##  新生支付跨境业务反洗钱调查表

## 一、基本信息

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| 1.联系信息 |
| 法定全称： | ICAN FINTECH USA LLC |
| 所在国别： | USA |
| 注册办公地： | 301 Union St, #21445, Seattle, WA |
| 营业主场所（若不同于注册地）： |  |
| 总部地址（若不同于注册地）： |  |
| 网址： | WWW.VCANFINTECH.COM |
| SWIFT码： | NIL |

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| 2.公司注册信息 |
| 企业识别码/注册号： | 604-003-892 |
| 企业识别码/注册类型： | LLC |
| 注册国家和/或注册地：<0} | SEATLE  |
| {0>Date of Incorporation / Establishment<}0{>注册/成立日期：<0} | 24/06/2016 |
| {0>Name of Regulatory Authority financial institution is registered with<}0{>金融机构注册所在地监管机关名称：<0} | FINCEN |
| 请确认此调查问卷是否涵盖贵机构的以下机构范围： |
| 总部和本国分支机构：[ ]  ✓是 [ ]  否 | 本国内附属公司：[ ]  是 [ ]  否 |
| 海外分支机构：[ ]  ✓是 [ ]  否 | 海外附属公司：[ ]  是 [ ]  否 |

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| 3.{0>Ownership and Executive Management<}0{>所有权、实际控制人与管理层<0} |
| {0>Is your institution publicly owned?<}0{>贵机构是否为上市公司？<0} <0} |  [ ]  是 [ ]  ✓否 |
| {0>If yes<}0{>若是，请提供交易所名称<0} |
| {0>please provide a list of beneficial owners who own, control or have power to vote for 25 percent or more of any class of voting securities or other voting interest (including their nominees, if their shares are held by nominees).<}0{>请提供持有、控制或有权对25%及以上的表决证券类进行表决的或其他表决权益（若其股份由名义持有者持有，应包括名义持有者）的受益人的名单<0} | {0>Name<}0{><0} |
| {0>Please provide names of your board of directors and executive management team of your institution(Use an attachment if you need more space)<}0{>请提供贵机构董事会或管理层成员的姓名（若空间不足可添加附件）<0} |  |
| 最终受益人（指最终拥有或控制客户的自然人和/或客户所办理的交易最终受益的自然人，包括对客户施加最终有效控制的自然人） | 姓名：郑观诚国籍：香港特别行政区居住国：香港出生日期：04/10/1965身份证号：C437782(4) |

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| {0>4 Business Details<}0{>4.业务信息<0} |
| {0>Purpose of maintaining relationship with our bank:<}0{>与我司保持业务关系的目的：<0} |
| {0>Please indicate the percentage of appropriate business activity your institution is involved.<}0{>请说明贵机构相关业务活动所占的比例<0} {0>Example:<}0{><0} |
| {0>Corporate banking business<}0{><0} | % |
| {0>Personal banking business<}0{><0} | % |
|  | % |
|  | % |
|  | % |
| {0>Treasury operations<}0{><0} | % |
|  | % |
|  | % |
| {0>Other<}0{><0} | % |
| {0>Does your institution maintain a presence in a country / countries other than where your institution is primarily registered and regulated?<}0{>贵机构是否在注册国籍以外的其他国家或地区设有营业机构？<0} | [ ]  {0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 若是，请列出分支机构/子公司的所在地： |  |
| 贵机构是否在伊朗、朝鲜、苏丹、叙利亚或古巴有经营活动，包括设立办公地点/分支机构，在上述国家拥有资产/投资，上述国家有业务往来？ | [ ]  {0>Yes [ ]  No<}100{>是 [ ] ✓否<0} |
| 若是，请列明业务详情 |  |
| 若否，贵机构是否有计划在上述国家开展经营活动？ | [ ]  {0>Yes [ ]  No<}100{>是 [ ] ✓否 |
| {0>Does your institution have any branches or subsidiaries operating in countries that are considered by the Financial Action Task Force to be “non-cooperative”?<}0{>贵机构（含分支机构/子公司）是否在FATF认定“高风险”国家（如：阿富汗、老挝、苏丹、安哥拉、巴拿马、叙利亚、波黑、厄瓜多尔、圭亚那、巴布亚新几内亚、乌干达、也门）有经营活动？<0}{0>If yes, please indicate the country.<}0{>若是，请指出该国家名称。<0} | [ ]  {0>Yes [ ]  No<}100{>是 [ ]  [ ] ✓否<0} |

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| 5. {0>Has your institution had any regulatory or criminal enforcement actions resulting from violations of anti-money laundering laws or regulations in the past five years?<}0{>过去五年中，贵机构是否因违反反洗钱法律或法规在注册地或其他国家受到过任何行政或刑事的处罚？<0} | [ ]  {0>Yes [ ]  No<}100{>是 [ ]  [ ] ✓否<0} |

## 二、反洗钱政策、操作方式及操作规程

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| 6.{0>Does your institution have written policies and procedures for prevention of money laundering and terrorist financing?<}0{>贵机构是否制定了书面的、旨在预防洗钱和恐怖融资的政策和操作规程？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 7.贵机构是否评估面临的洗钱风险，并制定相应的反洗钱政策及流程? | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 8.{0>Is your AML policies subject to approval by your institution’s Board or Senior Management?<}0{>贵机构的反洗钱政策是否须经董事会或高级管理层的审批？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 9.{0>Are the above policies and procedures applicable to head office, all branches and subsidiaries?<}0{>上述政策和操作规程是否适用于总部以及所有分支机构和子公司？<0}{0>If no, please provide a list of the branches and/or subsidiaries that are excluded, including the name and the location of the institution.<}0{>若否，请提供不适用的分支机构和/或子公司的名单，包括这些机构的名称和所在地。<0} | [ ] ✓ {0>Yes [ ]  No<}100{>是 [ ] 否<0} |
| 10.{0>Does your institution have policies and procedures covering relationships with Politically Exposed Persons (PEP’s) consistent with relevant regulatory requirements and industry best practices?<}0{>贵机构是否制定了与相关监管要求以及行业最佳实践一致的涉及与政治公众人物关系的政策和操作规程？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ] 否<0} |
| 11.{0>Does your institution have written policies and procedures regarding Know Your Customer (KYC) and AML matters that are in compliance with applicable local laws and regulations?<}0{>贵机构是否就了解您的客户（KYC）和反洗钱事宜制定的了符合当地现行法律和法规的书面的政策和操作规程？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 12.{0>Does your institution have policies and procedures that include the identification and reporting of unusual or suspicious activity?<}0{>贵机构是否制定了识别和报告异常或可疑活动的政策和操作规程？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 13.{0>Does your institution permit the opening of anonymous account by customers?<}0{>贵机构是否允许客户开设匿名账户？<0} | [ ]  {0>Yes [ ]  No<}100{>是 [ ]  [ ] ✓否<0} |
| 14.{0>In addition to regulatory inspection, does your institution have any internal audit function or other independent third party that review your AML/CTF policies and procedures on a regular basis?<}0{>除了监管审查外，贵机构是否设有内部稽核部门或委任其他独立第三方定期对反洗钱/反恐怖主义融资政策及操作规程进行审查？<0}{0>If yes, how frequently are these conducted?<}0{>若是，多长时间审查一次？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ] 否<0} |

## 三、了解您的客户、尽职调查与强化尽职调查工作

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| 15.{0>Does your institution have customer due diligence and enhanced customer due diligence program in place to identify and verify customer identity?<}0{>贵机构是否对客户进行尽职调查，和强化尽职调查工作的程序以识别并确认客户身份？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 16.{0>Do you undertake customer due diligence, including:<}0{>贵机构是否对客户进行尽职调查，包括：<0}{0>(a) Verification of the identify of:<}0{>(a)对：<0}(i)对客户身份的确认，以及<0}(ii)实际控制客户的自然人与交易的实际受益人的身份确认；以及<0}(b)充分了解客户的财务情况和业务情况以对交易的合理性以及交易所涉及资金的来源的合法性进行评估。<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 17.贵机构是否有客户风险评分机制？ | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 18.请描述贵机构上述客户风险评分机制的流程及方法（若空间不足可添加附件） |  |
| 19.{0>Does your institution apply enhanced due diligence policies and procedures in connection with higher risk customers?<}0{>贵机构是否对高风险客户制订加强版尽职调查工作政策、制度和流程？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ] 否<0} |
| 20.{0>Does your institution pay attention to high risk customers, including politically exposed persons, correspondent banking relationships and customers from high risk countries?<}0{>贵机构是否关注高风险客户，包括政治公众人物、来自高风险国家的客户？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 21.{0>Does your institution have a process to review and, where appropriate, update customer information relating to high risk client information?<}0{>贵机构是否有相关程序以审查并更新（在适当的情况下）客户信息？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ] 否<0} |
| 22.{0>Does your institution ensure that effective anti-money laundering and anti-terrorist controls are in place on new technologies, and when you are dealing in non-face to face interactions or through intermediaries?<}0{>在进行非面对面或通过中介机构进行业务合作时，贵机构是否确保有效的反洗钱和反恐怖融资防控措施已通过新技术落实到位？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ] 否<0} |

## 四、交易监控与报告

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| 23.{0>Does your institution monitor customer accounts and transactions in order to detect suspicious activities?<}0{>贵机构是否对客户账户和交易进行监控以发现可疑的交易活动？<0} | [ ] ✓ {0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 1. {0>过程是人工还是自动进行的？<0}
 | 人工和自动 |
| 1. {0>What types of transactions do you monitor (e.g. large value transactions, cash withdrawals, cash deposits)?<}0{>{0>What types of transactions do you monitor (e.g. large value transactions, cash withdrawals, cash deposits)?<}0{>贵机构监控了哪类交易？<0}
 | 汇款 |
| 24.{0>Is there an established method of reporting suspicious activities and transactions to the appropriate authorities?<}0{>是否已制定了向相关当局报告可疑活动和交易的办法？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 25.{0>Does your institution have an established program that includes policies and procedures that include a process (manual or automated) to periodically review customer accounts for large or unusual transaction?<}0{>贵机构是否制订了包括对客户账户的大额交易和异常交易进行定期审查的政策和操作规程的程序（人工或自动）？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 26.在过去一年中，贵机构是否向监管机关报告了可疑交易报告？ | [ ]  {0>Yes [ ]  No<}100{>是 [ ]  [ ] ✓否 |

## {0><}0{>五、<0}制裁项下的合规安排

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| --- | --- |
| 27.贵机构对客户及交易是否有制裁筛选机制GUIJIGOU？<0}{0>If yes, who receives training and how frequently?<}0{><0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 28.上述系统包括上述系统包括哪些制裁名单？ |  |
| 29.{0>Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?<}0{>贵机构是否拥有制裁筛选IT系统？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |

## 六、反洗钱培训与其他{0> <}0{>

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| 30.贵机构是否设立了预防洗钱交易的员工培训项目以帮助员工识别可疑交易活动？<0} {0>If yes, who receives training and how frequently?<}0{>若是，培训对象是谁？多久培训一次？<0} | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |
| 31.{0>Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?<}0{>贵机构是否向相关员工传达了反洗钱相关的新法规或对现有政策和操作规程的变更？ | [ ]  ✓{0>Yes [ ]  No<}100{>是 [ ]  [ ] 否<0} |

**反洗钱专员信息：**

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| **{0>Name:<}100{>姓名：<0}** | Ada Wong |  |
| **部门：** | 法规部 |  |
| {0><}100{>职位：<0} | 法规部主管 |  |
| {0><}89{>地址：<0} | 香港数码港100号三期E座4楼 |  |
| {0><}0{>电话：<0} | 37073089 |  |
| {0><}75{>电子邮箱：<0} | payments@vcanfintech.com |  |
| **{0>Signed<}0{>签名：<0}** |  |  |
| **{0>Date:<}0{>日期：<0}** | 01/11/2019 |  |

**填表人声明：**

**{0>I confirm that the information provided in the above Questionnaire is current, accurate and representative of the anti-money laundering and anti-terrorist financing policies and procedures that are established in my institution.<}0{>本人特此确认本调查问卷所提供的信息是我机构所制定的现在的、准确的、典型的反洗钱和反恐怖融资政策和操作规程。**

**填表人信息：<0}**

|  |  |
| --- | --- |
| **{0>Name:<}100{>姓名：<0}** | Ada Wong |
| **部门：** | 法规部 |
| {0><}100{>职位：<0} | 法规部主管 |
| {0><}89{>地址：<0} | 香港数码港100号三期E座4楼 |
| {0><}0{>电话：<0} | 37073089 |
| {0><}75{>电子邮箱：<0} | payments@vcanfintech.com |
| **{0>Signed<}0{>签名：<0}** |  |
| **{0>Date:<}0{>日期：<0}** | 01/11/2019 |