員。聯合財富情報組的財富情報顯示,由該等人士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,集團於2018年1月至2020年2月期間,在本港利用50個個人銀行帳戶接收共25億港元存款。兩名集團成員為一個本地金錢服務經營者的前僱員,涉嫌利用其商業網絡進行洗錢活動。相關調查仍在進行。

In April 2021, the C&ED conducted an investigation against a local money laundering syndicate and arrested six of its members. Financial intelligence from the JFIU suggested that significant sums of deposits with suspicious origins were received by the bank accounts held by these individuals. Extensive financial investigation revealed that they had made use of about 50 personal bank accounts in Hong Kong to receive HKD 2.5B of deposits in total between January 2018 and February 2020. Two syndicate members were found to be ex-employees of a local money service operator and they were suspected of using their business connections for the money laundering activities. Investigation is ongoing.

#### 洗錢集團 Money Laundering Syndicate





財富情報及調查科一直致力加強警隊內外的反洗錢能力,在2019冠狀病毒病疫情期間亦未有停下腳步。

The FIIB always supports in AML capacity building within and outwith HKPF. Our pace of knowledge sharing internally and externally has not been slowed down amidst COVID-19.

#### 財富調查課程

財富情報及調查科提供專門內部課程,提高人員對財富調查、財富情報分析和資產追討程序的專業知識。除了有關各種調查工具和技巧的講座外,課程亦按學員的需要提供模擬練習,讓人員在分析資金流和查詢財務狀況時更得心應手。

2021年6月及10月共舉辦了兩次為期五日的財富調查課程,超過200名來自香港警務處、香港海關、入境事務處、廉政公署及法證會計師辦事處的人員參加。

#### **Financial Investigation Course (FIC)**

The FIIB provides specialist in-house training with a view to boosting officers' professional knowledge on financial investigation, financial intelligence analysis as well as asset recovery procedures. Apart from lectures on various investigation tools and skills, the course also includes practical exercises which are tailor-made for trainees to gain hands-on experience in carrying out fund-flow analysis and financial profile inquiries.

Two five-day FICs were held in June and October 2021 respectively, and over 200 officers from the HKPF, the C&ED, the Immigration Department, the ICAC and the Forensic Accountants' Office participated in the courses.



110名來自警隊和其他執法機關的人員於2021年10月出席財富調查課程。 110 officers from the Force and other LEAs attended the FIC in October 2021





模擬練習課堂幫助參加者實 踐財富調查技巧。 The practical session allowed participants to develop hands-

#### 財富調查一天工作坊─初級

財富情報及調查科於2021年舉辦了十節 「財富調查一天工作坊—初級」。工作坊專 門為前線刑偵人員設計,以提升他們的財 富調查技巧。課堂以小班教學,集中講解 分析資金流的方法,幫助學員掌握相關工 具及技巧,以處理更頻繁且複雜的詐騙和 洗錢調查。

#### **One-day Financial Investigation** Workshop - Basic Level

The FIIB has tailor-made and hosted ten sessions of One-day Financial Investigation Workshop – Basic Level in 2021 to support frontline detective officers for enhancing their financial investigation skills. The course in small class approach focuses on the techniques of conducting fund-flow analysis, which equips trainees with the tools and skills in handling the more frequent and complex deception and money laundering investigations.



財富情報及調查科人員講授資金流分析。 FIIB officers delivered lectures on fund-flow analysis.

## 為外界持份者舉辦打擊洗錢 及恐怖分子資金籌集網絡研 討會

2021年7月,財富情報及調查科舉辦了兩個網上培訓課程,超過350名銀行業界人士和儲值支付工具持牌人出席。課程旨在提升業界對洗錢及恐怖分子資金籌集趨勢的意識,並加強他們識別可疑交易的能力。

# **AML/CFT Webinars to External Stakeholders**

In July 2021, over 350 participants from banks and SVFs took part in the two online training courses organised by the FIIB in updating their awareness of ML/TF trends in the territory and strengthening their skills in suspicious transaction identification.

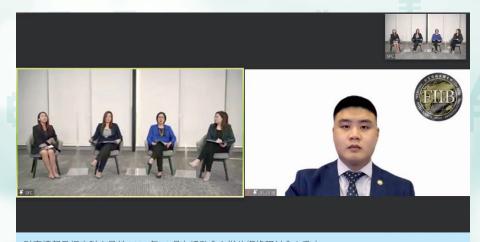


財富情報及調查科人員在網絡研 討會上分享全球恐怖分子資金籌 集概況。

FIIB officers shared the overview of the global terrorist financing situation during webinars.

財富情報及調查科一直與本地反洗錢單位維持合作伙伴關係,就打擊洗錢及恐怖分子資金籌集互相分享知識和經驗。財富情報及調查科人員於2021年在15場由其他持份者(如香港金融管理局和證券及期貨事務監察委員會等)舉辦的研討會上分享相關專業知識。

The FIIB constantly works in partnership with local AML comrades with the common interest of enhancing knowledge and sharing experiences on combatting ML/TF. FIIB officers shared their AML expertise in 15 seminars hosted by other stakeholders, such as the Hong Kong Monetary Authority and the SFC in 2021.



財富情報及調查科人員於2021年12月在證監會主辦的網絡研討會上發言。 FIIB officer spoke at a webinar hosted by the SFC in December 2021.



#### 與菲律賓及印尼駐香港領事 館代表聯繫

鑑於外傭被利用作洗錢罪行有上升趨勢, 財富情報及調查科人員於2021年8月與菲 律賓及印尼駐香港領事館人員會面,分享 洗錢案例及相關趨勢,亦為領事館日後的 宣傳及教育活動,特別設計印尼語及他加 祿語宣傳單張。

# Liaison with Representatives of the Philippine Consulate-General and the Indonesian Consulate-General

In view of the increased money laundering risks to which foreign workers may be exposed, FIIB officers met representatives of the Philippine Consulate-General and the Indonesian Consulate-General in August 2021, and shared money laundering case examples and key observations on the related crime trend. Antimoney laundering promotional leaflets with Indonesian and Tagalog translation tailor-made by FIIB were also presented to representatives of the Consulates-General for their future publicity campaigns.



財富情報及調查科人員與印尼駐港總領事館副領事(禮賓及領事)Hernawan Bagaskoro Abid(右二)及警察聯絡專員Agung Wahyudi(右三)交換紀念品。

Officers of FIIB exchanged souvenirs with Vice Consul (Protocol & Consular) Mr. Hernawan Bagaskoro Abid (second right) and Police Liaison Officer Mr. Agung Wahyudi (third right) of the Consulate General of the Republic of Indonesia in Hong Kong.



財富情報及調查科人員與菲律賓 駐香港領事館的代表交流打擊洗 錢罪行的策略。

FIIB officers and the representatives of the Philippine Consulate-General discussed anti-money laundering strategies.

#### 2021 粤港澳大灣區反洗錢 論壇

# **Guangdong-Hong Kong-Macao Greater Bay Area AML Summit 2021**

The Guangdong-Hong Kong-Macao Greater Bay Area AML Summit aims to establish an AML platform in enhancing exchange and co-operation amongst the three jurisdictions. Chief Superintendent of FIIB led officers to attend the Summit, in which speakers from various Government authorities, regulators, private sectors and scholars of the Greater Bay Area shared actionable strategies and solutions on issues of cross-border AML cooperation, money laundering risk management and the basis of AML development under the theme of 'One Country, Two Systems and Three Wins'. Officers of FIIB also participated in an exchange meeting amongst the law enforcement agencies and regulators in the Greater Bay Area and deliberated on co-operation enhancement in areas including ML/TF risk assessment, financial intelligence exchange and case referral mechanism.



財富情報及調查科人員於2021年10月 出席大灣區反洗錢論壇。(相片提供: 中國平安)

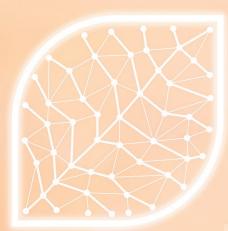
FIIB officers attended the Greater Bay AML Summit in October 2021. (Photo Credit: Ping An Group)



財富情報及調查科人員在大灣區反洗錢論壇分享最新的洗錢趨勢及類型學。(相片提供:中國平安)

FIIB officer shared the latest ML trend and typologies in the Greater Bay AML Summit. (Photo Credit: Ping An Group)

# 「守戶者聯盟」 Project AccFencers









財富情報及調查科一直守在打擊洗錢及恐怖分子資金籌集行動的最前線。有賴各打擊洗錢及恐怖分子資金籌集持份者同心合力,才得以順利阻截及關查相關罪案。為凝聚業界與實行,財富情報及調查相關,共同打擊洗黑錢明之2021年起展開「守戶者則重(Project AccFencers)」,其中「Acc」取自戶口的英文「Account」,「Fencers」則有劍擊比賽中攻防兼備之意。

首個「反洗黑錢月」已於2021年11月至12月舉行,包括一系列外展活動、培訓及執法行動。

The FIIB has always been at the forefront in operationally combatting ML/TF activities. Our performance in crime deterrence and detection would have never been stellar without the concerted effort of other AML/CFT stakeholders. With a view to rallying the support of the industries and the public to combat money laundering crimes, the FIIB has initiated 'Project AccFencers' – "Acc" stands for "Account" and "Fencers" implies attack and defence in a fencing game since 2021.

Our very first Anti-Money Laundering Month (AML Month) was held between November and December 2021, comprising a series of outreach activities, training and law enforcement actions.



## 反洗黑錢月啟動禮暨標語設計比賽頒獎典禮 AML Month Kick-off cum Slogan Design Competition Presentation Ceremony

「反洗黑錢月2021」於2021年11月24日舉辦的反洗黑錢月啟動禮暨標語設計比賽頒獎典禮正式展開。啟動禮有約200名金融及銀行業界代表出席,象徵所有反洗黑錢持份者目標一致,共同打擊洗黑錢及金融罪行。在典禮上,標語設計比賽最後五強獲邀到台上分享創作理念,並隨即由現場觀眾投票選出優勝作品。比賽競爭激烈,最後由美國運通國際股份有限公司奪得冠軍,得獎標語為「可疑資金四圍轉,舉報黑錢可截斷」。

The commencement of AML Month 2021 was marked by the Kick-off cum Slogan Design Competition Presentation Ceremony held on 24 November 2021. The launching ceremony, attended by two hundred-odd representatives from the financial and banking sectors, symbolised the unity of all AML stakeholders with the common goal of fighting money laundering and financial crimes. During the ceremony, top five slogan design finalists were invited on stage to share their concepts and a live audience voting took place afterwards. The close-run competition was won by representatives from the American Express International, Inc. with the slogan "Tainted money keeps circling around. Report to keep Hong Kong safe and sound."

警務處處長蕭澤頤(中)、財經事務及庫務局副秘書長 (財經事務)陳穎韶(左)及保安局首席助理秘書長(禁毒) 黎明暉(右)主持啟動儀式。

The launching ceremony was officiated by Mr. SIU Chak-yee (centre), Commissioner of Police, Ms. CHAN Wing-shiu (left), Deputy Secretary (Financial Services) for Financial Services and the Treasury Bureau and Mr. LAI Ming-fai (right), Principal Assistant Secretary (Narcotics) for the Security Bureau.



約200名嘉賓出席啟動禮。 Around two hundred guests attended the ceremony.

## 優勝隊伍Winning Teams

서양 구조	A
7797 1 🖂	<b>Awards</b>
	Awalus

<b>契項 Awarus</b>		
冠軍 Champion	美國運通國際股份有限公司 American Express International, Inc.	可疑資金四圍轉 舉報黑錢可截斷 Tainted money keeps circling around Report to keep Hong Kong safe and sound
亞軍 First Runner-up	中國工商銀行 (亞洲) 有限公司 Industrial and Commercial Bank of China (Asia) Limited	洗錢陷阱要辨識 金融犯罪齊打擊 Detect attempts at money laundering Fighting financial crime, together
季軍 Second Runner-up	中國銀行(香港)有限公司 Bank of China (Hong Kong) Limited	各界攜手反洗錢 涉恐資金不可沾 Combat Against Money Laundering Fight Against Terrorist Financing
<b>優異獎</b> Merit	Mox Bank Limited	買賣戶口搵快錢 人生從此蒙污點 Account lending for once Criminal stain for life
	中國建設銀行 (亞洲) 股份有限公司 China Construction Bank (Asia) Corporation Limited	銀行戶口亂借人 第日坐監咪怨人 Lending Account To Someone Else No One To Blame Yourself
最 <b>踌躍參與銀行獎</b> Most Active Participation Bank Award	平安壹賬通銀行(香港)有限公司 Ping An OneConnect Bank (Hong Kong) Limited	
最踴躍參與儲值支付工具獎 Most Active Participation Stored Value Facility Award	支付寶(香港) Alipay Financial Services (HK) Limited	



美國運通國際股份有限公司代表 奪得標語設計比賽冠軍。 Representatives from the American Express International, Inc. won the AML Slogan Competition.

## 宣傳工作 Publicity Work

財富情報及調查科舉辦了一系列反洗黑錢宣傳工作,以提高市民打擊洗錢及恐怖分子資金籌集的意識。

The FIIB organised a wide range of AML publicity activities to raise public awareness of AML/CFT.



「守戶者聯盟」宣傳車到全港多區宣傳反洗黑錢 信息。

"Project AccFencers" promotional truck travelled around Hong Kong to disseminate anti-money laundering messages.



財富情報及調查科製作了微影片在 警隊社交媒體平台上發布,提醒市 民干犯洗黑錢罪的後果。

The FIIB created a short AML promotional video clip that reminds the public about the consequence of involving in ML crimes. The video was launched on the Force's social media platforms.





財富情報及調查科人員到全港多個地點向市民派發宣傳單張及紀念品,並講解干犯洗黑錢罪的刑罰。 Officers of the FIIB distributed leaflets and souvenirs to the public and explained the penalties for money laundering offences at hotspots in town.



財富情報及調查科人員與印尼駐港總領事館領事 Agung Wahyudi(右一)進行網上直播活動,向非華裔群宣揚反洗黑錢信息。

FIIB officers spread anti-money laundering messages to non-ethnic Chinese community in a live streaming event with Consul of the Consulate General of the Republic of Indonesia in Hong Kong Mr. Agung Wahyudi (first right).





財富情報及調查科人員到多個公營機構舉辦 講座,為學生、長者、非華裔社群及在職智 障人士宣傳反洗黑錢信息。

Seminars given by officers of the FIIB were held at various public organisations to promote AML messages to students, the elderly, the nonethnic Chinese community and working persons with intellectual disabilities.



Fifteen buses with advertisement printed on their side panels spread AML messages to business districts and residential areas in Hong Kong.







財富情報及調查科採取代號為「雋語行動」的拘捕行動,成功瓦解多個涉及洗黑錢的犯罪集團。 行動中有172人因洗黑錢罪被捕,總值港幣7億6千2百萬元的資產已被防止轉移。

The FIIB mounted arrest operation codenamed Operation WISEWORD and neutralised a number of criminal syndicates engaging in ML activities. 172 persons were arrested for Money Laundering and assets amounting to HKD 762M were prevented from dissipation throughout the operation.



反洗黑錢月期間與證監會及新加坡當局採取聯合行動新聞簡報會。 Press briefing on a joint operation with SFC and Singaporean authorities during the AML Month.



「守戶者聯盟」及反洗黑錢月新聞簡報會。 Press briefing for Project AccFencers and the AML month.



簡稱 Abbreviations	English	中文
AML	Anti-Money Laundering	打擊清洗黑錢/打擊洗錢/ 反洗黑錢
APG	Asia/Pacific Group on Money Laundering	亞洲/太平洋反清洗黑錢組織(亞太反洗錢組織)
C&ED	Customs and Excise Department	香港海關
CFT	Counter-Financing of Terrorism	反恐籌資
COVID-19	Coronavirus Disease 2019	2019冠狀病毒病/ 新型冠狀病毒病
DNFBPs	Designated Non-Financial Businesses and Professions	指定非金融企業及行業
<b>Egmont Group</b>	The Egmont Group of Financial Intelligence Units	埃格蒙特組織
FATF	Financial Action Task Force	財務行動特別組織(特別組織)
FDAP	Financial Data Analytic Platform	財務數據分析平台
FI HQ	Financial Investigation Headquarters	財富調查總部
FIC	Financial Investigation Course	財富調查課程
FID	Financial Investigation Division	財富調查組
FIIB	Financial Intelligence and Investigation Bureau	財富情報及調查科
FinTech	Financial Technology	金融科技
Fls	Financial Institutions	金融機構
FIUs	Financial Intelligence Units	財富情報單位
FSRB	FATF-Style Regional Body	特別組織形式相若的地區組織
FSTB	Financial Services and the Treasury Bureau	財經事務及庫務局
HKPF	Hong Kong Police Force	香港警務處
HRA	Hong Kong's Money Laundering and Terrorist Financing Risk Assessment	香港洗錢及恐怖分子資金籌集 風險評估
ICAC	Independent Commission Against Corruption	廉政公署
JFIU	Joint Financial Intelligence Unit	聯合財富情報組
LEAs	Law Enforcement Agencies	執法機關/執法部門
MASAK	The Financial Crimes Investigation Board (The Turkish Financial Intelligence Unit)	土耳其金融犯罪調查委員會
ME	Mutual Evaluation	相互評核/相互評估
ML	Money Laundering	清洗黑錢/洗錢
MoU	Memorandum of Understanding	諒解備忘錄
MSO	Money Service Operator	金錢服務經營者
PLGS	100% Personal Loan Guarantee Scheme	百分百擔保個人特惠貸款計劃
SFC	Securities and Futures Commission	證券及期貨事務監察委員會
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
TF	Terrorist Financing	恐怖分子資金籌集
VAs	Virtual Assets	虚擬資產
VASP	Virtual Asset Service Provider	虚擬資產服務提供者

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