Risk Assessment

**Case Reference:**

199303093K

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**CLIENT'S RISK FACTORS**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | | | | |
| Is this a NEW customer/client? | □ | Yes | □ | No |
| The customer/client is a public company listed on any stock exchange NOT subjected to | □ | Yes | □ | No |
| disclosure requirements. |  |  |  |  |
| Is the customer/client a legal person or an entity that can hold assets in its own name? | □ | Yes | □ | No |
| Does the customer/client use nominee director(s) or shareholder(s)? | □ | Yes | □ | No |
| Where applicable, do the nominee shareholders represent majority ownership? | □ | Yes | □ | No |
| Does the ownership structure of the customer/client appear unusual or excessively | □ | Yes | □ | No |
| complex given the nature of its business? |  |  |
| Is the customer/client’s business cash-intensive? | □ | Yes | □ | No |
| Does the customer/client frequently make unaccounted cash transactions to similar | □ | Yes | □ | No |
| recipient(s)? |  |  |  |  |
| Do the proposed directors/partners/shareholders have prior criminal convictions involving | □ | Yes | □ | No |
| fraud or dishonesty? |  |  |  |  |
| Is any of the customer/client, beneficial owner or its agent a politically exposed person? | □ | Yes | □ | No |
| Are the customer/client’s company accounts outdated? | □ | Yes | □ | No |
| Do the customer/client’s shareholders and/or directors frequently change, and the changes | □ | Yes | □ | No |
| are NOT within reason? |  |  |
| Is there any problem obtaining the required information in the relevant form? | □ | Yes | □ | No |
| Can the information obtained be verified by independant and reliable sources? | □ | Yes | □ | No |
| Is the customer/client a charitable or non-profit organisation that is not registered in | □ | Yes | □ | No |
| Singapore (<http://www.charities.gov.sg>)? |  |  |
| Does the client appear to be a shell company? | □ | Yes | □ | No |

□

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Is the client in a high-risk industry (as determined by the firm, such as with reference to publications and guidance issued from time to time by the FATF)?

Yes

No

The professional firm has performed further screening of details of customer/client, beneficial owner of the customer/client, person acting on behalf of the customer/client, or connected party of the customer/client against SentroWeb. Are there adverse news or information arising?

Yes

No

Exceptions noted, from details of the customer/client,beneficial owner of the customer/client, person acting on behalf of the customer/client, or connected party of the customer/client, cannot be disposed of satisfactorily.

Yes

No

**COUNTRY RISK FACTORS**

Is the customer/client connected to or transacting with a country or a territory that is identified as not having adequate anti-money laundering or counter financing terrorism measures?

Yes

No

Is the customer/client connected to or transacting with a country or a territory that is identified to be funding or supporting terrorist activities or that have designated terrorist organisations operating within their territories?

Yes

No

Are there unusual patterns of transactions that have no apparent economic purpose or cash payments that are large in amount, in which disbursement would have been normally made by other modes of payment (such as cheque, bank drafts etc.)?

Yes

No

Are there unaccounted payments received from unknown or un-associated third parties for services and/or transactions provided by the customer/client?

Yes

No

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**SERVICES RISK FACTORS**

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| --- | --- | --- | --- | --- |
| Is the customer/client connected to or transacting with a country or a territory that have | □ | Yes | □ | No |
| dealings with high risk jurisdiction? |  |  |
| Is the customer/client connected to or transacting with a country or a territory that is | □ | Yes | □ | No |
| sanctioned by a regulatory body, such as the United Nations (UN)? |  |  |

□

□

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Is the customer/client connected to or transacting with a country or a territory in relation to | □ | Yes | □ | No |
| which the FATF has called for countermeasures? |  |  |
|  | | | | |
| Has the customer/client given any instruction to perform a transaction (which may include | □ | Yes | □ | No |
| cash) anonymously? |  |  |
| Has the customer/client transferred any funds without the provision of underlying services | □ | Yes | □ | No |
| or transactions? |  |  |

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Is there instruction from the customer/client to incorporate shell companies with nominee shareholder(s) and/or director(s)?

Yes

No

Does the customer/client purchase companies or business entities that have no obvious commercial purpose? This would include: (a) Multi-layer, multi-country and complex group structures. (b) Setting up entities in Singapore where there is no obvious commercial purpose, or any other personal or economic connection to the client.

Yes

No

**Please provide supporting information**

-

-

**Customer Risk Rating**

Low

Medium

High

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| --- | --- | --- | --- | --- |
| Is this business relationship being established without any physical meeting? | □ | Yes | □ | No |
| Are there any transactions being performed without any physical meeting? | □ | Yes | □ | No |
| Are the transactions required by the customer/client inconsistent with the professional | □ | Yes | □ | No |
| intermediaries' knowledge on the customer/client's risk profile and nature of business? |  |  |

□

□

□

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**Recommendation for acceptance of customer**

Recommended

Not Recommended

**Signature:**

**Name of recommending officer:**

Lee Kien Boon

**Date**

**Approval for Acceptance of Customer**

Approved

Not Approved

**Signature:**

**Name of approving officer:**

Lee KB

**Date**

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