

# 睿智同心 追跡尋真

Uncommon Minds with Common Goal Trace the Untraceable





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# 財富情報及調查科主管序言 Message from Head of FIIB

對於財富情報及調查科而言,2024年可 謂挑戰重重,收穫滿滿;儘管金融罪行的 威脅多變,我們仍繼續應對,致力維護香 港金融體系的穩健。科技發展日新月異, 犯案手法日見精密,均需本科靈活迅速應 對;為此,我們竭力提升自身能力,加強 合作和科創應用,以維持本科在財富情報 和執法方面的領導地位。 2024 marked a period of significant challenges and achievements for the Financial Intelligence and Investigation Bureau ("FIIB") as we continued to confront evolving financial crime threats while reinforcing Hong Kong's financial integrity. Rapid technological advancement and sophisticated criminal methodologies demanded agile responses. Through enhanced capabilities, strengthened collaboration and technological innovation, FIIB maintained its leadership in financial intelligence and enforcement.

### 金融罪行環境瞬息萬變

香港的洗黑錢環境持續複雜多變,而詐騙 罪行仍是主要威脅。2024年,香港錄得 44,480宗詐騙案,佔整體94,747宗罪案的 逾46%,同時亦佔與洗黑錢調查相關的上 游罪行之90%。錢騾網絡衍生詐騙的情況 亦顯著增多。年內,共有8.607人因洗黑錢 罪行而被捕,按年由5,977人急增44%, 當中有89.23%為傀儡戶口持有人(俗稱「 錢騾」)。香港憑藉其策略性地利優勢、 自由經濟體系、低税制及高效金融市場, 成功增加其全球吸引力,但亦惹來不法之 徒的覬覦,企圖以跨司法管轄區的方式, 轉移和藏匿非法資金。同時,洗黑錢手法 和渠道亦更多元化。儘管傳統銀行體系仍 是最常見的途徑,惟不當使用虛擬資產( 尤其利用穩定幣清洗非法資金)的情況亦 明顯增多,突顯其速度、匿名性及全球覆 蓋面的特質,使之愈來愈廣為不法分子所 用。此番轉變反映我們既要多管齊下打擊 傀儡戶口,亦要以穩健的監管措施及國際 合作,方能應對現今多變的跨國洗黑錢活 動。

### **Evolving Financial Crime Landscape**

Money laundering ("ML") in Hong Kong continued to evolve, with deception remaining a dominant threat. In 2024, 44,480 deception cases were reported in Hong Kong, accounting for over 46% of the 94,747 total crime cases, as well as 90% of the predicate offences associated with ML investigation. The role of money mule networks in enabling fraud also saw a significant increase. In 2024, 8,607 persons were arrested for ML, representing a 44% increase from 5,977 persons in 2023. Among them, 89.23% were stooge account holders (or socalled "money mule"). While Hong Kong's strategic location, free economy, low tax system and efficient financial market bolster its global appeal, these features also make it an attractive hub for criminals moving and concealing illicit funds across jurisdictions. Meanwhile, ML methods and channels became more diverse. Traditional banking systems remained a popular choice; however, there was a marked rise in the misuse of virtual assets ("VAs"), in particular, the exploitation of stablecoins in laundering illicit funds, highlighting their growing popularity among criminals due to their speed, anonymity and global reach. This shift underscored the need for a multi-faceted approach against stooge accounts, robust regulatory measures and international co-operation to address the dynamic and transnational nature of modern ML.

## 可疑交易報告數目升幅 空前

### 加強國際合作

打擊跨國金融罪行需要緊密的跨境合作。2024年,本科深化與各財富情報單位、監管機構及執法機關等本地和全球持份者的合作,促進**情報分享、聯合調查和最佳做法交流**,提升自身打擊跨境威脅的整體能力。

為鞏固香港在全球打擊金融罪行方面的地 位,本科積極參與國際組織,包括財務行 動特別組織(「特別組織」)、埃格蒙特 金融情報組織(「埃格蒙特組織」)及國 際刑警組織。年內,已與墨西哥共同主導 特別組織的標誌性專案一「國家洗黑錢風 險評估指引修訂專案」,帶領該組織逾30 個代表團及國際組織所組成的歷來最大規 模專案組。經修訂的《國家洗黑錢風險評 估指引》為全球網路提供基本風險評估工 具及最佳做法,直接支援新一輪相互評估 周期的工作。此番成果不僅完善全球反洗 黑錢及恐怖分子資金籌集的架構,亦彰顯 我們在確立相關國際標準方面的思想領導 地位。本科一名警司更獲委任為新一輪相 互評估的首批評核人員之一,為日後的相 互評估樹立早期有影響力的先例,令我們 深感驕傲。

# **Unprecedented Surge in Suspicious Transaction Reports**

In 2024, the Joint Financial Intelligence Unit ("JFIU") witnessed an unprecedented surge in the number of suspicious transaction reports ("STRs"), reflecting the community's heightened vigilance. This rise coincided with an alarming surge in different types of deception cases. Financial institutions ("FIs") and law enforcement agencies ("LEAs") implemented various enhanced anti-deception measures by leveraging advanced analytics such as artificial intelligence ("AI") to detect suspicious transactions more efficiently. The information submitted in STRs reflected a greater degree of vigilance by the reporting entities on accounts or transactions, while the quality of STR submissions proved instrumental in further investigation by LEAs in dismantling ML syndicates and disrupting criminal networks, demonstrating the success of Hong Kong's anti-money laundering and counter-financing of terrorism ("AML/CFT") framework.

# **Strengthening International Partnerships**

Financial crime, being inherently transnational, requires close collaboration beyond Hong Kong's borders. Throughout 2024, FIIB deepened partnerships with local and international stakeholders, including financial intelligence units ("FIUs"), regulators and LEAs. These alliances facilitated intelligence sharing, joint investigation and the exchange of best practices, amplifying our collective ability to combat cross-border threats.

Our engagement with international bodies, such as the Financial Action Task Force ("FATF"), the Egmont Group of Financial Intelligence Units ("Egmont Group") and INTERPOL, has reinforced the role of Hong Kong in the international fight against financial crime. In 2024, FIIB co-led an iconic FATF project with Mexico, titled "Money Laundering National Risk Assessment Guidance Update" ("ML NRA Guidance Update"), spearheading an unprecedentedly diverse coalition of over 30 delegations and international bodies in FATF. The updated Guidance provides the Global Network with essential risk assessment tools and best practices, directly supporting the new mutual evaluation ("ME") cycle. This achievement not only strengthens the global AML/CFT framework but also underscores our thought leadership in shaping international standards. We are also proud that our Superintendent of Police was among the first ME Assessors appointed for the new round, setting an early, influential precedent for future MEs.

# 借助科技 加強財富情 報工作

2024年,本科的首要任務之一是提升數據 分析能力,以應對日增的金融罪案且多變 的洗黑錢及恐怖分子資金籌集環境。財務 數據分析平台(FDAP)於2021年獲立法 會撥款開發,旨在借助先進技術和大數據 分析,加強財富情報系統的分析能力,正 好標誌着我們在這方面取得重大進展。

該平台將於2025年至2027年分階段推行,提供自動化的人工智能情報處理系統,包括第二代可疑交易報告管理系統(STREAMS 2),務求進一步提升自身的財富情報分析能力,有助後續的發布和拓展工作。本科亦正開發與其他政府系統的對接界面,以便將人手工序自動化,繼而透過無縫數據操作提速提效。此等創新項目將確保我們站在防範金融罪行的最前線。

### 全社會合作:成功基石

預防金融罪行需要**全社會合作**,故本科持續與公私營界別促進更密切的伙伴關係。 年內,已舉辦各項**業界研討會、工作坊、 外展活動及培訓課程**,冀提高業界持份者 的相關意識和舉報效率。

為加快洗黑錢案件的檢控流程,警隊與律政司緊密合作,令年內的檢控數字大大增加。為提升針對錢騾對干犯洗黑錢罪行的阻嚇力,我們更會主動就洗黑錢定罪案件申請加刑;就最嚴重的案件而言,此舉已將刑罰加重至33%。

# **Advancing Financial Intelligence with Technology**

A key priority in 2024 was enhancing FIIB's data analytics capabilities to stay ahead of the increasing number of financial crimes and the evolving landscape of ML and terrorist financing ("TF"). The Financial Data Analytics Platform ("FDAP"), with funding approval by the Legislative Council in 2021, represented a major leap forward. FDAP aims to strengthen the analytical capabilities of financial intelligence systems through advanced technology and big data analytics.

FDAP will be rolled out in phases between 2025 and 2027 to provide an Al-powered intelligence processing system with a high degree of automation, including the Suspicious Transaction Report and Management System 2 ("STREAMS 2"), further improving our ability to analyse financial intelligence for dissemination and development. We are also developing integrated interfaces with other government systems to automate manual process, thereby optimising operational efficiency and effectiveness through seamless data operability. These innovations will ensure we stay at the forefront of financial crime prevention.

# Whole-of-society Collaboration: A Cornerstone of Success

Recognising that financial crime prevention requires a whole-of-society approach, FIIB continues to foster close working relationships with the public and private sectors. Throughout 2024, sectoral forums, workshops, outreach and training sessions were held for industry stakeholders to raise their awareness and optimise their reporting efficiency.

A flagship initiative was the Financial Intelligence Evaluation Sharing Tool ("FINEST"), a bank-to-bank information sharing platform for participating institutions to share information on suspicious accounts. Currently, 10 major banks contribute data, significantly improving the prevention and detection of fraud and mule accounts. We are working with the Hong Kong Monetary Authority ("HKMA") to expand the participant base. Furthermore, the Government has recently amended the Banking Ordinance (Cap. 155) to provide legal backing for broader sharing of information including personal account data by banks for crime prevention and detection. In collaboration with the working group comprising HKMA and the Hong Kong Association of Banks, we are enhancing FINEST to cater to the growing demand for data capacity and accessibility.

Beyond that, we have also strengthened our collaboration with the Department of Justice ("DoJ") to streamline the prosecution process for ML cases, resulting in a substantial increase in the number of relevant prosecutions. To enhance the deterrent effect against money mules, we have actively pursued heavier sentences in convicted ML cases involving stooge accounts. In the most serious instances, this approach has led to sentences being raised by over 33%.

### 加強宣傳教育

加強宣傳教育仍是打擊洗黑錢及恐怖分子 資金籌集的關鍵。本科已優先為反洗黑錢 專業人士/合規人員舉辦外展活動,提及 培訓,內容關乎如何偵測可疑洗黑錢 時分子資金籌集活動和提交具質素的 交易報告。「反洗黑錢 對性措施(包括為容易被利用的 是 舉辦講座及活動)和反洗黑錢漫畫《 監 附》及微電影《左右人生》等創意宣傳 則帶出牽涉洗黑錢活動的真實後果。

為交換情報和訂立應對措施,本科已透過 多項活動,促進與各政府決策局、監管機 構和行業的合作,例如於「金融業反洗黑 錢研討會2024」特設反洗黑錢策略和科技 的專題小組討論。另於各跨境口岸、銀行 和社交媒體發放公眾宣傳資料,以廣 與之效;同時,亦為特定高危社群增設 個人化溝通渠道,進一步提高其反洗黑錢 識,促進具警覺性、穩健的生態圈,以打 擊洗黑錢威脅。

# 應對日後挑戰:全方位 策略

鑑於跨境洗黑錢活動日見精密,本科即將 優先擴大與本地和海外伙伴的策略性合作 範圍,以加強情報搜集和聯合行動,而工 作重心之一便是深化與虛擬資產服務提供 者的伙伴關係,尤其考慮到穩定幣發行人 發牌制度等新監管制度的發展,我們會與 相關機構通力合作,確保與該行業有效溝 通。另亦會確保財務數據分析平台的組成 系統如期推出,鞏固自身打擊洗黑錢及恐 怖分子資金籌集的能力。我們踏入新一輪 相互評估周期後,已意識到特別組織的標 準有重大演變,故會與財經事務及庫務局 和其他機構緊密合作,確保有關制度符合 國際反洗黑錢及恐怖分子資金籌集的最新 標準。值得一提的是,本科將與中國人民 銀行及澳門對口單位展開首個大灣區洗錢 及恐怖分子資金籌集風險評估,冀增進人 員對相關跨境風險的了解。

# **Stepping Up Education and Awareness**

Enhancing education and awareness remains critical in combating ML/TF. FIIB has prioritised capacity building for AML professionals/ compliance staff on the detection of suspected ML/TF activities and the quality reporting of suspicious transactions through outreach sessions. Public awareness campaigns, such as "AML Month", emphasise the felony status of renting, lending or selling bank accounts, while targeted initiatives, including seminars and activities for vulnerable groups, as well as creative efforts like the AML comic, The Dirty Money Trap, and the AML microfilm, Your Life, Your Choice, highlight real-life consequences of ML involvement.

FIIB also collaborates with government bureaux, regulators and industries to exchange intelligence and develop countermeasures through events like the Financial Institutions AML Forum 2024 featuring panels on AML strategies and technology. Public awareness materials have been disseminated across cross-boundary points, banks and social media to broaden outreach. Additionally, hyper-personalised communication tailored to specific risk groups further strengthens AML awareness and fosters a vigilant and resilient ecosystem against ML threats.

# **Tackling the Upcoming Challenges: A Holistic Approach**

Given the increasingly complex and cross-border nature of ML activities, FIIB will prioritise expanding strategic collaboration with local and overseas partners to enhance intelligence gathering and joint operations in the coming future. A key focus will be strengthening partnerships with virtual asset service providers ("VASPs"), particularly in light of emerging regulatory developments such as the licensing regime for stablecoin issuers. We will work closely with relevant agencies to ensure effective engagement with the sector. Additionally, we will ensure the timely rollout of FDAP components to consolidate our AML/CFT capacity. As we have entered the new ME cycle, we recognise that FATF standards have evolved significantly. To ensure our compliance with the latest international AML/CFT standards, we will maintain close collaboration with the Financial Services and the Treasury Bureau ("FSTB"), as well as other agencies. Notably, we will also collaborate with the People's Bank of China and Macao counterparts on a pioneering Greater Bay Area ML/TF Risk Assessment, enhancing our insights into cross-boundary ML/TF risks.

# 鳴謝本科團隊及伙伴的 支持

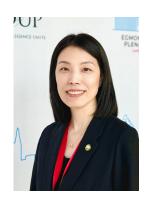
回顧2024年的成果之際,現謹向本科全員及各持份者衷心致謝;全憑各位的堅定決心、不懈努力,本科方能取得各項佳績。各方眾志成城、群策群力,一直推動我們邁步向前,此番共同努力對維護香港的金融制度亦同樣重要。

展望將來,本科定必乘勢繼往開來,以科技引領,合作共贏,創新突破,防範新興威脅。今後,只要大家齊心協力,定能確保香港的金融體系仍然領先全球。

### **Acknowledging Our Team and Partners**

Reflecting on the achievements in 2024 calls for our deepest appreciation to our dedicated staff and valued stakeholders. The successes we realised are a direct result of your unwavering dedication, tireless efforts and steadfast commitment. Your collective focus and collaborative spirit have been fundamental to our progress; these joint endeavours have been vital in safeguarding Hong Kong's financial system.

Looking ahead, we will build on this momentum, leveraging technology, partnerships and innovation to stay ahead of emerging threats. Together, we are ensuring that Hong Kong remains a global leader in financial integrity.



鄭麗琪女士 香港警務處 財富情報及調查科 總警司 CHENG Lai-ki, Kelly Head of FIIB

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Financial Intelligence and Investigation Bureau and Joint Financial Intelligence Unit 財富情報及調查科及聯合財富情報組

# 財富情報及調查科

Financial Intelligence and Investigation Bureau

# 抱負及使命 Vision and Mission

# 抱負 Vision

維護香港作為國際金融中心的聲譽,確保本港能繼續提供廉潔安全的營商環境

To safeguard the reputation of Hong Kong as an international financial centre by ensuring a clean and safe business environment.

# 使命 Mission

致力協助政府保障香港免受洗黑錢及恐怖分子資金籌集活動的影響,方法包括:

To assist the Government in its efforts to protect Hong Kong from ML/TF by:

- 就本地及跨境洗黑錢集團進行財富調查並追討資產
   Conducting financial investigation and pursuing asset recovery from local ML syndicates and those operating across borders
- 加強與本地及國際機構合作,促進財富情報交流
   Fostering and strengthening co-operation with local and international agencies in the exchange of financial intelligence
- 進行洗錢及恐怖分子資金籌集風險評估,確保有關制度符合相關的國際標準 Conducting ML/TF risk assessment and ensuring compliance with relevant international AML/CFT standards
- 借助先進科技,提高情報成果的質素
   Harnessing advanced technology to enhance the quality of intelligence output
- 增進相關行業對洗黑錢及恐怖分子資金籌集問題的認識和了解
   Upgrading relevant sectors' awareness and understanding of ML and TF issues
- 加強警隊內外的培訓,提升各界打擊洗黑錢及恐怖分子資金籌集的能力 Enhancing AML/CFT training and capacity-building efforts both within and beyond the Force



### 本科角色

為加強警隊的財富調查及情報分析能力, 並維護香港的打擊洗黑錢和恐怖分子資金 籌集制度,財富情報及調查科於2021年正 式成立。

### 本科歷史

香港首條反洗黑錢法例《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,為本港專 責接收、分析和發布可疑交易 報告的單位。

毒品調查科和有組織罪案及三 合會調查科各自的財富調查組 合併成毒品調查科財富調查 組,務求善用資源,提高打擊 洗黑錢及恐怖分子資金籌集的 效率。

毒品調查科洗黑錢及恐怖分子 資金籌集風險評估小組正式成 立,並開設1個高級警司(財 富調查)職位。

為提升警隊打擊金融罪行的能力,毒品調查科財富調查組及聯合財富情報組於2020年10月重組架構並增設總部,為日後成立財富情報及調查科奠定基礎。

為進一步加強香港打擊洗黑錢 及恐怖分子資金籌集的能力, 財富情報及調查科於2021年 6月1日正式成立,隸屬刑事 部,下設財富調查組、聯合財 富情報組及總部。

### **Our Role**

To enhance the Force's capabilities in financial investigation and intelligence analysis and to safeguard Hong Kong's AML/CFT regime, FIIB was formally established in 2021.

### **Our History**

年份 Year

1989

1994

2004

2013

2020

2021

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

The enactment of the second piece of AML legislation in Hong Kong, the Organized and Serious Crimes Ordinance (Cap. 455), aimed at combating ML involving the proceeds of indictable offences in Hong Kong and similar conduct worldwide. It further empowered the role of JFIU to manage the suspicious transaction reporting regime. A Financial Investigation Unit was formed under the Organized Crime and Triad Bureau ("OCTB") to tackle the laundering of proceeds from organised and serious crime.

The Financial Investigation Units of NB and OCTB were merged to form the Financial Investigation Division ("FID") under NB. This amalgamation achieved greater efficiency and more effective use of resources in combating ML /TF.

The Money Laundering and Terrorist Financing Risk Assessment Unit was established under NB, together with the creation of a post of Senior Superintendent of Police (Financial Investigation).

To enhance the Force's capability in combating financial crime, both FID and JFIU under NB were restructured in October 2020, with the creation of a new division, Headquarters("HQ"), laying a foundation for the establishment of FIIB.

On June 1, 2021, FIIB was established under the Crime Wing by amalgamating FID, JFIU and HQ, with a view to further strengthening Hong Kong's AML/CFT capability.

### 本科架構

### **Our Organisation**

財富情報及調查科總警司 Chief Superintendent of Police, FIIB

財富情報及調查科高級警司 Senior Superintendent of Police, FIIB

#### 財富調查組警司 Superintendent of Police, FID

洗錢及恐怖分子資金籌集活動的調查、檢控及資產沒收事宜(包括相互法律協助的請求)

ML/TF investigation, prosecution and asset confiscation (including requests for mutual legal assistance)

#### 聯合財富調查組警司 Superintendent of Police, JFIU

- 與金融機構聯繫
   Liaison with Fls
- 情報交流 Intelligence exchange
- 積極堵截集團式罪行及洗錢 活動
   Proactive interdiction of syndicated crime and ML activities
- 處理可疑交易報告和運作 可疑交易報告管理系統 (STREAMS)
   STR processing and STREAMS maintenance

#### 總部警司 Superintendent of Police, HQ

- 反洗錢及恐怖分子資金籌集 的政策和合作 AML/CFT policy and cooperation
- 洗錢及恐怖分子資金籌集風 險評估
   ML/TF risk assessment
- 策略分析 Strategic analysis
- 宣傳、培訓及外展 Publicity, training and outreach

# 聯合財富情報組

**Joint Financial Intelligence Unit** 

### 該組角色

### JFIU's Role

JFIU, jointly staffed by HKPF and the Customs and Excise Department ("C&ED"), functions as a law enforcement-type FIU rather than an investigative unit. As the sole agency managing the suspicious transaction reporting regime in Hong Kong, it also engages in financial intelligence exchanges with FIUs and LEAs worldwide. Distinctive in its intelligence analysis capabilities and perspectives, JFIU contributes to Hong Kong's AML/CFT regime through close inter-agency collaboration with government bureaux and departments, financial regulators, FIs, designated non-financial businesses and professions ("DNFBPs"), as well as other professional bodies.

### 該組職責

該組會因應持續的內外風險評估,履行廣 泛職務,以打擊和防範洗黑錢、相關上游 罪行及恐怖分子資金籌集活動。有關職務 包括:

- 就可疑交易報告作行動分析後將之發布
- 就財富情報作策略分析和國際交流
- 運作可疑交易報告管理系統
- 採取臨時措施,以防有人繼續處理非 法得益

### **JFIU's Charter**

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
- · Strategic analysis and global exchange of financial intelligence
- Operation of the Suspicious Transaction Report and Management System ("STREAMS")
- Implementation of provisional measures to prevent further dealing of illicit proceeds

Joint Financial Intelligence Unit Highlights 聯合財富情報組工作報告

# 聯合財富情報組工作摘要 JFIU Highlights



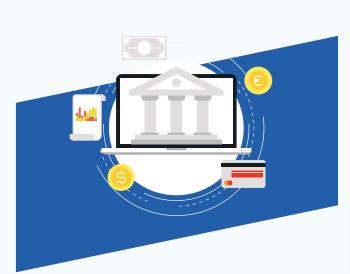
147,660 gtrs

處理可疑交易報告 were processed



89%

由銀行業(包括數字銀行)提交 were filed by the banking sector (including digital banks)



90.2% 可疑交易報告 of STRs

經電子方式提交 were filed via e-submission



45,376 gtrs

經發佈可疑交易報告 were disseminated



**30.7%** 可疑交易報告已發布 of STRs were disseminated

其中, Of these, **94.2%** 轉交香港警務處 各調查單位 were referred to different investigation

units of HKPF



1,960 次財富情報交換 exchanges of financial intelligence

由聯合財富情報組與全球財富情報單位進行 were made between JFIU & FIUs worldwide

包括, Including, **1,041** 次接獲交換情報 incoming exchanges **919** 次發出交換情報 outgoing exchanges



15 份諒解備忘錄或協議 MOUs or agreements

已與海外財富情報單位/執法機關簽訂(截至2024年) were signed with overseas FIUs/LEAs (as at 2024)



**23** 場反洗錢及恐怖分子資金籌集講座已 圓滿舉行

AML/CFT seminars were held 向各界傳遞舉報可疑交易的主要信息 to convey key messages on suspicious transaction reporting to various sectors

### 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)全部或可公訴罪行得益,或恐怖分子財產;(b)曾在與販毒、可公訴罪行或恐怖主義行為有關的情況下使用;或(c)擬在與販毒、下使用,則必須在合理範圍內盡快把該知馬東內容,向獲授權人(即聯合財富情報組人員)披露(即舉報可疑交易)。

聯合財富情報組每接獲可疑交易報告,便會按風險為本的評估機制審視內容,包括可疑情況、嚴重程度和風險水平,並進行情報分析。除了向有關舉報機構提出建議外,亦會從報告發掘具價值的情報及/或將之轉交執法機關或其他機構的調查子資金籌集活動。該組另亦致力使反洗錢及恐怖分子資金籌集持份者了解最新的可疑交易指標及個案類型。

# **Legal Basis for Suspicious Transaction Reporting**

Pursuant to sections 25A(1) of both the Drug Trafficking (Recovery of Proceeds) Ordinance (Cap. 405) and the Organized and Serious Crimes Ordinance (Cap. 455), as well as section 12(1) of the United Nations (Anti-Terrorism Measures) Ordinance (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 drug trafficking or an indictable offence, or terrorist property; (b) was used in connection with drug trafficking, an indictable offence or a terrorist act; or (c) is intended to be used in connection with drug trafficking, an indictable offence or a terrorist act, he shall as soon as it is reasonable for him to do so disclose that knowledge or suspicion (i.e. by way of suspicious transaction reporting) to an authorized officer (i.e. JFIU officer).

On receipt of each STR, JFIU will examine various aspects, including its degree of suspicion, severity and level of risk, and conduct intelligence analysis in accordance with its risk-based assessment mechanism. 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 for intervention and disruption of ML/TF activities. JFIU also endeavours to keep AML/CFT stakeholders abreast of recent suspicious indicators and emerging case typologies.

### 接獲可疑交易報告

2024年,該組共接獲147,660份可疑交易報告,按年急增51.3%(+50,083份)。金融機構提交的可疑交易報告繼續佔全年總數逾98.5%,主要來自銀行業(佔88.97%),而儲值支付工具營運商繼續為第二大報告來源(佔5%)。值得一提的是,年內虛擬資產交易平台營運者的提交數目按年飆升逾19倍,由5份急增至95份,增幅信是由於證券及期貨事務監察委員會(「虛擬資產」、「加密貨幣」等關鍵字在該組情報出現的次數亦日增。

### Receipt of STRs

In 2024, JFIU received a total of 147,660 STRs, marking a 51.3% year-on-year upsurge (+50,083 STRs). Fls continued to account for over 98.5% of the annual STR submissions, with the banking sector being the dominant contributor (88.97% of total STR submissions), whilst SVF operators remained the second-largest sector, representing 5% of total STR submissions. Notably, submissions from VATP operators soared over 19 times year-on-year in 2024, rising from 5 to 95 STRs, believably due to the new licensing regime implemented by the Securities and Futures Commission ("SFC"). Keywords such as "virtual asset", "crypto" and "cryptocurrencies" have been increasingly observed in JFIU's intelligence.

### 2020年至2024年接獲可疑交易報告摘要 Summary of STRs received between 2020 and 2024

Summary of 31	IX3 ICCCIV	ca betwee	ii Zozo aii	IU 2024	
行業 Sector	2020	2021	2022	2023	2024
金融機構 Financial Institutions (FIs)					
銀行(包括數字銀行)	48,525	45,893	55,508	84,781	131,379
Banks (Including Digital Banks)	(84.94%)	(80.64%)	(80.99%)	(86.89%)	(88.97%)
保險公司	1,179	1,207	921	1,327	1,919
Insurance Companies	(2.06%)	(2.12%)	(1.34%)	(1.36%)	(1.30%)
放債人	17	54	451	492	320
Money Lenders	(0.03%)	(0.09%)	(0.66%)	(0.5%)	(0.22%)
證券公司	694	678	622	553	795
Securities Firms	(1.21%)	(1.19%)	(0.91%)	(0.57%)	(0.54%)
虛擬資產交易平台營運者* Virtual Asset Trading Platform Operators*	1	16 (0.03%)	0	5 (0.01%)	95 (0.06%)
儲值支付工具營運商	2,512	5,032	6,904	6,501	7,446
Stored Value Facility Operators	(4.40%)	(8.84%)	(10.07%)	(6.66%)	(5.04%)
金錢服務經營者	2,033	2,351	2,623	2,407	3,603
Money Service Operators	(3.56%)	(4.13%)	(3.83%)	(2.47%)	(2.44%)
金融機構提交報告總數 (佔接獲報告總數比率) Total No. of STRs Filed by FIs (% of all STRs Received)	54,960 (96.20%)	55,231 (97.04%)	67,029 (97.80%)	96,066 (98.46%)	145,557 (98.58%)
指定非金融業人士 Designated Non-Financial Businesses a	nd Professions	s ("DNFBPs")			
地產代理	93	92	113	79	142
Estate Agencies	(0.16%)	(0.16%)	(0.16%)	(0.08%)	(0.10%)
貴金屬及寶石交易商	25	10	6	14	12
Dealers in Precious Metals & Stones	(0.04%)	(0.02%)	(0.01%)	(0.01%)	(0.01%)
法律專業人士	807	597	681	677	1,128
Legal Professionals	(1.41%)	(1.05%)	(0.99%)	(0.69%)	(0.76%)
會計專業人士	16	9	13	10	11
Accounting Professionals	(0.03%)	(0.02%)	(0.02%)	(0.01%)	(0.01%)
信託及公司服務提供者 Trust and Company Service Providers	104	162	190	161	234
	(0.18%)	(0.28%)	(0.28%)	(0.16%)	(0.16%)
指定非金融業人士提交報告總數 (佔接獲報告總數比率) Total No. of STRs Filed by DNFBPs (% of all STRs Received)	1,045 (1.83%)	870 (1.53%)	1,003 (1.46%)	941 (0.95%)	1,527 (1.03%)
其他行業提交報告數目 (佔接獲報告總數比率) No. of STRs Filed by Others (% of all STRs Received)	1,125 (1.97%)	812 (1.43%)	506 (0.74%)	570 (0.59%)	576 (0.39%)
接獲報告總數 Total No. of STRs Received	57,130	56,913	68,538	97,577	147,660

<sup>\*</sup> 指根據《證券及期貨條例》(第571章)獲發牌的虛擬資產交易平台營運者

Denotes those licensed under the Securities and Futures Ordinance (Cap. 571)

### 分析可疑交易報告

各界的可疑交易報告為該組的主要情報來源,供策略和行動分析之用。該組評估告時,會採用風險為本的做法,並參及恐怖分子資金籌集情及恐怖分子資金籌集風險水平、情報價值分析與 發及恐怖分類後 案類型;另亦會將其按潛在洗黑價值 分子資金籌集風險水平、情報價值分析與 跟進行動的可行性分類後,全面分析財 先處理的報告,以拓展整套具質素的財富 情報。

### 發布可疑交易報告

### **Analysis of STRs**

STRs received from various sectors are the major source of information for strategic and operational analysis by JFIU. A risk-based approach is adopted for STR assessment, with due reference to the latest ML/TF landscape and typologies. Following the triage of STRs in accordance with the level of inherent ML/TF risks, value of intelligence and actionable potential, a holistic analysis is conducted on prioritised STRs to develop quality financial intelligence packages.

### **Dissemination of STRs**

JFIU disseminates useful intelligence to LEAs and/or FIUs worldwide to enable the extraction of actionable leads for their subsequent investigation. Out of the 147,660 STRs received in 2024, 45,376 were disseminated with HKPF (42,728 STRs, 94.2%) and C&ED (1,068 STRs, 2.4%) as the major recipients for downstream investigation. Alongside the dissemination of STRs, JFIU also proactively developed intelligence and converted the same into actionable financial intelligence packages in line with ML/TF risks in Hong Kong. Several fruitful arrests were made, including the neutralisation of multiple cross-boundary ML syndicates active in Hong Kong and its neighbouring jurisdictions.

	2020	2021	2022	2023	2024
發布可疑交易報告總數 Total No. of STRs Disseminated	19,077	21,142	33,218	39,127	45,376
可疑交易報告發布率 Dissemination Rate of STRs	33.4%	37.1%	48.5%	40.1%	30.7%

### 查閱可疑交易報告資料

可疑交易報告管理系統於2006年面世, 為網上平台,備存了該組大量的可疑安 報告資料。為配合法定要求和資訊保安措 施,該組歡迎本地各執法機關提交關 請,要求查核系統記錄,以及可疑戶 (可涵蓋疑犯、可疑公司及更戶(包於 易或資金流向)。本地獲授權用直接 香港警務處及香港海關 統查核記錄,以便適時進行調查/ 情報拓 展。

2020年至2024年期間,每年要求查核系統記錄的次數介乎2,500次至5,000次左右,而系統直接查核次數則由214,730次增至334,661次,反映各界對可疑交易報告資料的需求日增,視之為有助執法的資料,以打擊洗黑錢、恐怖分子資金籌集及相關上游罪行。

### **Access to STR Information**

JFIU maintains a wealth of STR information on its web-based system named STREAMS, which was first launched in 2006. In line with the statutory confines and information security safeguards, JFIU welcomes local LEAs to make formal requests for STREAMS record checks for information (possibly covering suspects, suspicious companies and suspicious accounts, transactions or fund flows). Local authorised users (including officers from HKPF and C&ED) are entitled to conduct direct searches on STREAMS to facilitate investigation/intelligence cultivation in a timely manner.

Between 2020 and 2024, the annual number of requests for STREAMS record checks made to JFIU ranged around 2,500 to 5,000, whilst direct searches made on STREAMS increased from 214,730 to 334,661 over the years, reflecting the escalating demand for STR information, which is considered conducive to enforcement actions against ML, TF and associated predicates.

	2020	2021	2022	2023	2024
可疑交易報告管理系統查核記錄總次數 Total No. of STREAMS Record Checks	4,876	4,103	5,095	4,967	2,508
可疑交易報告管理系統直接查核總次數 Total No. of STREAMS Direct Searches	214,730	234,627	240,443	267,804	334,661

The majority of STRs were submitted electronically, which facilitated the deployment of analytics tools by JFIU. To harness the latest technology in combating financial crime and strengthen its capability in financial intelligence analysis, JFIU secured funding from the Legislative Council in July 2021 to develop FDAP. Leveraging advanced technologies, such as data mining, machine learning and AI, FDAP is poised to build a robust ecosystem capable of efficiently and accurately collecting, processing and analysing vast amounts of data from various sources for conversion into useful and actionable financial intelligence, thereby substantially supporting JFIU in its investigation, intelligence analysis and information dissemination. With its development in good progress, JFIU is striving to secure the timely implementation of FDAP by phase.

	2020	2021	2022	2023	2024
電子處理可疑交易報告比率	88.40%	84.55%	83.47%	87.58%	90.17%
(涉及可疑交易報告總數)	(50,501)	(48, 122)	(57,210)	(85,461)	(133,146)
% of STRs with Electronic Processing	,	,	,	,	,
(Total No. of STRs Involved)					
人手處理可疑交易報告比率	11.60%	15.45%	16.53%	12.42%	9.83%
(涉及可疑交易報告總數)	(6,629)	(8,791)	(11,328)	(12,116)	(14,514)
% of STRs with Manual Processing					
(Total No. of STRs Involved)					

### 可疑交易報告質素建議

### 與本地持份者合作

為加強打擊金融罪行,該組於2023年6月 與金管局及香港銀行公會推出財富情報 交換平台,讓執法機關與銀行之間協調更 佳,及早識別錢騾帳戶,以打擊相關罪 行。此舉不僅加強情報分享及業界合作, 同時亦使更嚴格盡職審查措施能更精準鎖 定高風險客戶。2024年,參與平台的銀行 已增至10家。

### **Feedback on STR Quality**

The overall quality of STR input from various reporting sectors is paramount to the effectiveness of the suspicious transaction reporting regime. Thus, JFIU provides qualitative and quantitative feedback on STRs to regulators, professional bodies and reporting entities as appropriate. JFIU publishes STR Quarterly Analysis in 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 of quality STRs, STR statistics on filing trends, case examples of the latest ML/TF-related typologies, as well as other good practices observed in their daily AML/CFT compliance and controls.

With the rapid advancement of FinTech in Hong Kong, the use of digital technologies by the Government, businesses and individuals continues to surge. Despite the convenience brought to daily financial services by technological advancements, such as remote onboarding, e-banking services, FPS transactions and smart payment functions through SVFs, these technologies have created opportunities for criminals to launder illicit proceeds by manipulating multiple stooge accounts. Reporting entities are thus encouraged to adopt a risk-based approach, employ technological solutions to mitigate the risks and exercise vigilance during transaction monitoring with an effective know-your-customer process in identifying suspicious activities and syndicates. JFIU will maintain close collaboration with all stakeholders to address the emerging challenges.

### **Co-operation with Local Stakeholders**

JFIU treasures and seeks to enhance inter-agency collaboration in the AML/CFT community. At the strategic level, JFIU works with government bureaux, regulators and professional bodies to provide input on policies, legislation and/or guidelines that touch on the suspicious transaction reporting regime. Following the implementation of the new licensing regime by SFC in June 2023, VATP stakeholders have been proactively engaged to enhance collaboration. JFIU will continue to assist in collating STRs or other AML/CFT-related statistics for deliberations in high-level governmental meetings. At the operational level, JFIU will continue to provide intelligence, investigative and asset recovery support through timely financial intelligence exchanges with LEAs and FIUs.

To step up the fight against financial crime, JFIU in partnership with HKMA and the Hong Kong Association of Banks launched FINEST in June 2023. FINEST, as a financial intelligence sharing platform, enables better co-ordination among LEAs and banks for the early identification of money mule accounts to combat financial crime, while also enhancing intelligence sharing, industry-wide co-operation, as well as the accurate employment of enhanced due diligence measures against high-risk customers. In 2024, the total number of participating banks in FINEST expanded to 10.

## 與可疑交易舉報機構定 期聯繫

# 國際合作及參與 埃格蒙特金融情報組織 (「埃格蒙特組織」)

埃格蒙特組織於1995年4月成立,為國際組織,現有177名成員,負責加強全球推行反洗黑錢及恐怖分子資金籌集措施的財富情報單位之間的合作,以交換情報、提供培訓和分享專業知識。香港自1996年起加入,展現其阻截和打擊跨國洗黑錢及恐怖分子資金籌集的決心。聯合財富情報是公縣一直與全球財富情報單位緊密的大協助跨司法管轄區執法和交換情報,並按需要向海外執法機關提供支援。

# **Regular Liaison with STR Reporting Entities**

JFIU recognises the private sector 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 crime proceeds or finance terrorism. To strengthen the coordination and communication between JFIU and the private sector, designated liaison officers are assigned to follow up on enquiries from major STR reporting entities. From time to time, alerts are published on the noticeboard at the Secure Area of STREAMS to keep FIs and DNFBPs apprised of the latest crime trends and ML/TF landscape.

# International Co-operation and Representation The Egmont Group of Financial Intelligence Units ("Egmont Group")

The Egmont Group is an international organisation with 177 members established in April 1995 to improve co-operation on information exchange, training and expertise between FIUs worldwide engaging in AML/CFT measures. Having joined the Egmont Group in 1996, Hong Kong has exemplified its determination in deterring and combating transnational ML/TF. As a member of the Egmont Group, JFIU not only works with FIUs worldwide to support cross-jurisdiction law enforcement and intelligence exchange, but also provides assistance to overseas LEAs whenever appropriate.

Research on ML/TF trends and typologies provides the AML community with a robust foundation for understanding the evolving tactics employed by criminals and developing effective strategies against such criminal activities. Recognising its importance, JFIU actively engages in international studies focused on prevalent and emerging crime trends, including co-leading as an Egmont Group member, a joint research project with the Singapore Police Force (FATF's representative) and INTERPOL to counter illicit financial flows arising from cyber-enabled fraud. In February 2024, a Senior Inspector of Police, FIIB was selected as a panel speaker at the cyber-enabled fraud workshop held during the 2024 Egmont Group Working and Regional Group Meetings in Malta to share insights on countering cyber-enabled fraud.



■財富情報及調查科人員於2024年2月到馬爾他出席2024 年埃格蒙特組織工作及地區小組會議。

FIIB officers attend the 2024 Egmont Group Working and Regional Group Meetings in Malta in February 2024.



財富情報及調查科高級督察於2024年6月到法園巴黎出席第三十屆埃格蒙特組織全體會議,並在會上就一宗跨境洗黑錢案件作簡報。 Senior Inspector of Police, FIIB presents a cross-border ML case at the 30<sup>th</sup> annual Egmont Group Plenary in Paris, France in June 2024.

### 環球財富情報交流

財富情報單位獨具優勢,能夠支援本地及 國際打擊洗黑錢及恐怖分子資金籌集活 動。聯合財富情報組向來珍視與全球財富 情報單位交換的情報。

2024年,該組與各地就財富情報交換共有 1,960次函件往來,較2023年的2,036次, 微跌3.7%。

# **Worldwide Financial Intelligence Exchange**

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

In 2024, JFIU recorded 1,960 correspondences on financial intelligence exchange, representing a slight decrease of 3.7% from 2,036 in 2023.

### 該組與全球財富情報單位交換財富情報的統計數字

Statistics on Financial Intelligence Exchange between JFIU and FIUs Worldwide

年份Year		2020	2021	2022	2023	2024
`	矣格蒙特組織)	924	1,007	1,109	1,141	923
	Egmont Group)					
•	非埃格蒙特組織*)	177	134	100	84	118
•	Non-Egmont Group*)					
收函總數	ng Correspondences	1,101	1,141	1,209	1,225	1,041
Total No. of Incomi	ing Correspondences					
	矣格蒙特組織)	933	707	583	590	657
,	Egmont Group)					
,	非埃格蒙特組織*)	330	319	265	221	262
(N	Non-Egmont Group*)					
發函總數		1,263	1,026	848	811	919
	ng Correspondences					
總數Total		2,364	2,167	2,057	2,036	1,960

<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,偶有其他海外執法機關
Non-Egmont Group members primarily include non-Egmont FIUs and occasionally other overseas LEAs

2024年,該組與全球95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 2024, JFIU exchanged financial intelligence with 95 Egmont Group members and 5 non-Egmont Group members across continents. The number of FIUs engaged from each continent is as follows:

# 2024年與該組交換財富情報的 埃格蒙特組織單位數目(按地區劃分\*)

Number of Egmont FIUs Exchanged Financial Intelligence with JFIU in 2024 (By Region\*)

地區 Region	財富情報單位數目 No. of FIUs
美洲 Americas	14
歐洲(一)Europe I	23
歐洲(二)Europe II	15
歐亞 Eurasia	6
亞洲及太平洋 Asia & Pacific	18
東非及南非 East & Southern Africa	6
西非及中非 West & Central Africa	4
中東及北非 Middle East & North Africa	9
總數 Total	95

<sup>\*</sup>參考埃格蒙特組織的地區分類

with reference to the regional grouping adopted by the Egmont Group

如下表所示,該組於 2024 年較常與亞洲及太平洋地區成員交換情報,以923次的收函總數計,該地區佔261次,較2023年的為多,增幅主要由於與洗黑錢相關的情報所致。

As tabulated below, JFIU frequently exchanged intelligence with members from the Asia & Pacific region in 2024, contributing to 261 out of 923 incoming correspondences, with a year-on-year increase mainly attributed to ML-related intelligence.

# 2023年及2024年從埃格蒙特組織成員接獲交換財富情報函件的次數(按地區劃分\*)

Numbers of Incoming Correspondences on Financial Intelligence Exchange from Egmont Group Members in 2023 and 2024 (By Region\*)

地區 Region	收函次數 No. of Incoming Correspondences		
	2023	2024	
美洲 Americas	536	219	
歐洲(一)Europe I	204	215	
歐洲(二)Europe II	65	77	
歐亞 Eurasia	29	20	
亞洲及太平洋 Asia & Pacific	193	261	
東非及南非 East & Southern Africa	11	12	
西非及中非 West & Central Africa	5	8	
中東及北非 Middle East & North Africa	98	111	
總數 Total	1,141	923	

<sup>\*</sup>參考埃格蒙特組織的地區分類

with reference to the regional grouping adopted by the Egmont Group

# 2024年與各財富情報單位交換情報的趨勢

整體而言,全球財富情報單位發出的交換情報要求內容簡潔,結構完整,並會自發分享情報,可見其策略審慎。不論是接獲或發出的交換情報要求,詐騙及洗黑錢仍為最常見的罪行,而與對口單位交換的情報亦顯然日見複雜。

# Trend of Information Exchange with FIUs in 2024

Overall, FIUs worldwide adopted a prudent strategy, characterised by concise, well-structured requests and spontaneous sharing of information. While fraud and ML continued to be the most prevalent crimes for both incoming and outgoing requests, the complexity of the intelligence exchanged with our counterparts noticeably increased.

	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	洗黑錢 Money Laundering (234)	可疑交易 Suspicious Transactions (120)	詐騙 Fraud (89)	税務罪行 Tax Crime (13)	貪污 Corruption (9)
接獲自發分享情報的性質 Nature of Incoming Spontaneous Sharing	詐騙 Fraud (189)	可疑交易 Suspicious Transactions (110)	洗黑錢 Money Laundering		文件 ery(2)
			(62)	Insider	<sup>/</sup> 市場操縱 Trading / nipulation(2)

	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>
發出要求索取情報的性質 Nature of Outgoing Requests	貪污 Corruption(19)		詐騙 Fraud (3)	不適用 N/A	不適用 N/A
	洗黑錢 Money Laundering(19)				
自發分享情報的性質 Nature of Outgoing Spontaneous Sharing	洗黑錢 Money Laundering (30)	內幕交易/ 市場操縱 Insider Trading / Market Manipulation (12)	詐騙 Fraud (5)	税務罪行 Tax Crime (4)	貪污 Corruption (3)

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

### 案例─情報致使資產成功追回

#### Case Example — Intelligence led Successful Asset Recovery

A君及其聯繫者被指涉及1宗懷疑投資騙案,推銷兩隻加密貨幣,常稱該貨幣極具投資潛力,誘使投資者購入;惟該兩隻貨幣其後受到所謂的網絡攻擊,市值暴跌至幾乎一文不值,令全球投資者損失慘重。A君及其聯繫者事後失聯;調查顯示其資金根本不足以保證相關的投資回報,有關操作懷疑為龐氏騙局,騙款總額高達6,700萬美元。

司法管轄區X要求國際刑警組織將A君列入 紅色通緝令名單。情報顯示A君及其聯繫 者曾在香港某數碼資產信託公司開立3個戶口,持有總結餘為市值2,000萬美元的加密 貨幣。司法管轄區X遂提出相互法律協助請求,要求香港限制有關貨幣。此案的法律 程序仍在進行。 A suspected investment fraud case was reported in which Individual A and his associates marketed 2 cryptocurrencies and frequently claimed that the cryptocurrencies had significant investment potential and lured investors into purchasing the cryptocurrencies. However, due to a purported cyber-attack, the cryptocurrencies collapsed and lost almost all of their value, causing heavy losses to global investors. After the collapse, Individual A and his associates went out of reach. Investigation suggested that they had insufficient funds to meet the guaranteed return and the operation was suspected to be a Ponzi scheme. The total amount defrauded was around USD 67 million.

Jurisdiction X then asked INTERPOL to name Individual A on the Red Notice. Subsequently, intelligence unveiled that Individual A and his associates have maintained 3 accounts with a digital asset custodian in Hong Kong, holding an aggregate balance of USD 20 million worth of cryptocurrencies. Subsequently, a request for mutual legal assistance was received from Jurisdiction X to restrain those cryptocurrencies. Court proceedings are still ongoing.

### 財務數據分析平台

為進一步支援洗黑錢調查,提升分析可疑交易報告的能力,財富情報及調查科正開發財務數據分析平台,涉資高達6.98億港元;該平台由四大系統組成,分別為財富情報交換平台、交易數據分析系統(TAS)、第二代可疑交易報告管理系統及為以先進技術及大數據加強財富情報系統的分析能力而設的專用系統。

# Financial Data Analytics Platform ("FDAP")

To further support investigation of ML cases and to enhance the capability of STR analysis, FIIB has undertaken the development of FDAP worth HKD 698 million. FDAP consists of 4 components: FINEST, Transaction Analytics System ("TAS"), STREAMS 2 and Bespoke System, designed specifically to strengthen the analytical capabilities of financial intelligence systems through advanced technology and big data.

### 財富情報交換平台

### 交易數據分析系統

交易數據分析系統旨在提供強大分析工具,讓刑偵人員更自動化、更高效地分析多個戶口的資金流向及關聯網絡,大規模配對從各渠道所得的數據,務求更快捷有效地揭露非法資金流向和隱藏網絡;此系統現已全面推行,冀借助先進科技在財富調查和情報拓展方面提速提效。

# 第二代可疑交易報告管 理系統

### 專用系統

人工智能財富調查分析工具料設人工智能 及機械學習功能,以期透過先進技術,顯 著提升整體調查效率及成效。

# Financial Intelligence Evaluation Sharing Tool ("FINEST")

Early identification of potential stooge accounts is crucial in preventing their proliferation. Achieving this relies heavily on the joint preventive efforts among the banking sector. Since the launch of FINEST in June 2023, participating banks have been sharing information on corporate accounts, fostering a more proactive and effective detection and disruption of fraud and mule networks. In August 2024, 5 more banks joined FINEST, bringing the total membership to 10. This facilitates joint investigative efforts to strengthen the fight against financial crime. To align with international standards and improve the effectiveness of AML measures, a review on the Banking Ordinance (Cap. 155) commenced in January 2024, aiming to extend the scope of information sharing by banks to include personal data on customers, accounts and transactions for the prevention and detection of financial crimes. The enhancement of FINEST is expected to be completed in Q4 2025.

### **Transaction Analytics System ("TAS")**

TAS serves to provide a powerful analytics tool for crime officers to conduct highly automated and efficient analysis of fund flow and network across multiple accounts by extensive mapping of data from various sources, which helps uncover illicit fund flows and hidden networks more efficiently and effectively. With the full implementation of TAS, the efficiency and effectiveness of financial investigation and intelligence cultivation have been significantly boosted through advanced technology.

# **Suspicious Transaction Report and Management System 2 ("STREAMS2")**

Incepted in 2006, STREAMS is unequipped with advanced data mining or analytics tools. To cope with the surge in the number of STRs received over the past years, a new system, i.e. STREAMS 2, will set up integrated interfaces with banks and other STR reporting entities to provide an effective and secure suspicious transaction reporting channel by streamlining the submission process. STREAMS 2 will also integrate multiple external and internal data sources and enable crosschecking of account details, subjects and digital footprints reported in STRs. The automated functions will enhance operational efficiency by streamlining check requests, STR dissemination and user access management.

### **Bespoke System**

The Al-powered analytics tools tailored for financial investigation are expected to include Al and machine learning functions. By leveraging advanced technology, the overall investigation efficiency and effectiveness will be significantly improved.

# Strengthened Enforcement Efforts, Case Studies and Typologies 加強執法要點與個案研究及類型

### 加強執法行動 精簡法律 意見程序

為打擊日益猖獗的跨境洗黑錢活動,財富情報及調查科積極與本地及外界持份者加強執法, 主動進行調查、檢控及後續的資產追討,務求打擊洗黑錢集團及跨司法管轄區的洗黑錢活動;另亦與內地及海外執法機關展開多個聯合行動。

鑑於案件數量日增,故本科持續檢討並簡化調查流程,從而善用資源;另亦與金管局及金融機構合作,加快提供調查單位所需資料及證據的速度。有見利用傀儡戶口的洗黑錢案件日多,本科已與律政司精節徵詢法律意見的程序,適用於涉及傀儡戶口且案情簡單的洗黑錢案件,使年內相關檢控數字飆升逾200%。

## 個案研究及類型

2024年,洗黑錢手法可謂層出不窮,包括傳統及嶄新科技方式,當中涉及新興和常見洗黑錢手法的個案研究及類型如下:

# **Enhanced Enforcement Actions and Streamlined Legal Advice Protocol**

To combat the increasingly prevalent and cross-border nature of ML activities, FIIB proactively steps up enforcement actions with local and external stakeholders. In 2024, we conducted active investigation, prosecution and subsequent asset recovery against ML syndicates and cross-jurisdictional ML activities, and alongside joint operations with Mainland and overseas LEAs.

Given the mounting caseload, FIIB continually reviews and streamlines its investigation workflow, with the goal of utilising resources in the most efficient manner. We have collaborated with HKMA and FIs to expedite the provision of information and evidence essential to investigation units. In response to the growing prevalence of stooge accounts in ML cases, FIIB and DoJ have streamlined the procedure for seeking legal advice in straightforward ML cases involving stooge accounts, resulting in over a 200% increase in the number of ML prosecutions in 2024.

### **Case Studies and Typologies**

A diverse range of ML techniques, covering both traditional and new technology methods, were observed in 2024, with case studies and typologies reflecting the evolving and prevalent ML methods highlighted below:



#### 個案研究1至3

### 透過加密貨幣、場外交易或人工智能技術進行洗黑錢活動

Case Studies 1-3

Exploitation of Cryptocurrency, OTC Trading or Al Technologies in ML Activities Technologies in ML Activities

### 個案研究1 Case Study 1

#### - Reari

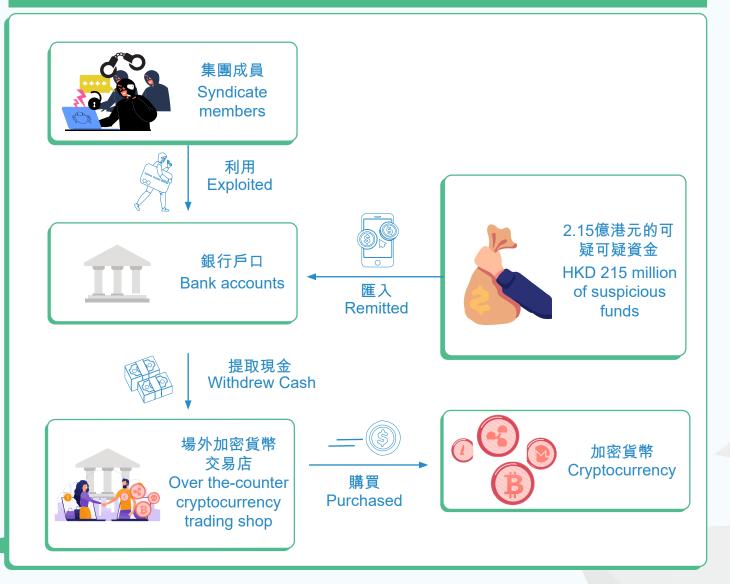
▶紅旗警號:#場外交易 #加密貨幣

Red Flag: #OTC Trading #Cryptocurrency

#### 利用加密貨幣清洗犯罪得益

#### **Laundering of Crime Proceeds via Cryptocurrency**

Intelligence indicated that substantial cash withdrawals were made from a number of suspicious bank accounts in Hong Kong upon receiving crime proceeds from local deception cases. Subsequent investigation revealed that a local ML syndicate exploited numerous local bank accounts to dissipate the crime proceeds. Once the proceeds were remitted into the bank accounts, the syndicate members immediately withdrew the funds in cash and used the money to purchase cryptocurrency via an OTC cryptocurrency trading shop in an attempt to obscure the origin of the funds. The syndicate was found to have laundered over HKD 215 million of suspicious funds. A total of 12 local syndicate members were arrested by FIIB. The investigation is still ongoing.



### 個案研究2 Case Study 2

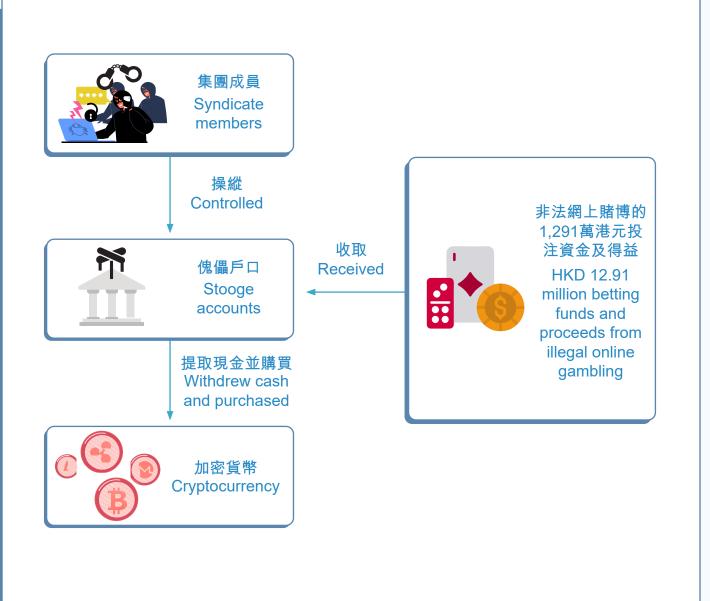
紅旗警號:#非法賭注 #加密貨幣 Red Flag: #Illegal Bets #Cryptocurrency

#### 清洗非法賭注

2024年,情報顯示7個本地傀儡戶口於同年5月至7月有大筆現金提取記錄,總額達1,291萬港元。其後,該筆資金被用於購買加密貨幣。情報進一步顯示,不法集團涉嫌經該等戶口收取非法網上賭博的投注資金及得益。財富情報及調查科遂於2024年8月至9月拘捕11名集團成員及傀儡戶口持有人,而相關調查仍在進行。

#### Laundering of Illegal Bets

In 2024, intelligence indicated that substantial cash withdrawals totalling HKD 12.91 million were made from 7 local stooge accounts between May and July 2024. The funds were later dissipated through the purchase of cryptocurrency. Intelligence further revealed that these accounts were allegedly used to receive betting funds and proceeds from illegal online gambling. Between August and September 2024, a total of 11 syndicate members and stooge account holders were arrested by FIIB. The investigation is still ongoing.



### 個案研究3 Case Study 3

🥌 紅旗警號:#人工智能 #深偽 #換臉 #科技

Red Flag: #AI #Deepfake #Face-swapping #Technologies

### 不當使用人工智能技術

某金融機構的情報顯示,不法分子會利用先進的人工智能深偽和換臉等技術,繞過遙距開戶程序的人臉識別系統。是項發現源於該機構分析與可疑IP地址有關的多次登入失敗情況;後續調查揭示,騙徒會以人工智能工具假冒戶口持有人。

#### Misuse of Al Technologies

An FI's intelligence uncovered the use of advanced AI technologies, such as deepfake and face-swapping technologies, to bypass facial recognition systems during the remote onboarding process. This was triggered by the FI's analysis of repeated unsuccessful login attempts, which were linked to suspicious IP addresses. Further investigation revealed that fraudsters impersonated account holders by exploiting AI-powered tools.



集團成員 Syndicate members 利用深偽技術企圖登 入網上銀行 Use of Deepfake for on-boarding process



Unsuccessful login

銀行審視登入失 敗個案 Banks review failed login cases





詐騙者試圖利用可疑IP地址及 人工智慧工具冒充帳戶持有人 Investigation revealed that fraudsters attempted to use Al-powered tools to impersonate account holders with known suspicious IP address

### 個案研究4至5 從數碼足跡及公用IP地址所得的情報

Case Studies 4-5

Intelligence from Digital Footprints and Common IP Addresses

### 個案研究4 Case Study 4

#### ▲ 紅旗警號:#數碼足跡 #公用IP地址

Red Flag: #Digital Footprints #Common IP addresses

#### 留有公用數碼足跡的洗黑錢集

2024年,情報顯示多個銀行戶口有可疑活動,並經公用IP地址登入,而該地址的用戶為新界元朗某工業大廈共享辦公室的公共Wi-Fi。後續調查揭示,該辦公室由某洗黑錢集團操控,用以啟動網上銀行戶口,並試驗付款。涉案戶口收取的犯罪得益為逾 30宗於2024年3 月至6月接獲的本地詐騙案所得,經清洗的可疑資金總額達逾1,200萬港元。財富情報及調查科遂拘捕8名本地集團成員,而相關調查仍在進行。

#### **ML Syndicate with Common Digital Footprints**

In 2024, intelligence indicated that numerous bank accounts with suspicious activities were accessed by common IP addresses which were subscribed to public Wi-Fi at a shared office in an industrial building in Yuen Long, New Territories. Further investigation suggested that an ML syndicate was in control of the office for online banking account activation and test payments. The accounts received crime proceeds from over 30 local deception cases reported between March and June 2024. The syndicate was found to have laundered over HKD 12 million of suspicious funds. A total of 8 local syndicate members were arrested by FIIB. The investigation is still ongoing.



### 集團成員

Syndicate members



#### 經公用IP地址啟動網上 銀行服務並試驗付款

Activated online banking services and made test payments with common IP addresses





匯入 Remitted



逾 30 宗本地詐騙案的1,200萬港元可疑資金

HKD 12 million suspicious funds from over 30 local deception cases

### 個案研究5 Case Study 5

#### 跨境洗黑錢集團



紅旗警號:#跨境#數碼足跡#公用IP地址

Red Flag: #Cross-border #Digital Footprints #Common IP address

#### **Cross-border ML Syndicate**

In 2024, an intelligence exchange with Jurisdiction A unearthed a cross-border ML syndicate that had been recruiting citizens of Jurisdiction B to open bank accounts in Hong Kong to launder crime proceeds from deception cases in Jurisdiction A and Hong Kong. Digital footprints revealed that some of the stooge accounts were accessed via the same IP address subscribed at the residence of a ringleader in Hong Kong, who recruited the stooges and arranged their accommodation in Hong Kong. Financial investigation surfaced that the syndicate had opened a total of 13 local bank accounts since October 2023 and laundered HKD 102 million of suspected crime proceeds from 54 deception cases till August 2024. FIIB subsequently mounted an operation, resulting in the arrest of 7 syndicate members, including the ringleader. The investigation is still ongoing.



情報交換 Intelligence exchange



司法管轄區A與 香港的1.02億港 元詐騙案犯罪 得益

HKD 102 million crime proceeds from deception cases in Jurisdiction A and Hong Kong



匯入 Remitted



香港 Hong Kong



首腦 Ringleader



13個本地銀行戶口經相同的IP地址登入
13 local bank accounts accessed via the same IP address

#### 招攬 Recruited



傀儡戶口持有人 Stooge account holders

開立 Opened

### 個案研究6至7 利用儲值支付工具或現金進行洗黑錢活動 Case Studies 6-7 Exploitation of SVFs or Cash in ML Activities

個案研究6 Case Study 6

紅旗警號:#儲值支付工具#性行業 Red Flag: #SVFs #Sex Industry

#### 利用儲值支付工具清洗非法資金

自2024年6月起,警方進行一項行動, 以打擊於Telegram經營宣傳賣淫平台 的集團。涉案平台會員需支付388港元 至3,888港元的訂閱費,以獲權存取性 可疑資金。執法機關遂於2024年9月展 members. 開行動,拘捕7名集團成員。

#### **Exploitation of SVFs for Laundering Illicit Funds**

Since June 2024, an operation had been mounted against a vice syndicate managing a prostitution advertising platform on Telegram. Members were charged subscription fees ranging from HKD 388 to HKD 3,888, granting them access to advertisements for sex workers. 工作者廣告。調查顯示,上述賣淫集 Investigation revealed that the syndicate laundered about HKD 13 團看準儲值支付工具的匿名和易用性 million by collecting subscription fees via SVFs, which offered anonymity 質,先經該等工具收取訂閱費,待到 and ease of use, with the immediate transfer of suspicious funds to 帳後再迅即轉入傳統銀行戶口,企圖 traditional bank accounts for obscuring their origins. In September 隱藏其來源,以清洗約1,300萬港元的 2024, the operation turned overt, resulting in the arrest of 7 syndicate



集團成員 **Syndicate** members

操縱 Controlled



透過儲值支付工具收取 Received via SVFs

轉移到傳統銀行帳戶 Transferred to traditional bank accounts



銀行戶口 Bank accounts



會員費及管理賣淫廣告平台 的1,300萬港元收益

HKD 13 million proceeds from membership and administrative fee of a prostitution advertising platform

### 個案研究7 Case Study 7

### ► 紅旗警號:#現金 #性行業 Red Flag: #Cash #Sex Industry

### 利用現金進行洗黑錢活動

情報顯示,某不法集團會提供住宿和交通,以操控多名性工作者,安排其於指定娛樂場所提供性服務後,以現金收款,方便後續清洗有關犯罪得益。2024年4月,警方展開行動,共拘捕21名集團成員,檢獲13.49萬港元的現金及若干外幣。

### Case Study 7: Exploitation of Cash in ML Activities

Intelligence revealed that a syndicate exerted control over sex workers by providing accommodation and transportation. In return, the sex workers were arranged to provide sexual services in designated entertainment venues and then collect payments in cash, facilitating the laundering of relevant crime proceeds. In April 2024, an operation turned overt, resulting in the arrest of 21 syndicate members, as well as the seizure of HKD 134,900 in cash and foreign currencies.



### 個案研究8至10 涉及錢騾、貿易或詐騙的跨境洗黑錢案件

Case Studies 8-10

Cross-border ML Cases in Relation to Money Mules, Trade or Fraud

### 個案研究8 Case Study 8

### 招攬外籍人士作錢騾

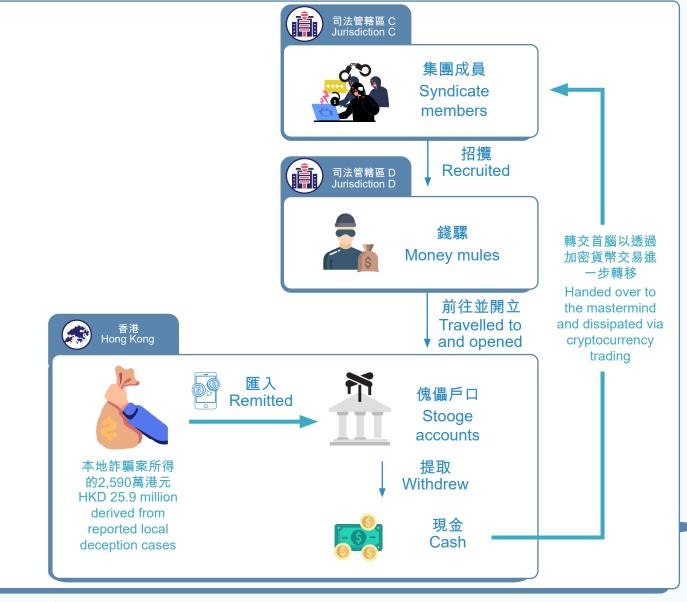
2024年,情報顯示某海外洗黑錢集團於司法管轄區C利用76個本地個人銀行戶口,清洗5.86億港元的可疑犯罪得益,其中2,590萬港元為本地詐騙案所得。隨後調查揭示,該集團於司護區D招攬傀儡,並安排他們來現作錢騾,待其從銀行戶口提取大筆現金後,便會將之轉交首腦,以便透過加密貨幣交易進一步轉移有關犯罪得益。財富情報及調查科遂於2024 年3月拘捕 9 名集團成員,而相關調查仍在進行。

### ▶ 紅旗警號:#錢騾 #海外錢騾

Red Flag: #Money Mules #Foreigner Stooges

### Case Study 8: Recruitment of Foreigners as Money Mules

In 2024, intelligence suggested that a foreign ML syndicate in Jurisdiction C had been exploiting 76 local personal bank accounts to launder HKD 586 million of suspected crime proceeds, of which HKD 25.9 million was derived from reported local deception cases. Subsequent investigation revealed that the syndicate recruited stooges in Jurisdiction D and arranged them to travel to Hong Kong as money mules to withdraw large sums of cash from their bank accounts. The cash was then handed over to the mastermind for further dissipation of crime proceeds through crypto-trading. In March 2024, a total of 9 syndicate members were arrested by FIIB. The investigation is still ongoing.



### 個案研究9 <u>Case</u> Study 9

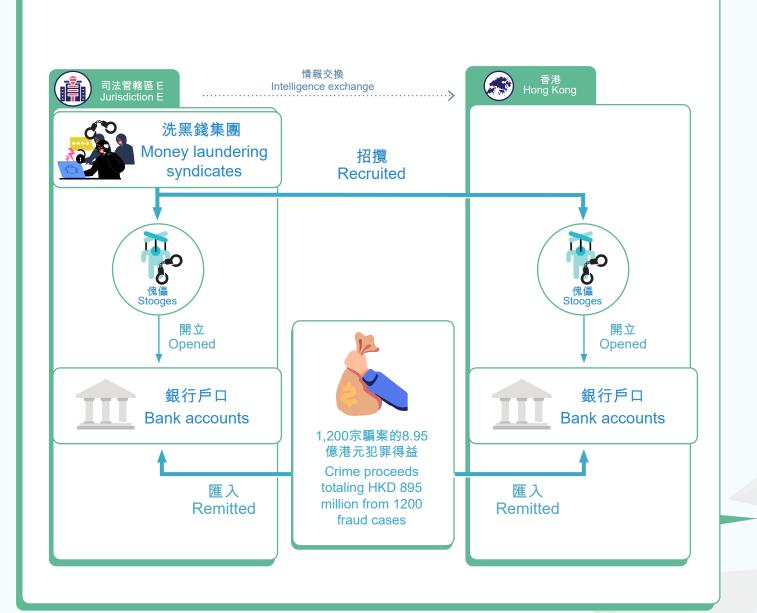
### 涉詐跨境洗黑錢活動

2024年,與司法管轄區E交換的情報顯示,多個洗黑錢集團招攬傀儡於該管轄區和香港開立銀行戶口,以轉移8.95億港元的犯罪得益,而該等得的與1,200宗2023年9月至2024年2月的詐騙案有關。反洗黑錢行動遂於2024年4月起分三階段展開:首兩個階段由司法管轄區E的執法機關展開,共創定187名司法管轄區E的傀儡及13名本地傀儡。2024年4月至6月,財富情報及調查科拘捕 13名本地傀儡,他們涉嫌透過其銀行戶口清洗1.47億港元,其中450萬港元與司法管轄區E的電話騙案有關,而相關適仍在進行。

### ► 紅旗警號:#與詐騙有關 Red Flag: #Fraud-linked

### Case Study 9: Fraud-linked Cross-border ML

In 2024, an intelligence exchange with Jurisdiction E revealed that stooges were recruited by ML syndicates to open bank accounts in Jurisdiction E and Hong Kong for dissipating HKD 895 million in crime proceeds linked to 1,200 fraud cases between September 2023 and February 2024. A three-phase AML operation began in April 2024. During the first two phases, LEAs of Jurisdiction E arrested 32 syndicate members. In mid-May 2024, phase three commenced, identifying a total of 187 stooges in Jurisdiction E and 13 stooges in Hong Kong. Between April and June 2024, 13 local stooges were arrested by FIIB for suspected laundering of HKD 147 million through their bank accounts, of which HKD 4.5 million was related to telephone deception cases reported in Jurisdiction E. The investigation is still ongoing.



### 個案研究10 Case Study 10

### 跨國貿易洗黑錢

紅旗警號:#貿易洗黑錢#跨國

Red Flag: #Trade-based ML #Transnational

### Transnational Trade-based ML

In 2022, C&ED identified a transnational trade-based ML syndicate suspected of receiving substantial funds from overseas entities under the guise of exporting diamonds, precious stones and electronic products to various countries, including Jurisdiction F, through the set-up of several trading companies. An in-depth data analysis uncovered significant discrepancies between the companies' transaction records in Fls, declared trade turnover, business models and their relevant official records, raising suspicions about the exploitation of transnational trade to move illicit funds. Further fund flow analysis, coupled with intelligence exchange, revealed that part of the suspicious funds originated from the proceeds of mobile app scams in Jurisdiction F and were dissipated overseas through a large-scale ML syndicate, with the total laundered funds amounting to HKD 14 billion. In January 2024, C&ED mounted an operation, resulting in the arrest of 8 persons. The investigation is still ongoing.



香港 Hong Kong



貿易洗黑錢集團 Trade-based money laundering syndicate 情報交換 Intelligence exchange

成立 Set up



多間貿易公司

Trading companies exporting diamonds, precious stones, and electronic products

申報貿易收入 Declared as trading profits

假稱出口鑽石、寶 石及電子產品

Purported to export diamonds, precious stones, and electronic products



司法管轄區 F Jurisdiction F



流動應用程式騙 案得益的140億 港元

HKD 14 billion originated from the proceeds of mobile application scams

### 個案研究11 涉及金錢服務經營者及空殼公司的洗黑錢案件 Case Study 11

ML Case in Relation to Money Service Operator and Shell Companies

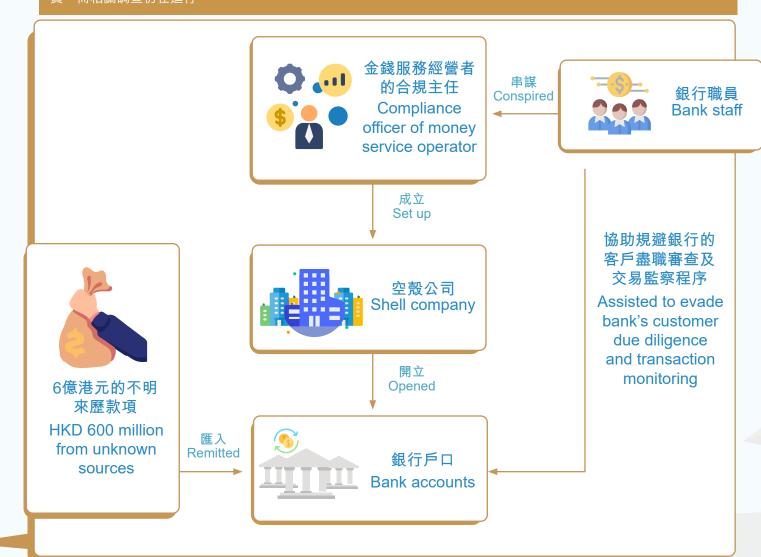
### 個案研究11 Case <u>Study 11</u>

### 涉及金錢服務經營者和串通銀行職員 的洗黑錢活動

► 紅旗警號:#金錢服務經營者 #空殼公司 I Red Flag: #MSO #Shell Companies

### Money Service Operator-related ML in Collusion with Bank Staff Member

In October 2023, C&ED detected a ML case involving a money service operator ("MSO") in which its compliance officer was suspected of laundering about HKD 600 million from unknown sources by setting up a shell company. Subsequent in-depth investigation revealed that the compliance officer had also manipulated 2 other shell companies and opened multiple accounts at several local banks to deal with about HKD 1.6 billion of suspicious funds since 2020, in collusion with a bank staff member to evade the bank's customer due diligence and transaction monitoring procedures. During an operation mounted by C&ED in October 2024, a total of 5 persons were arrested for conspiracy to commit ML or aiding in ML, namely the compliance officer and the company secretary of the MSO involved, 2 former directors of the shell companies and the bank staff member. The investigation is still ongoing.



4

Latest Anti-Money
Laundering and CounterFinancing of Terrorism
International Standards
最新反洗黑錢及恐怖分子資金籌集國際標準

As an international financial centre, Hong Kong adopts a multiagency approach in constructing its AML/CFT regime. Internationally, Hong Kong has been an active member of AML/CFT organisations, including FATF since 1991 and APG since 1997. Locally, a highlevel Central Coordinating Committee on AML/CFT, chaired by the Financial Secretary, steers the formulation of AML/CFT policies and the implementation of the regime concerned.

### 財務行動特別組織 (「特別組織」)

# The Financial Action Task Force ("FATF")

FATF is an inter-governmental body with 40 members established in 1989 to set AML/CFT standards and promote relevant measures at both national and international levels. FIIB provides substantial support to FATF, including attending its events (e.g. Plenary Meetings, Private Sector Consultative Forums and Joint Experts Meetings) to share insights with its Global Network, as well as assigning assessors to assist in MEs. Particularly in 2024, a Superintendent of Police, FIIB, was appointed as an assessor for Malaysia among the earliest group of delegations for the Fifth Round of ME.

FIIB also takes part in FATF projects as a co-lead and provides inputs including case studies and typologies on a regular basis. In 2024, FIIB co-led a FATF project on ML NRA Guidance Update with Mexico, which serves as the basis for other jurisdictions to conduct ML risk assessments. Given the importance of the project, it attracted an unprecedented number of team members from over 30 delegations and international organisations. FIIB officers played a crucial role in leading this diverse group. By adopting a data-driven and inclusive approach, the project not only involved extensive consultations, analysis and consolidation of contributions from both the public and private sectors across more than 90 jurisdictions worldwide, but also covered the review of ML risk assessment reports, ME reports and thematic studies from numerous jurisdictions and academic sources, as well as the fervent exchange of insights among global stakeholders.



■ 財富情報及調查科警司冼楚嘉(左)於2024年4 月在奧地利維也納擔任特別組織私營界別諮詢論 壇的專家講者,分享其對洗錢及恐怖分子資金籌 集風險評估的見解。

Superintendent of Police, FIIB, Mr SIN Chor-ka, Christopher (left), attends the FATF's Private Sector Consultative Forum in Vienna, Austria in April 2024 as an expert speaker in ML/TF risk assessment.

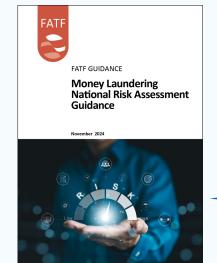
經修訂的《國家洗黑錢風險評估指引》於2024年10月在特別組織全體會議上通過,隨後於11月發布,既保留2013年版本的核心概念,亦為籌備、評估及評估後期階段,訂立更細緻的工作流程,更提供過去十年從全球網路收集的實際例子和最佳做法,並加入與特別組織最新標準看齊的元素,例如虛擬資產及新興科技的評估。

The updated Guidance was endorsed during the FATF Plenary in October and was promulgated in November 2024. While maintaining the core concept in its 2013 version, it sets out a more granular workflow at preparatory, assessment and post-assessment phases. Alongside practical examples and best practices gathered from the Global Network over the past decade, it also incorporates elements aligned with the latest FATF standards, such as the assessment of VAs and emerging technologies.



■ 財富情報及調查科總警司鄭麗琪(中)率團與墨西 哥代表團團長(右二),一同出席特別組織全體會 議,發表經修訂《國家洗黑錢風險評估指引》的文 件。

FIIB delegations led by Chief Superintendent of Police, Ms CHENG Lai-ki, Kelly (middle), and Mexico's delegation head (second from right) attend the FATF Plenary Meeting to present the updated ML NRA Guidance paper.



經修訂的《國家洗黑錢風險評估指引》於2024年11 月發布。

The updated ML NRA Guidance was published in November 2024.

財富情報及調查科警司冼楚嘉擔任「國家洗黑錢風險評估指」 引修訂專案」的共同領導,在特別組織的專訪中與全球網絡 分享灼見。

Superintendent of Police, FIIB, Mr SIN Chor-ka, Christopher, as the project co-lead of the ML NRA Guidance Update, shares his insights with the Global Network in FATF's topical interview.



# 亞洲/太平洋反清洗錢組織 (「亞太反洗錢組織」)

亞太反洗錢組織於1997年正式成立,屬區域反洗錢組織,通常稱為「與特別組織性質相若的區域組織」,現有42名成員,而香港是13個創始成員之一,並活躍至今。

## The Asia/Pacific Group on Money Laundering ("APG")

APG is a regional AML body officially established in 1997, which is often referred to as a FATF-Style Regional Body. To date, APG consists of 42 members. Hong Kong as one of its 13 founding members has remained active since then.



■ 財富情報及調查科總督察代表中國香港於2024年11月在 馬來西亞吉隆坡出席2024年亞太反洗錢組織案例分析工作 坊,並發表演説。

Chief Inspector of Police, FIIB, presents on behalf of Hong Kong, China in the 2024 APG Typologies Workshop in Kuala Lumpur, Malaysia in November 2024.

2024 APG ANNUAL MEETI

財富情報及調查科總督察(左)於2024年9月在阿聯酋阿布扎比出席2024年亞太反洗錢組織周年會議。

Chief Inspector of Police, FIIB (left), attends the 2024 APG Annual Meeting in Abu Dhabi, UAE in September 2024.

2024年3月,本科舉辦亞太區首個第五輪相互評估評核人員培訓課程,邀請特別組織、亞太反洗錢組織及國際貨幣基金112名海外代表及112名海外代表及112名海外代表及112名海外代表及112名海外代表及112名海外代表與實際。 監會及其他相關政府部門的人員參與話會及其他相關國家進行評估,包括與國家進行其反洗錢及恐怖分子資金籌集法例和告,與大戶之體成員匯報,方可獲取評核人員的資格。 In March 2024, FIIB hosted its first Joint Assessor Training for the Asia-Pacific region for the Fifth Round of ME. Delivered by trainers from FATF, APG and the International Monetary Fund ("IMF"), the course brought together 32 overseas representatives and 11 local participants from the Force, FSTB, HKMA, SFC and other relevant government departments, during which they had to work through the evaluation of a fictional country, including reviews of its AML/CFT legislation and regulations, mock interviews, ME report preparation and plenary presentation, prior to attaining qualification as assessors.

財富情報及調查科總警司鄭麗琪(中)向特別組織、亞太反洗錢組織及國際貨幣基金組織的導師致送紀念品。

Chief Superintendent of Police, FIIB, Ms CHENG Lai-ki, Kelly (centre), presents souvenirs to trainers from FATF, APG and IMF.





■ 時任財經事務及庫務局副秘書長陳詠雯主持課程啟 動禮。

The then Deputy Secretary for Financial Services and the Treasury, Ms Manda CHAN Wing-man, officiates at the launching ceremony of the course.

### 特別組織相互評估

香港曾於2019年進行第四輪相互評估,其 打擊洗錢及恐怖分子資金籌集制度整體獲 評為合規有效,而下一輪評估將於2029-30 年度進行。為籌備第五輪相互評估,財富 情報及調查科正與財經事務及庫務局緊密 合作,持續完善上述制度,與特別組織的 標準對標,包括近年經改良的標準,即法 24至第25項建議),以及資產追討(第38 項建議);另亦會繼續與其他持份者支援 該局,全力推進相關工作。

### 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為系統化過程,目的是辨識和評估本港的相關風險,這對於制定和實施有效的打擊略尤為重要。財富情報及調查科風險評估小組是洗錢及恐怖分子資金籌集風險評估督導委員會的成員之一,而該委員會的財、督導委員會務局主導,並由各政府部門、監管機構及執法機關組成,負責監督風險評估的工作。

2022年,第二次香港洗錢及恐怖分子資金 籌集風險評估評定本港面對的洗錢風險為 中高水平,恐怖分子資金籌集及大規模毀 滅武器擴散資金籌集風險則屬中低水平。 第三次風險評估現正籌備中,報告訂於 2025年發布。為使各持份者掌握新模組及 洗錢威脅和手法的最新趨勢,本科於2024 年1月舉辦工作坊,吸引各執法機關、金融 監管機構和政府部門代表及指定非金融業 人士參加。

### **FATF Mutual Evaluations ("ME")**

During the Fourth Round of ME in 2019, Hong Kong's AML/CFT regime was assessed to be compliant and effective overall. To prepare for Hong Kong's Fifth Round of ME in 2029-30, FIIB is working closely with FSTB to continuously enhance Hong Kong's AML/CFT regime, benchmarking against FATF standards, including its enhanced standards on transparency and beneficial ownership of legal persons and legal arrangements (i.e. Recommendations 24 and 25) and asset recovery (i.e. Recommendation 38) over the past few years. In collaboration with other stakeholders, we will continue to support FSTB in fully driving the efforts required.

# Money Laundering and Terrorist Financing Risk Assessment in Hong Kong ("HRA")

HRA as a systematic process aims to identify and evaluate the risks associated with ML/TF within the territory. This process is crucial for the development and implementation of effective AML/CFT strategies. FIIB Risk Assessment Section is part of the Steering Committee of HRA, which is led by FSTB and comprises various government agencies, regulators and LEAs to oversee the conduct of HRA.

Following the second HRA in 2022, Hong Kong was assessed as facing a medium-high level of ML risk and a medium-low level of TF and proliferation financing risk. Preparation for the third HRA is in progress, with the report scheduled for publication in 2025. To update all stakeholders on the new modules and the trends of ML threats and typologies, FIIB held a workshop in January 2024, gathering representatives from LEAs, financial regulators and government bodies, as well as DNFBPs.



■ 財富情報及調查科舉辦持份者工作坊,講解洗黑錢威 脅和手法的最新趨勢。

FIIB conducts the Stakeholders Workshop to update the trends of ML threats and typologies.



執法機關、金融監管機構和政府部門的代表參加工作坊。 Representatives of LEAs, financial regulators and government bodies attend the workshop.

### 大灣區洗錢及恐怖分子 資金籌集風險評估

首個跨司法管轄區洗錢及恐怖分子資金籌集風險評估旨在加強評估和管理內地及港澳三地的相關跨境風險。此項目由中國人民銀行主導,並由財經事務及庫務局和澳門金融情報辦公室支援,籌備工作將於2025年1月展開,而評估報告訂於同年發布。是項區域風險評估既解決主要問題,亦為特別組織建議的良好做法實例。

# **Greater Bay Area ML/TF Risk Assessment**

The first-ever cross-jurisdictional ML/TF risk assessment aims to strengthen the assessment and management of cross-boundary risks involving Chinese Mainland, Hong Kong and Macao. Led by the People's Bank of China and supported by FSTB and the Financial Intelligence Office of Macao, the project will begin preparation in January 2025, with its report scheduled for publication in 2025. While addressing the key concern, this regional risk assessment will also reflect good practice recommended by FATF.

# Money Laundering Expert Cadre 「洗黑錢專家」



「洗黑錢專家」為自願兼任職務隊,由財富情報及調查科於2022年底成立,至今已培訓75名成員,包括各執法機關及監管機構人員。

Established in late 2022 by FIIB, the Money Laundering Expert Cadre ("MLEC") has trained a total of 75 members, including officers from various LEAs and regulators.

### 「洗黑錢專家」成立目的 Objectives of MLEC



提升警隊打擊洗黑錢活動的專業水平和能力 Strengthening the Force's professionalism and capability in combating ML activities





支援前線進行財富調查 Supporting the frontline in financial investigation



就洗黑錢案件申請加刑 Applying for enhanced sentencing in ML cases

「洗黑錢專家」成員須具備相關經驗及學歷和專業資格,受過密集訓練,掌握香港反洗 黑錢及恐怖分子資金籌集法例和政策、特別 組織標準、全球洗黑錢手法、法證會計概念 和技巧及專家證人必備素質,方可成為專家 證人,以支援前線調查隊進行財富調查,並 出庭就財富資金流向及個案類型提供專家證 供。2024年7月,「洗黑錢專家」的證供首 次獲法庭接納為證據。 Equipped with relevant experience, as well as academic and professional qualifications, MLEC members serve as expert witnesses after intensive training on AML/CFT legislation and policies in Hong Kong, FATF standards, global ML typologies, forensic accounting concepts and skills, as well as the essential qualities of an expert witness, with the role of supporting frontline investigation teams in financial investigation and giving expert evidence on financial fund flows and typologies in court. In July 2024, the first testimony of a Money Laundering Expert was admitted as evidence in court.

為支援前線財富調查,「洗黑錢專家」成 員已舉辦多場分享會,向前線人員講述洗 黑錢調查、檢控及加刑申請的主要觀察所 得,冀提高其財富調查能力。

「洗黑錢專家」成員緊貼業界發展,掌握 行內新知,持續透過專業培訓,提升自身 技巧及專業資格。本科於2023年4月與新 加坡特許會計師協會簽署合作諒解備忘 錄,至今已有30名「洗黑錢專家」成員成 功在法證會計及調查方面獲取該協會的金 融法證專業資格。全體「洗黑錢專家」成 員另亦成為「公認反洗錢師」,擁有行內 最備受認可的資格之一。

為提升「洗黑錢專家」成員的專業水平, 經挑選的成員會獲提名出席國際會議及 外培訓課程,藉此機會接觸反洗黑錢的最 佳做法及先進技術,並與國際專家和同行 互動,交流豐富知識,深入了解此範疇的 全球趨勢及挑戰,繼而可採取更有效的策 略,提高整體工作效率。

### 加重刑罰

有見利用錢騾帳戶的洗黑錢案件日增,本科(包括「洗黑錢專家」)和律政司已訂立程序,內容關乎如何就該等案件根據《有組織及嚴重罪行條例》(第455章)第27條申請加刑。2024年,法庭已根據「洗黑錢專家」秘書處的專家意見,對47名被告人加重12.5% 至33.3% 的刑罰,以加強對錢騾的阻嚇力。

To support frontline financial investigation, MLEC members conducted sharing sessions for frontline officers on key observations in ML investigations, prosecutions and applications for enhanced sentencing, thereby strengthening their capabilities in financial investigation.

In their pursuit of relevance and knowledge in the field, MLEC members have embraced continuous professional training to enhance their skills and professional qualifications. Following the signing of a Memorandum of Understanding by FIIB with the Institute of Singapore Chartered Accountants ("ISCA") in April 2023, a total of 30 members successfully attained the ISCA Financial Forensic Professional Credential in Forensic Accounting and Investigation. In addition, all members are also Certified Anti-Money Laundering Specialists, one of the most recognised certifications in the AML field.

To enhance their professionalism, selected MLEC members are nominated to attend international conferences and overseas training programmes. These experiences offer exposure to AML best practices and advanced techniques, while engaging with international experts and peers fosters richer knowledge exchange and a deeper understanding of global trends and challenges in the field—all of which enable them to implement more effective strategies and boost overall operational efficiency.

### **Enhanced Sentencing**

With the growing exploitation of money mule accounts in ML cases, FIIB (including MLEC) and DoJ have established a protocol on the application for sentence enhancement under Section 27 of the Organized and Serious Crimes Ordinance (Cap. 455) in such cases. In 2024, the sentences of 47 defendants were increased by 12.5% to 33.3% based on the expert opinion of the MLEC Secretariat, strengthening the deterrent effect against money mules.



「洗黑錢專家」成員為前線單位舉 辦知識分享會。

MLEC members conduct knowledge sharing sessions with frontline units.





「洗黑錢專家」成員於2024年9月出席進修課程及周年會議。 MLEC members attend the refresher course and annual meeting in September 2024.



■「洗黑錢專家」代表於新加坡出席新加坡特許會計師協會大型會議2024。

MLEC representatives attend the ISCA Flagship Conference 2024 in Singapore.

「洗黑錢專家」主管鄭麗琪率領17名「洗黑錢專家」成員首次到內地培訓,赴杭州考察內地科技公司如何應用人工智能技術分析大數據,以管理金融犯罪風險和偵測洗黑錢活動。

OC MLEC, Ms CHENG Lai-ki, Kelly, leads a delegation of 17 MLEC members on their first Mainland training visit to Hangzhou, where they examine how Mainland technology companies apply Al in big data analysis for financial crime risk management and ML detection.





「洗黑錢專家」代表總督察郭進傑於奧地利維也納出席 聯合國毒品和犯罪問題辦公室所舉辦的特別組織聯合專 家會議,並發表有關資產追討的演説。

MLEC representative, Chief Inspector of Police, Mr KWOK Chun-kit, delivers a presentation on asset recovery at the FATF Joint Experts' Meeting hosted by the United Nations Office on Drugs and Crime in Vienna, Austria.

### 專家陳述書(用作支持檢控)

### **Expert Statements in Support of Prosecution**

### 個案研究1

2018年,4宗不同類型騙案的得益分別存入3個公司銀行戶口,總額為650萬港元,而該等戶口的唯一簽署人同為A君;調查顯示,他曾使用其企業及個人戶口作洗黑錢用途。

「洗黑錢專家」遂應律政司的要求,全面分析A君22個戶口的資金流向,識別主要的洗黑錢模式及特徵,以證明他曾清洗3,500萬港元的騙案得益,繼而支持檢控的決定。2024年10月,A君於區域法院被裁定罪成並判監36個月。

### Case Study 1

In 2018, a total of HKD 6.5 million in proceeds from 4 scams of various nature were found deposited into 3 company bank accounts, of which Individual A was the sole signatory. Investigation revealed that he had used both his corporate and personal accounts for ML activities.

At the request of DoJ, MLEC conducted a comprehensive fund flow analysis across 22 accounts held by Individual A, identifying key patterns and hallmarks of ML to support the prosecution in proving that he had laundered a total of HKD 35 million in crime proceeds from various scams. Individual A was convicted at the District Court in October 2024 and sentenced to 36 months' imprisonment.

### 個案研究2

### Case Study 2

In mid-2024, MLEC provided an expert affirmation concerning an ML charge in the Court of Appeal. The affirmation clarified that layering aimed to obscure and conceal the origin of illicit funds, either for the predicate offence or the ML process itself, which hindered the investigation by LEAs as further analysis is required. Transfer among same-name bank accounts, regardless of whether it is intra-bank or inter-bank, will impede the swift interception of funds. The affirmation offered a clear and credible assessment that articulated investigative challenges and refuted the appellant's claim. The Court of Appeal then accepted the affirmation and dismissed the appeal on this issue.

### 專家陳述書(用作支持加刑)

### **Expert Statements in Support of Sentence Enhancement**

### 個案研究3

2019年10月,5名受害人墮入低息貸款騙局,合共將47萬港元存入5個本地銀行戶口,而其中1萬港元存入B君戶口。

2022年12月,B君被捕;經調查後,被控1項洗黑錢罪,涉嫌於2019年6月至2020年5月期間經其戶口清洗700萬港元。其後,在區域法院否認控罪,惟於2025年5月經審訊後裁定罪成,最終加刑25%(即12個月監禁),總刑期增至60個月監禁。

### Case Study 3

In October 2019, 5 victims fell prey to low-interest loan scams and deposited a total of HKD 470,000 into 5 local bank accounts, of which HKD 10,000 was deposited into an account held by Individual B.

In December 2022, Individual B was arrested. Upon investigation, he was charged with 1 count of ML involving HKD 7 million through his account between June 2019 and May 2020. He pleaded not guilty at the District Court but was convicted after trial in May 2025. Individual B then received a 25% sentencing enhancement (i.e. 12 months' imprisonment), making his total sentence 60 months' imprisonment.

### 個案研究4

2022年3月,警方調查1宗失蹤人口案件, 其間發現某洗黑錢集團曾欺騙他人交出銀行 或加密貨幣戶口,並非法將其禁錮於酒店, 以便進行洗黑錢活動。

經進一步調查後,共有18人被捕;其中,C 君涉嫌於2022年3月至6月期間清洗1,870萬港元,被控兩項串謀洗黑錢罪,另控以3項串謀非法禁錮罪。2024年5月,法庭宣判總刑期為75個月監禁,包括就兩項串謀洗黑錢罪各加刑33.3%(即12個月監禁)。

### Case Study 4

In March 2022, while investigating a missing person case, the Police uncovered an ML syndicate that had deceived victims into handing over their bank or cryptocurrency accounts and unlawfully detained them in hotels to facilitate ML activities.

Upon further investigation, 18 persons were arrested, among whom Individual C was charged with 2 counts of conspiracy to commit ML involving HKD 18.7 million between March and June 2022, along with 3 counts of conspiracy to commit unlawful detention. In May 2024, the court handed down a total sentence of 75 months' imprisonment, including a 33.3% sentencing enhancement (i.e. 12 months' imprisonment) for each of the 2 charges of conspiracy to commit ML.

# Capacity Building and Outreach 培訓及外展

為應付新興的洗黑錢環境,財富情報及調查科致力提升警隊打擊洗黑錢及恐怖分子資金籌集的能力;年內,已安排多個財富調查課程及本地和海外職業培訓課程,確保人員具備所需技能之餘,亦擴大與伙伴的合作範圍。

In response to the emerging ML landscape, FIIB is committed to strengthening the Force's AML/CFT capability. To ensure officers are equipped with essential skillsets and foster broader collaboration with our partners, specialised financial investigation courses and local and overseas vocational training programmes were arranged in 2024.

### 財富調查課程

為增進人員在財富調查、財富情報分析及資產追討程序方面的專業知識,本科會定期舉辦為期五日的財富調查課程,既講解各項調查工具及技巧,亦會透過分組模擬練習,讓學員分析資金流向和查詢財務,吸。2024年,課程於4月和10月開辦,吸引逾120名人員參加,分別來自香港警務處、香港海關、入境事務處、廉政公署及公司註冊處。

### **Financial Investigation Course**

The five-day Financial Investigation Course ("FIC") is conducted regularly to enhance officers' expertise in financial investigation, financial intelligence analysis and asset recovery procedures. Along with lectures on investigative tools and techniques, FIC also features group-based, hands-on simulation exercises for participants to perform fund flow analysis and conduct financial profile inquiries. In 2024, FICs were held in April and October, with over 120 participants from HKPF, C&ED, the Immigration Department, the Independent Commission Against Corruption ("ICAC") and the Companies Registry.



■財富調查課程2024 FIC 2024

本科亦持續推陳出新,推出國際財富調查課程,務使內容不再局限於提升本地人員的相關專業知識,而是加強國際合作。2024年,國際財富調查課程(普通話班)及(英文班)分別於7月和11月開辦,吸引本地執法機關人員參加之餘,亦有來自13個其他司法管轄區的50名學員。上述課程不僅為全球各持份者提供平台,交流反洗黑錢及恐怖分子資金籌集的最佳做法,並訂立相關標準,更促進彼此聯繫,加強合作,以打擊洗黑錢及恐怖分子資金籌集活動。

FIIB's efforts with FIC have evolved beyond improving local officers' expertise in financial investigation to hosting the International FIC for strengthening global collaboration. In July and November 2024, the respective International FIC (Putonghua Class) and (English Class) welcomed not only officers from local LEAs, but also 50 participants from 13 other jurisdictions, providing a platform to exchange and benchmark AML/CFT best practices across the globe, while also fostering rapport for enhanced collaboration in the fight against ML/TF.

財富情報及調查科總警司鄭麗琪(前排中)於2024年11月參與為期五日的國際財富調查課程(英文班)。

Chief Superintendent of Police, FIIB, Ms CHENG Lai-ki, Kelly (centre, front row), joins the five-day International FIC (English Class) in November 2024.





■ 學員討論各項反洗黑錢議題。 Participants discuss various AML issues.

### 知識分享會

除了舉辦內部培訓外,本科亦會定期或應 邀到警隊各單位授課,包括入門級的標準 刑事調查課程,為人員日後的刑偵工作做 好準備;以及進階級的商業罪案調查課 程,講授專業知識及調查策略,以助學員 應付複雜的商業騙案。此等分享會大大提 升人員的能力,使其作更充分的準備,打 擊日見精密的金融罪行。

### 專業發展

### **Knowledge Sharing Sessions**

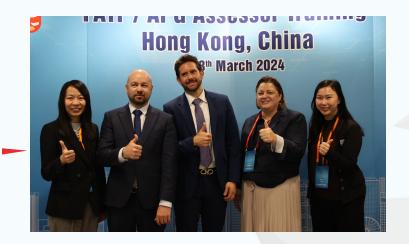
Beyond in-house training, FIIB delivers lectures to various Force units, either regularly or upon invitation, including the Standard Criminal Investigation Course, which provides introductory-level training to prepare officers for crime investigation; as well as the Commercial Crime Investigation Course, which offers advanced-level training in professional knowledge and investigative strategies to address complex commercial fraud cases. These sharing sessions have significantly enhanced officers' competence and readiness to tackle sophisticated financial crimes.

### **Professional Development**

Continuous learning is key to keeping abreast of the latest ML trends. FIIB has been sending its officers to external training, such as the ICAC Professional Development Programme on Financial Investigation and Asset Recovery, VA seminars, webinars and conferences, while remaining committed to fulfilling its obligations as a member of FATF and APG at the international level. In 2024, FIIB nominated 4 officers to attend the FATF Assessor Training and the ICRG Reviewer Training. In March 2024, FIIB hosted the first Joint Assessor Training for the Asia-Pacific Region for the Fifth Round of ME in Hong Kong, where participants learnt about AML/CFT legislative frameworks and engaged in mock interviews, ME report preparation and plenary presentations.

兩名財富情報及調查科人員(左和右)出席亞太區首個第五輪相互評估評核人員培訓課程。

Two FIIB officers (left and right) attend the first Joint Assessor Training for the Asia-Pacific Region for the Fifth Round of ME.



### 業界持份者培訓

本科會定期舉辦反洗黑錢及恐怖分子資金籌集講座,內容專為金融機構、監管機構、業界持份者及指定非金融業人士內內。 設持,以提供重要平台,讓彼此分享行內內。 最佳做法,並適時掌握新興的洗黑錢趨勢 及手法;其間,講者會重點講述可疑變勢 及手法;其間,講者會重點講述可讓 對於者具備實用知識和工具後,更有資 負測、防範和緩減洗黑錢及恐怖分子資金 籌集風險。

為促進與業界持份者交流,保持良好溝通,另亦舉辦「金融業反洗黑錢研討會2024」,匯聚逾200名來自執法機關、金融監管機構及逾40間金融機構的代表,讓他們藉此機會分享真知灼見,探討如何在瞬息萬變的洗黑錢環境下應對新挑戰。

### **Training for Industry Stakeholders**

FIIB regularly organises AML/CFT seminars specifically tailored for FIs, regulators, industry stakeholders and DNFBPs. These seminars serve as an essential platform for sharing industry-specific best practices and delivering timely updates on emerging ML trends and typologies. By highlighting the latest red flags and indicators of suspicious financial activities, FIIB proactively equips industry stakeholders with practical knowledge and tools to effectively detect, prevent and mitigate ML/TF risks within their operations.

To foster dialogue and maintain strong communication with industry stakeholders, FIIB's Financial Institutions AML Forum 2024 gathered over 200 representatives from LEAs, financial regulators and more than 40 FIs to share insights on addressing emerging challenges in the ever-evolving ML landscape.



是次研討會共有逾200名各界持份 者出席,冀加強合作,共同打擊洗 黑錢活動。

The forum gathers over 200 stakeholders from different sectors with a view to strengthening and synchronising AML efforts.

香港金融發展局總監及主管(政策研究)董一岳博士主持首場專題小組討論,題為「反洗黑錢的策略方針」。

The Director & Head of Policy Research, Financial Services Development Council, Dr Rocky TUNG, moderates the 1<sup>st</sup> panel discussion on "Combating Money Laundering on a Strategic Level".





**陳景宏**Mr Raymond CHAN
金管局助理總裁
(法規及打擊清洗黑錢)
Executive Director (Enforcement and AML) HKMA

推廣創科應用是金管局打擊洗黑錢活動的另一重心。金管局會進一步鼓勵銀行採用合規科技(尤其利用人工智能技術監察交易),借助數據和網絡分析技術,更有效偵測和防範騙案之餘,亦助其管理長期制裁風險。

Promoting innovative technology is another key focus for HKMA in combating ML. HKMA will further encourage banks to adopt Regtech, particularly through the use of AI for transaction monitoring, and to employ data and network analysis techniques to more effectively detect and prevent scams. This will also help them manage extended sanction risks.

「風險為本」的做法乃全球公認反洗黑錢策略,首要一步是了解自身風險;特別組織已訂立40項國際反洗黑錢建議,而首項基本建議便是要各地及各金融和非金融機構先評估和明白其洗黑錢風險,再實施相應的緩減措施。

The globally recognised AML strategy is "risk-based". The first crucial step is to understand the risks we face. FATF has established 40 international AML recommendations. The first and foundational recommendation requires each region and both FIs and non-FIs to assess and understand their ML risks and implement corresponding mitigation measures.



**冼楚嘉 Mr Christopher SIN** 財富情報及調查科警司 Superintendent of Poli<u>ce FIIB</u>



麥永賢 Mr Tony MAK 中國工商銀行(亞洲) 防範金融犯罪部主管 Head of Financial Crime Compliance Department ICBC (Asia)

本行系統能偵測客戶戶口的多筆大額交易,後續分析曾成功揭示1宗涉及傀儡戶口的騙案;我們另亦透過財富情報交換平台,與其他參與銀行分享欺詐活動和傀儡戶口的資料。

Our bank's system detected multiple large transactions in a customer's account. After analysis, we successfully uncovered a fraud case involving the use of a stooge account, and we shared information about fraudulent activities and stooge accounts with other bank members through FINEST.



財富情報及調查科總警司鄭麗琪主持第二場專題小 組討論,題為「科技在打擊洗黑錢上的應用」。

Chief Superintendent of Police, FIIB, Ms CHENG Lai-ki, Kelly, moderates the 2<sup>nd</sup> panel discussion on "The Use of Technology in Combating Money Laundering".

第二場專題小組討論題為「科技在打擊洗黑錢上的應用」。 The 2<sup>nd</sup> panel discussion on "The Use of Technology in Combating Money Laundering".

利用網絡分析識別可疑戶口和交易的做法有助追查資金流向,使執法機關更有效 打擊洗黑錢網絡;同時,亦將着眼點放在「預先識別潛在可疑客戶」,而非以往 的「事後調查、報告及分析」,令本行能夠由「一對一」模式,做到「一對多」 形式,能力得以提升之餘,效率更達到一般「交易後監察機制」的4倍。

Using network analysis to identify suspicious accounts and transactions helps track the flow of funds and assists law enforcement in more effectively combating ML networks. This shift from traditional emphasis on "post-incident investigation, reporting and analysis" to "pre-emptive identification of hidden suspicious clients" enhances our capability from a "one-to-one" model to a "one-to-many" approach, achieving 4 times the efficiency compared to typical post-transaction monitoring systems.



**鍾國亮**Mr Sum CHUNG
中國銀行(香港) 高級防洗黑錢經理
Senior AML Manager
Bank of China (Hong Kong)

李思平 Mr Vincent LI 螞蟻國際反洗黑錢中心資深總監 Senior Director, Global Compliance, Ant International

儲值支付工具的客戶群龐大,故我們必先處理高風險特徵/指標。為此,本公司已開發人工智能系統,以篩選和標示高風險特徵,讓合規團隊更有效進行檢討;另亦與電商平台合作,搜尋用家所購產品的關鍵字,以篩除敏感/高風險產品,並實施強化措施。

Stored value payment tools have a large customer base, so we must prioritise higher-risk characteristics/indicators. We have developed an Al system to filter and highlight higher-risk features, allowing compliance teams to conduct reviews more efficiently. We also collaborate with e-commerce platforms to conduct keyword searches on product names purchased by users, filtering out sensitive/high-risk products and implementing enhanced measures.

FINANCIAL INSTITUTIONS
AML FORUM
2024

是次研討會旨在加強執法機關、金融監管機構、金融 ■ 機構等反洗黑錢主要持份者的合作。

The purpose of this forum is to strengthen cooperation among key AML stakeholders, including LEAs, financial regulators and FIs.

### 公眾宣傳

正所謂「預防勝於治療」,財富情報及調查科自2021年舉辦「反洗黑錢月」,務求制訂針對性策略,有效向公眾宣揚反洗黑錢信息,提高其相關意識;2024年,本科的主要宣傳對象為 (i) 潛在錢騾;(ii) 學生及青少年;(iii) 業界持份者;以及 (iv) 廣大市民。

### 打擊潛在錢騾 加強阻 嚇力

### **Publicity**

As the old saying goes, "Prevention is better than cure". Since 2021, FIIB has been hosting the "AML Month", aiming to effectively communicate AML messages to the public through tailored strategies, thereby raising their AML awareness. In 2024, FIIB's publicity targeted on (i) potential stooges; (ii) students and youths; (iii) industry stakeholders; and (iv) the general public.

### Potential Stooges: Maximising Deterrent Effect

In 2024, 8,607 persons were arrested for ML, 89.23% of whom were stooge account holders (or so-called "money mules"). Certain groups, particularly low-income individuals, unemployed persons, foreign domestic helpers and Mainland residents, were found to be more susceptible to engaging in ML activities due to financial incentives. It is thus imperative to deliver clear and deterrent messages reminding them not to rent, lend or sell their bank accounts to others. To this end, FIIB has been collaborating closely with Consulates-General to co-organise informative sessions for foreign domestic helpers, as well as distribute the new AML comic, The Dirty Money Trap, posters and leaflets in Bahasa Indonesia and Tagalog to emphasise the severe consequences of ML, including enhanced sentencing and hefty fines.

### 教育學生及青少年 培育守法社會棟樑

青少年乃社會棟樑,故向其灌輸反洗黑錢信息和提高其相關意識尤為重要。本科既定期於中學及大學舉辦反洗黑錢講座和研討會,亦新推反洗黑錢微電影《左右人生》及漫畫《黑金陷阱》,冀以創新互動的形式,告誡年輕一代勿墮洗黑錢陷阱。

### 聯繫業界持份者 促進公私營合作

執法機關難以獨力杜絕洗黑錢活動;要促 進反金融罪行的協同效應,業界於宣傳活 動的參與至關重要。金融機構、監管機構 等持份者均身負重任,確立相關的政策和 做法,提升反洗黑錢成效;同時,亦透過 教育講座和工作坊,掌握最新的洗黑錢趨 勢和監管制度的轉變。為打擊傀儡戶口, 本科已聯同金管局籲請各銀行加強客戶盡 職審查措施,尤其針對高風險客戶,包括 實施更嚴格的監控(例如降低新客戶的貸 款額度或交易限額);收緊遙距開戶的盡 職審杳和杳核措施; 以及持續監察交易和 分析IP地址和登入裝置等數碼足跡。此番 合作不僅加強各業界持份者對合規工作的 承擔,更鼓勵其透過自身網絡分享最佳做 法和資源,使整體的反洗黑錢成效更彰。

### 凝聚廣大市民 鼓勵全城反洗黑錢

### Students and Youths: Nurturing Lawabiding Social Leaders

Youths represent the future of our society, making it essential to instill preventive messages and raise AML awareness among them. Alongside regular AML talks and seminars at secondary schools and universities, FIIB also released the AML microfilm, Your Life, Your Choice, and the AML comic, The Dirty Money Trap, with a view to reminding youths not to fall into ML traps in an innovative and interactive way.

### **Industry Stakeholders: Fostering Public-Private Partnership**

LEAs cannot combat ML alone. Engaging the industry in AML publicity activities is crucial for fostering synergy in the fight against financial crime. Fls, regulators and other stakeholders play a vital role in shaping policies and practices that enhance AML effectiveness. Through educational seminars and workshops, they are well-informed about current ML trends and regulatory changes. To tackle stooge accounts, FIIB has solicited the support of HKMA and called on banks to enhance customer due diligence measures, particularly for highrisk customers, including more stringent controls such as reduced credit limits or thresholds for new customers; tightened due diligence and inspection during remote onboarding; and ongoing transaction monitoring and cyber footprint analysis, i.e. IP addresses and login devices. This collaboration not only strengthens industry stakeholders' commitment to compliance but also encourages them to share best practices and resources within their networks, amplifying the overall impact of AML efforts.

### The General Public: Promoting AML for All

Equally important is engaging the general public in AML publicity. Raising public awareness helps create a vigilant community against potential scams and fraudulent activities. In 2024, public outreach efforts were widespread across both online and offline platforms, such as the AML promotional truck and social media posts, highlighted by the Anti-Scam Carnival held on 14 and 15 December, all aimed at educating individuals about ML risks and the importance of safeguarding personal data. By equipping the public with knowledge and practical strategies, we create a united front against ML, thereby enhancing the effectiveness of our campaigns and fostering a safer and more secure financial environment for everyone.



財富情報及調查科推出反洗黑錢宣傳車「保戶號」,強調 保護個人銀行戶口的重要性。

FIIB launches the AML promotional truck to emphasise the importance of safeguarding personal bank accounts.



財富情報及調查科推出全新的反洗黑錢漫畫《黑金陷 · 阱》及微電影《左右人生》。

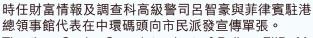
FIIB releases the new AML comic, The Dirty Money Trap, along with the AML microfilm, Your Life, Your Choice.





■ 財富情報及調查科人員與印尼駐港總領事館代表在九 龍清真寺暨伊斯蘭中心推廣反洗黑錢信息。

FIIB officers promote AML messages at the Kowloon Mosque and Islamic Centre with representatives of the Consulate General of the Republic of Indonesia in Hong Kong.



The then Senior Superintendent of Police, FIIB, Mr LUI Che-ho, Philip, and the representative of the Philippine Consulate General in Hong Kong distribute leaflets to the public at the Central Pier.





■ 財富情報及調查科人員與油尖警區「寶石計劃」成員合作,向非華裔少年警訊會員宣傳反洗黑錢漫畫;該漫畫已備多國語言版本,包括英文、菲律賓文及印尼文。 FIIB officers collaborate with members of "Project Gemstone" initiated by Yau Tsim District in promoting the multilingual AML comic, including versions in English, Tagalog and Bahasa Indonesia, to Non-Ethnic Chinese Junior Police Call members.

財富情報及調查科人員於多間大學舉辦反洗黑錢講座,教育學生有關洗黑錢的法例,提高其對反洗黑 錢措施的認識,並透過個案研究分享實用策略。

FIIB officers hold AML seminars at universities to educate students on ML-related legal framework, raise awareness of AML measures and share practical strategies through case studies.





財富情報及調查科與商業罪案調查科及網絡安全及科技罪案調查科於2024年12月一連兩日在西九文化區舉辦「全城 反詐嘉年華」,吸引逾兩萬人參與。

FIIB, together with the Commercial Crime Bureau and the Cyber Security and Technology Crime Bureau, hosts the two-day Anti-Scam Carnival in December 2024 at the West Kowloon Cultural District, attracting over 20,000 people.

# Future Challenges and Risks 未來挑戰與風險



### 未來的反洗黑錢挑戰

### **Future AML Challenges**

### 1. 犯案趨勢及洗黑錢手法多變

隨着人工智能等科技日新月異,新型罪案亦可能相應而生,令執法機關需適應多變的犯罪環境,成為其一大挑戰。洗 黑錢手法日見精密,執法機關必先做好防範,方能有效打擊潛在的上游罪行。

### (1) Evolving Crime Trends and ML Avenues

The ongoing development of technology, such as AI, is likely to lead to the emergence of novel crimes, posing significant challenges for LEAs in adapting to an evolving crime landscape. As ML methods continue to proliferate, LEAs must stay ahead of these trends to effectively address the underlying predicate offences.

### 2. 跨地域界限與地緣政治問題

先進科技能打破地域界限,使跨境交易 不受此限;惟金融體系和資產去中心化 可進一步加劇此類金融罪行全球化,令 不法之徒更容易利用司法管轄區的法律 漏洞,而奈何執法機關的跨境合作往往 趕不及上述變化,無疑對有效打擊全球 洗黑錢活動構成重大挑戰。

### (2) Diminishing Geographical Boundaries and Geopolitical Issues

Technological advancement has diminished geographical boundaries, enabling cross-border transactions without limitations. This globalisation of financial crime can be further catalysed by the decentralisation of financial systems and assets, making it easier for criminals to exploit loopholes in various jurisdictions. Unfortunately, cross-border cooperation among LEAs has not kept pace with this rapid evolution, resulting in significant challenges in effectively combating ML on a global scale.



### 本科的對策

為應對上述反洗黑錢挑戰,財富情報及調查 科採取以下四大方針:

### 1. 風險為本

為符合特別組織的國際反洗黑錢標準,香港(包括香港警務處)採用風險為本的做法,此舉對了解警政和確保資源更集中、更有優次地投放至關重要。《香港洗錢及恐怖分子資金籌集風險評估報告》為香港奠定基礎,制訂精準的反洗黑錢措施。

### 2. 借助科技

科技投資乃提升工作效率和成效的關鍵。執法機關可利用先進工具和系統作監察、分析和報告,加強其偵測和防範洗黑錢活動的能力。財務數據分析平台及其他網上洗黑錢調查工具正是最佳實例,前者能將向金融機構發出通知及及時分子資金籌集調查人員而設,兩者皆印證香港警務處善用科技提速提效。

### 3. 提倡合作

合作乃應付跨地域挑戰的要素。深化全球執法機關、金融機構和監管機構之間的合作能夠加強情報分享,有利各方攜手防範和偵測全球洗黑錢活動,並有效追討資產。香港警務處會繼續積極發掘更多機會,務求與全球對口單位緊密合作。

### 4. 重視培訓

培訓對執法機關尤為重要,以有效打擊洗黑錢活動,適應多變的金融罪行環境。香港警務處就內部培訓持續投入資源,以增進各級人員的技巧和知識;外部培訓則包括舉辦研討會、工作坊、外展活動及公眾宣傳活動,以提升各持份者的反洗黑錢意識和能力。此舉最終能使整個社會應對日見精密的金融罪行,繼而維護香港金融體系的穩健。

### **Our Countermeasures**

To address the above AML challenges, FIIB adopts a "4As" approach:

### (1) Assuring a Risk-based Approach

In line with international AML standards set by FATF, Hong Kong (including HKPF) implements a risk-based approach, which is essential for understanding the policing landscape and ensuring a focused and prioritised allocation of resources. HRA reports form an important basis for Hong Kong in formulating targeted responses against ML.

### (2) Applying Technology

Technology investment is crucial to enhancing operational efficiency and effectiveness. By adopting advanced tools and systems for monitoring, analysis and reporting, LEAs can improve their capacity to detect and prevent ML activities. FDAP, as an automation for issuing notification letters to FIs, along with other online ML investigative tools for ML/TF investigators, are solid examples of HKPF's technology application that has enhanced operational efficiency and effectiveness.

### (3) Advocating Collaboration

Collaboration is essential in addressing the challenges posed by diminishing geographical boundaries. Strengthening partnerships among international LEAs, FIs and regulators will enhance information sharing and facilitate co-ordinated efforts to prevent and detect ML on a global scale, as well as to effectively recover assets. HKPF will continue to proactively explore opportunities to collaborate with our international counterparts.

### (4) Adopting Capacity Building

Capacity building is vital for LEAs to effectively combat ML and adapt to the evolving landscape of financial crime. Within HKPF, this involves investing in comprehensive training programmes that enhance the skills and knowledge of personnel at all levels. Externally, capacity-building efforts include seminars, workshops, outreach activities and public awareness campaigns to enhance the AML awareness and competence of various stakeholders. Ultimately, robust capacity-building initiatives will empower the entire community to navigate the intricate dynamics of financial crime and uphold the integrity of Hong Kong's financial system.

### 結語

香港與其他司法管轄區同樣面臨重重挑戰。 詐騙案的升勢、虛擬資產的普及乃至跨境網 上交易的便利,通通伴隨着威脅。要減低此 等風險,便需要全方位、多管齊下的策略, 包括借助科技創新、完善監管系統和加強國 際合作。持續投資先進科技能使香港在處理 和分析金融數據方面佔優,更精準地偵測洗 黑錢活動,而加強與本地及國際持份者合作 則可填補監管缺口,提高執法效率。

未來數年,財富情報及調查科會繼續與各持份者攜手合作,在行動方式和應變方面力臻卓越,鞏固香港作為全球首屈一指的國際金融中心之地位。

### **Closing Remarks**

Like many other jurisdictions, Hong Kong faces significant challenges. The rise of deception, the increased popularity of VAs, as well as the ease of cross-border online transactions, all present threats. Mitigating these risks requires a comprehensive, multi-pronged strategy that encompasses technological innovation, robust regulatory systems and enhanced international co-operation. By continuing to invest in advanced technology, Hong Kong can gain an upper hand in processing and analysing financial data, enabling more accurate detection of ML. Fostering closer collaboration with local and international stakeholders will also help bridge regulatory gaps and enhance enforcement effectiveness.

In the years ahead, FIIB will continue to work with its stakeholders to continuously refine operational methodologies and responsiveness to changes, reinforcing Hong Kong's standing as a preeminent global financial hub.



### 常用詞彙Glossary

簡稱 Abbreviations	English	中文
AML	Anti-Money Laundering	打擊洗錢/反洗錢/反洗黑錢
APs	Arrested persons	被捕人
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	恐怖分子資金籌集
DNFBPs	Designated Non-Financial Businesses and Professions	指定的非金融企業及行業
DoJ	Department of Justice	律政司
Egmont Group	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 Analytics Platform	財務數據分析平台
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
Fls	Financial Institutions	金融機構
FINEST	Financial Intelligence Evaluation Sharing Tool	財富情報交換平台
FIUs	Financial Intelligence Units	財富情報單位
FPS	Faster Payment System	快速支付系統
FSTB	Financial Services and the Treasury Bureau	財經事務及庫務局
HKMA	Hong Kong Monetary Authority	香港金融管理局/金管局
HKPF	Hong Kong Police Force	香港警務處

### 常用詞彙Glossary

簡稱 Abbreviations	English	中文
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
ISCA	Institute of Singapore Chartered Accountants	新加坡特許會計師協會
JFIU	Joint Financial Intelligence Unit	聯合財富情報組
LEAs	Law Enforcement Agencies	執法機關
ME	Mutual Evaluation	相互評估
ML	Money Laundering	清洗黑錢/洗錢
MLEC	Money Laundering Expert Cadre	洗黑錢專家
MSO	Money Service Operator	金錢服務經營者
NB	Narcotics Bureau	毒品調查科
NRA	National Risk Assessment	國家風險評估
ОСТВ	Organized Crime and Triad Bureau	有組織罪案及三合會調查科
ОТС	Over-the-counter	場外交易
SFC	Securities and Futures Commission	證券及期貨事務監察委員會/證 監會
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
SVF	Stored Value Facility	儲值支付工具
TAS	Transaction Analytics System	交易數據分析系統
TF	Terrorist Financing	恐怖分子資金籌集
VAs	Virtual Assets	虚擬資產
VASPs	Virtual Asset Service Providers	虛擬資產服務提供者
VATPs	Virtual Asset Trading Platforms	虚擬資產交易平台



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