**SALESPERSON’S CHECKLIST ON CUSTOMER DUE DILIGENCE (CDD) FOR SALE AND PURCHASE TRANSACTIONS**

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| **Important points to note:**1. This checklist guides salespersons on the conduct of CDD to comply with the requirements of the Practice Guidelines on the Prevention of Money Laundering and Countering the Financing of Terrorism (PG 01-19) when undertaking estate agency work.
2. Salespersons are required to complete the checklist for the client(s) that they represent, e.g. if the salesperson represents the buyer, the salesperson is only required to complete the checklist for the buyer. Similarly, the salesperson is only required to complete the checklist for the seller if he represents the seller.
3. Salespersons are required to complete the checklist for every property transaction, and thereafter submit the completed checklists to their estate agents.
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|  | **Activity** |  **Tick (🗸)** | **Remarks (if any)** |
| **Section 1: Customer’s Particulars Form** |
| 1.1 | Salespersons are required to establish a client-agent relationship with their clients and inform their clients of the proposed terms of service. If you have not done so for this transaction, please state the reasons in the “Remarks” column. *\* Pointer: Salespersons are encouraged to use the prescribed estate agency agreement to formalise the client-agent relationship. Client-agent relationship may also be established through email or phone text messages.* |  |
| 1.2 | Ask your client to complete the **Customer’s Particulars Form (*Annex E1*)**, and verify\* the client’s identity. It is mandatory to do so. If it is not done, please state the reasons in the “Remarks” column. *\* Pointer: Verify the identity of your client by requesting to see and record details of documents such as the NRIC or passport. The customer’s particulars obtained and your encounters with your client will help you assess if there is suspicion of money laundering (ML) or terrorist financing (TF) activity.* |  |
| 1.3 | If a person purports to act on behalf of your client, verify the identity of the person and request for documents authorising the person to act on behalf of your client such as an authorisation letter or the Power of Attorney (POA). If it is not provided, do not deal with the person and consider lodging an STR if there is suspicion of ML or TF activity. If it is not done, please state the reasons in the “Remarks” column. |  |
| 1.4 | Is your client a Ministry or Department, an Organ of State or a Statutory Board of the Government of Singapore? **If your answer is “Yes” to the above question, you are not required to proceed with other Sections of this checklist. You may proceed to sign off the declaration and submit the checklist to the estate agent.****If you answer is “No”, please continue with this checklist.** | [ ]  **Yes**[ ]  **No** |  |

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|  | **Activity** |  **Tick (🗸)** | **Remarks (if any)** |
| **Section 2: Conduct of Customer Due Diligence (CDD) Measures** *[Note: In situations where the salesperson reasonably believes that conducting the below CDD measures would tip off your client, he/she should not pursue the CDD measures and he/she should lodge a Suspicious Transaction Report (STR)].*  |
| 2.1 | Beneficial Owner (BO) 1. Do you suspect that your client is not the BO\* of this property transaction?

*\* Pointer: BO is the person who has ultimate interest in the property transaction, and who has control over the client. If the BO is a company, take reasonable measures to understand the ownership and control structure of the company to identify the individual behind the company (see Section 2.2).* **If your answer is “No” to the above question, please tick (🗸) “NA” for the following question.**  | [ ]  **Yes**[ ]  **No** |  |
| 1. If your client is not the BO, are you able to verify the identify the BO?

**If your answer is “Yes”** **to the above question, please indicate the** **particulars of the BO in the “Remarks” column.**  | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |
| 2.2 | Legal Person or Legal Arrangement1. Is your client a legal person (an entity such as a company or an association) or a legal arrangement (a trust)?

**If your answer is “Yes” to the above question, please proceed with Section 2.2(b).** **If your answer is “No”, please proceed to Section 2.3.**  | [ ]  **Yes**[ ]  **No** |  |
| 1. For a client that is a legal person or legal arrangement, salesperson is to understand the ownership and control structure\* and verify the identity# of the client. If it is not done, please state the reasons in the “Remarks” column.

*\* Pointer: To understand the ownership and control structure of the client, you may rely on any of the following information but not limited to:*1. *Information provided by your client (e.g. Entity’s organisation chart);*
2. *Information available on the entity’s website or published annual reports;*
3. *Information available on the entity from public sources (e.g. annual returns and filing with Accounting and Corporate Regulatory Authority); or*
4. *Information obtained from other reliable sources (e.g. research reports, third party service providers) or other research.*

*# Pointer: You may rely on the following information (e.g. entity’s business profile from Bizfile) to verify the customer’s identity:*1. *Name and proof of existence;*
2. *The names of Directors or the most senior executive or managing official; and*
3. *The address of the registered office.*
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|  | **Activity** |  **Tick (🗸)** | **Remarks (if any)** |
|  | 1. For a client that is a legal person or legal arrangement, salesperson is to verify the identity of the beneficial owner(s) in relation to the legal person\* or legal arrangement#. If it is not done, please state the reasons in the “Remarks” column.

*\* Pointer: To verify the identity of the beneficial owner of a legal person,* 1. *Identify the natural person who has controlling interest stake of the legal person;*
2. *Where there is doubt about whether the person with controlling interest is the beneficial owner, to identify the natural person who exerts control; and.*
3. *Where such a natural person cannot be identified through (a) or (b), If this is not possible, to identify the most senior executive or managing official (e.g. the Director in a company).*

*# Pointer: To verify the identity of the beneficial owner of a legal arrangement,*1. *For trusts – identify the settlor, the trustee(s), the protector (if any), the beneficiaries or class of beneficiaries, and any natural person having ultimate ownership of the assets or undertakings of the trust, or exercising ultimate control or ultimate effective control over the trust.*
2. *For any other types of legal arrangements – identify the persons in equivalent or similar positions.*

**Consider lodging an STR if there is any suspicion of ML or TL activity (e.g. there are adverse news about the beneficial owner).**  |  |
| 2.3 | TSOFA and list provided by authorities (*including CEA’s Practice Circular (PC) on Compliance with TSOFA)*1. Screen your client or BO against the First Schedule of TSOFA\* and list provided by authorities. If it is not done, please state the reasons in the “Remarks” column.

*\* Pointer: A copy of the TSOFA can be downloaded from* [*https://sso.agc.gov.sg/Act/TSFA2002*](https://sso.agc.gov.sg/Act/TSFA2002) |  |
| 1. In the screening of your client or BO against the TSOFA and list provided by authorities, do you suspect\* your client or BO to be a designated individual or entity under the First Schedule or any list?

*\* Pointer: Salespersons may match the name, nationality, age range and passport number (if applicable) of the client against the information provided in the First Schedule and list to determine if your client or BO is a designated individual or entity under the First Schedule or list.***If your answer is “Yes” to the above question, please proceed to lodge an STR and continue with 2.3(c).** **If your answer is “No” to the above question, please tick (🗸) “NA” for 2.3(c).**  | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |
| 1. Has your client or BO obtained an Exemption Order under the TSOFA?

*\* Pointer: Salespersons may check with your EA whether an Exemption Order has been issued to your client or BO.***If you answer is “Yes” or “NA”, continue with section 2.4.****If your answer is “No”, cease all dealings with the client. You are not required to proceed with other Sections of this checklist. Please proceed to sign off the declaration and submit the checklist to the estate agent.** | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |
|  | **Activity** |  **Tick (🗸)** | **Remarks (if any)** |
| 2.4 | United Nations (UN) Sanctions Lists1. Screen your client or BO against the UN Sanctions Lists\*. It is mandatory to do so. If it is not done, please state the reasons in the “Remarks” column.

 *\* Pointer: Screening can be done on the “United Nations Security Council Sanctions List Search” webpage at* [*https://scsanctions.un.org/search/*](https://scsanctions.un.org/search/) |  |
| 1. In the screening of your client or BO against the UN Sanctions Lists, do you suspect\* your client or BO to be a designated individual or entity in the lists?

*\* Pointer: Salespersons may match the name, nationality, age range of the client against the information provided in the UN Sanctions Lists to determine if your client or BO is a designated individual or entity in the Lists.***If your answer is “Yes” to the above question, please lodge an STR and cease dealing with your client or BO. You are not required to proceed with other Sections of this checklist. Please proceed to sign off the declaration and submit the checklist to the estate agent.** | [ ]  **Yes**[ ]  **No** |  |
| 2.5 | Politically Exposed Person (PEP)1. Do you have reasons to believe that your client or BO is a PEP\*?

*\* Pointer: PEP refers to a person, whether domestic, foreign or international organisation, who is or has been entrusted with prominent public functions, e.g. government ministers, senior civil servants, senior executive of state owned corporations or senior management of international organisations, etc. Use an internet-based search engine, e.g. Google and Yahoo, to obtain news or information if you suspect your client or BO is a PEP.* **If your answer is “No” to the above question, please tick (🗸) “NA” for the following question.**  | [ ]  **Yes**[ ]  **No** |  |
| 1. If your client or BO is a PEP, is your client or BO a foreign PEP\*, a family member\* or close associate\* of a foreign PEP?

*\* Pointer: A foreign PEP refers to a person who is or has been entrusted with prominent public functions by a foreign country. Family member means a parent, step-parent, child, step-child, adopted child, spouse, sibling, step-sibling and adopted sibling of the PEP. Close associate means an individual who is closely connected to a PEP, either socially or professionally.* **If your answer is “Yes” to the above question, ask for the source of the PEP’s funds/wealth and to seek approval from your estate agent whether to continue with the** **property transaction. Indicate the source of funds/wealth and the decision of your estate agent in the “Remarks” column.**  | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |

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|  | **Activity** |  **Tick (🗸)** | **Remarks (if any)** |
| 2.6 | Higher Risk Areas 1. Is the property transaction complex\*, or unusually large\*?

*\* Pointer: Complex transactions could include attempts to disguise the BO involved in the transaction, or unnecessarily complex transaction structure possibly designed to obscure the true nature of the transaction, or multiple intermediaries used for the transaction. Unusually large transactions could include transaction priced at more than the usual or expected amount for a similar typical transaction.*  | [ ]  **Yes**[ ]  **No** |  |
| 1. Does the property transaction have no apparent economic\* or lawful purpose\*?

*\* Pointer: Transactions with no apparent economic or lawful purpose could include using trust and company service providers to set up a number of corporate structures in multiple countries for the transaction without any apparent purpose.* | [ ]  **Yes**[ ]  **No** |  |
| 1. Is your client or BO from higher risk countries\*?

*\* Pointer: The links to the list of higher risk countries can be found at the Financial Action Task Force’s (FATF) webpage at* [*http://www.fatf-gafi.org/countries/#high-risk*](http://www.fatf-gafi.org/countries/#high-risk) | [ ]  **Yes**[ ]  **No** |  |
| **If your answer is “Yes” to one or more of the above questions in Section 2.6, your transaction may be of higher risk. Please proceed to complete Section 2.7.** **If your answers are “No” to all of the above questions in Section 2.6, please tick (🗸) “NA” for the questions in Section 2.7.**  |
| 2.7 | Enhanced CDD1. As the property transaction may be of higher risk, have you conducted enhanced CDD measures by asking the following information from your client or BO, i.e. occupation, source of funds/wealth and purpose of the transaction.

**If your answer is “Yes” to the above question, please indicate the findings in the “Remarks” column.** | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |
| 1. Have you sought approval from your estate agent to continue with the property transaction?

**If your answer is “Yes” to the above question, please indicate the decision of your estate agent in the “Remarks” column.**  | [ ]  **Yes**[ ]  **No**[ ]  **NA** |  |

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| **Reminder: Suspicious Transaction Report (STR)***[Note: If in the course of carrying out estate agency work, any estate agent or salesperson suspects or has reason to believe that any property and/or property transaction (or proposed transaction) may be connected to money laundering or financing of terrorism, estate agents and salespersons must lodge an STR through the STRO Online Notices And Reporting (SONAR) platform in accordance with the law. Salespersons who intend to lodge STRs will need to file them through their estate agents via the estate agent’s CorpPass account. STRO’s guidance on the completion of the STR Form is available on* [*https://www.police.gov.sg/sonar*](https://www.police.gov.sg/sonar)*]*In your conduct of CDD for this property transaction, consider lodging an STR when: 1. You face difficulty in completing CDD, e.g. your client is uncooperative such as refusing to provide information or attempting to hide information;
2. There is indication of your client or BO (including family member or close associates of your client or BO who is a foreign PEP) known to be involved or linked with ML/TF activity;
3. You reasonably believe that conducting CDD will tip off your client; or
4. There is suspicion of ML/TF activity, such as the following (you may refer to the full list of indicators in **Annex C** of PG 01-19):
* There is adverse news concerning your client / BO in the media.
* Your client is hesitant or declines to put his/her name on any document that would connect him/her with the property.
* Your client attempts to hide the identity of the true client.
* Your client is willing to pay a higher price and is willing to transact without inspecting the property.
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| **Salesperson’s Declaration: I declare that the above information filled-in are true and correct to the best of my knowledge.** |
| Name of Client(s): |  |
| Identity of Client(s):(NRIC/Passport No./Other ID) |  |
| Tick (**🗸**) Type of Client/s: | [ ]  **Seller** [ ]  **Buyer** |
| Name & Licence No. of Estate Agent: | **Shinoken & Hecks Pte Ltd** License Nr L3007688F |
| Name & Registration No. of Salesperson: |  |
| Date of Completing Checklist: |  |
| Date of Submitting to Estate Agent: |  |
| Signature of Salesperson: |  |

**Customer’s Particulars Form**

**Important:**

**Pursuant to Practice Guidelines PG 01-19 [read in conjunction with the Estate Agents (Estate Agency Work) Regulations 2010, a subsidiary legislation under the Estate Agents Act 2010], estate agents and salespersons are required to obtain their customer’s particulars for every property transaction, as part of the measures to prevent money laundering and financing of terrorism.**

Salespersons are to ask their customer(s) whom they represent to complete this form, and thereafter submit the completed form to their estate agents.

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| **Customer’s Particulars {for individuals}** |
| Name: |  |
| NRIC/Passport No./Other ID: |  |
| Date of Birth: |  |
| Nationality: |  |
| Occupation: |  |
| Name of Beneficial Owner: (if individual is not the true owner) |  |
| **Customer’s Particulars {for legal persons (e.g. Government organisations, company, corporations or associations) and legal arrangements (e.g. a trust)}** |
| Name: |  |
| Country of Registration: |  |
| Registration Number: |  |
| Registration Date: |  |
| Main Business Activity: |  |
| Name of Beneficial Owner: (if entity is not the true owner) |  |
| **Acknowledgement** |
| Date of Completing Form: |  |
| Address of Property in the Transaction: |  |
| Signature of Customer:  |  |