

## Payments - Anti Money Laundering

**GUIDE.SUMMARY** With eBay processing payments, we are responsible for reporting suspicious activity on the site. Specifically, teammates need to be aware of what money laundering looks like on the site and report it when they notice unusual activity. The AML Compliance department is required to fill out a Suspicious Activity Report (SAR) when potentially illegal behavior is identified. We are not required to prove that the activity is suspicious, however we are required to report it. This guide contains:

- Definition of money laundering
- Talking points for seller contacts on information requests
- Teammate and team lead workflows for AML and AML-related payout blocks

What is money laundering? Money laundering is defined as structured financial transactions whose purpose is to conceal the source or destination of illegally gained money in order to legitimize it -

<https://cskb.qa.ebay.com/cskbapp/art?page=content&id=GUIDE1245>

GUIDE1245. Money laundering consists of the following steps:

- Collection of illegally gained money.
- Placement in legitimate financial system.
- Layering through bookkeeping and a series of transactions to conceal the money.
- Integration by being withdrawn from a legitimate account to be used as intended by the criminals.

Internal Information What would money laundering look like on eBay?

Examples:

- Circular movement of funds: PayPal accounts used by buyer and seller linked to the same third party account
- Illegitimate shipping addresses: multiple fake shipping addresses and no INRs
- Similar/shared IP addresses between buyers and sellers
- Unusual buyer registration practices: trend of new buyer accounts being created on what appears to be a schedule with similar trends
- Employment fraud see

<https://cskb.qa.ebay.com/cskbapp/art?page=content&id=GUIDE1454>

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- Red flags to watch out for:

- Members with multiple accounts for no legitimate purpose
- Abrupt change in buying/selling activity

<li>Member not cooperating with contact verification flow e.g. refusing to provide their user ID</li> <li>Member uncooperative with requests to provide additional documentation for verification purposes</li> <li>Other strange activity with no reasonable explanation, such as same buyer ID purchases high quantity of same item with excessive frequency</li> <li>Unreasonably high priced items</li> </ul> Report suspected money laundering through the link below if you come across these red flags. Categories to be mindful of include electronics, brand name or luxury goods, and collectibles. <a href="https://ociplatform--c.na91.visual.force.com/apex/FORMS\_GenericForm?formid=a2l2E000001d3CvQAI&showHeader=true" target="\_blank">https://ociplatform--c.na91.visual.force.com/apex/FORMS\_GenericForm?formid=a2l2E000001d3CvQAI&showHeader=true</a>

</h2><h2>GUIDE.RELATED\_LINKS </ul> <li><a href="https://cskb.vip.ebay.com/csKBapp/art?page=content&id=GUIDE1464">GUIDE 1464 Global Sanction Screening</a></li> <a href="https://cskb.vip.ebay.com/csKBapp/art?page=content&id=GUIDE1454">GUIDE 1454 Employment Fraud</a></li> <a href="https://cskb.vip.ebay.com/csKBapp/art?page=content&id=GUIDE1245">GUIDE 1245 Criminal & Regulatory Investigations (CRI) - Law enforcement contacts or reports of crime</a></li> </ul> </h2><h2>GUIDE.TALKING\_POINTS

</h2><h3>Talking points for seller contacts on information requests</h3> Internal Information Do not share this information with sellers. All of the information below is internal, and for your personal understanding only. Sellers may contact eBay customer service to find out more details about a request for information from Financial Intelligence Unit (FIU), Enhanced Due Diligence (EDD) or Transaction Monitoring (TM). Issues that indicate AML: 667, 668, 669, 674, 684, 710, 711, 714, 719, 720, 724, 1159. <ul> <li>Issue 667 is a request for information (RFI) (US)</li> <li>Issue 668 is RFI + payout block (US)</li> <li>Issue 669 is KYC

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restriction (US)</li> </li>Issue 710 is RFI + payout block (Lux)</li> </li>Issue 1159 is SIP + selling restriction (US)</li> </ul> Please<nbsp>note:<nbsp>DO NOT mention compliance screening, or money laundering<nbsp>to the member. This is internal information and not to be shared. (US only) For more details about Issue 1159, please see <a href="https://cskb.vip.ebay.com/cskbapp/art?page=content&id=GUIDE1464&viewlocale=en\_US">Global Screening Guide (Sanctions, PEP and SIP)</a>. There are different timelines for<nbsp>the<nbsp>4 process related to anti-money laundering: <ul> <li>Transaction Monitoring (TM) -<nbsp>requires<nbsp>member submit the requested information</li> <li>Financial Intelligence Unit (FIU) - requires member submits requested information and/or documentation, and if not received within 5 business days of the initial request, a restriction will be placed on their account</li> <li>Enhanced Due Diligence (EDD)<nbsp>- requires member to submit proof of identity or other requested information, within 30 days of the initial request. If they fail to do so, a restriction will be placed on their account</li> </ul> <nbsp> The talking points below should be used to address member contacts. Why do I need to provide documentation as part of signing up as a seller? We are required to collect this information to comply with government regulations. This will also help us set up your account for payments. We use this documentation to verify your identity and your business, which ensures eBay stays a trusted marketplace. Why does eBay need this information? eBay must identify our members to ensure that we remain compliant with government regulations. In the interest of maintaining a safe trading environment, from time to time we ask members to verify contact information before they're allowed to continue buying or selling on the site. When will my payouts resume? Payouts will resume after you resolve your suspension, restriction or account hold. What will you do with this information? We'll review your account against the information provided. What will happen if I don't provide this information? For TM process: Accounts may become subject to restriction if we cannot verify account information. For FIU process: Accounts may remain restricted or suspended if we cannot verify account information. For EDD process: Accounts will remain restricted or suspended if we

cannot verify account information. With respect to the Digital Services Act, B2C sellers in the European Union or doing CBT in the European Union, will be given one opportunity to appeal certain suspensions. Why is my account restricted? For TM process: N/A For FIU/EDD process: eBay has identified activity on your account that is potentially contrary to eBay policy. We don't have adequate information that allows us to remove your account restriction at this time. How do I upload the documents? 

- Click on the link in the email sent to you. (<https://ocswf.ebay.com/mudcwf?deptName=PIR>)
- Sign in using your eBay user ID and password.
- Select the Document Type from the drop-down list.
- Locate the document(s) to be uploaded.
- Select Send and wait for the confirmation to appear to ensure your documents have been submitted for review.
- Please note: It may take up to 3 business days to review your information.

 We appreciate your cooperation in resolving this matter as quickly as possible and look forward to receiving your documentation. I'm experiencing issues with uploading my documents Or The document uploader link is not working correctly. If you're encountering errors on the document upload page, please check all of the following: 

- Are your documents in the file formats that we support?
- Are your documents within the size limit (20 MB)?
- Did you select a "document type" for each file?

 If you forgot to factor in any of these requirements, you'll see an error and get bumped back to the beginning of the process. You can send your documents to us in the following file formats: \*.gif, \*.jpg, \*.png, or pdf. For security reasons, we do not accept any other formats or aggregated (compressed) or executable files. The total size of the documents cannot be greater than 20 megabytes (MB). A single file cannot be larger than 2 MB. Internal Information We've heard that many members have had problems with using these document upload links. Almost all of these issues are caused by user error - please check that all of the tool requirements have been met. If you're sure that the member has followed all steps correctly, then file a

MyIT&nbsp;report to have the issue investigated. Can you check if you have received my documents/response? &lt;br&gt; Please give me a few minutes while I verify if we have received your documents/response.&lt;br&gt; Yes/No, we have/haven't received your documents/response. Internal Information CS to verify by reviewing MAC Notes to confirm if documents have been received in the &lt;a href="https://cskb.qa.ebay.com/csKBapp/art?page=content&id=GUIDE1464&actp=search&viewlocale=en\_US&answerid=16777216&uniqueid=16777216:12584740&searchid=2&curPage=art&prevPage=srp#Reviewinstruction"&gt;Billing Hub Case Management Tool&lt;/a&gt;. Can you review the documents/information I've already sent in? We're unable to review your documents/information on this call. Your documentation/response will be under review by a dedicated team of specialists and it may take up to 3 business days. Can you provide the phone number or transfer me to the team that reviews the documents/response? Our current team of specialists do not offer phone support at this time. However, your documentation/response will be reviewed within 3 business days. Can I give the information over the phone? Unfortunately, we are unable to accept sensitive information over the phone. Please login to your eBay account and provide the documents on site. I don't want to upload any documents Or Why do I have to provide the requested&nbsp;documents/information? When you registered your eBay account, you agreed to eBay policies as well as the User Agreement. In this user agreement we define the usage of our services and that we may collect additional information in order to authenticate or verify contact information by requesting proof of identity or proof of ownership, etc. &lt;ul&gt; &lt;li&gt;&lt;a href="http://pages.ebay.com/help/policies/user-agreement.html"&gt;eBay User Agreement&lt;/a&gt;&lt;/li&gt; &lt;li&gt;&lt;a href="http://pages.ebay.com/help/policies/privacy-policy.html"&gt;eBay User Privacy Notice&lt;/a&gt;&lt;/li&gt; &lt;/ul&gt; I provided you with my ID/identity documents to get my payout reinstated. Cant you just use that?&nbsp;&lt;br&gt; &lt;br&gt; Or&lt;br&gt; &lt;br&gt; I have already provided you with my ID/identity documents to get reinstated, why do I have to do it again? We've

reviewed your previously submitted documents and will need the additional up-to-date documentation requested in the email communication you received. Internal Information We'll be looking for documents that have been submitted here prior to reaching out, if we can utilize them we will. I've already provided you my ID/identity documents to get reinstated, why do I have to do it again? We've reviewed your previously submitted documents and will need additional up-to-date documentation that is being requested in the email communication you received. Internal Information We'll be reviewing prior communication and available documents before sending requests for information or documentation. If an additional request has been sent, we will need the additional documentation that is being requested. It has been over 3 days since I submitted my documentation. Why hasn't this been resolved? In rare cases, due to a spike in activity, we may require additional time to review documentation. We do strive to complete reviews as quickly as possible to resolve any outstanding issues. Member refuses to provide information TM process: Unfortunately, your account may become subject to restriction if we cannot verify account information. We hope to continue to do business with you soon. FIU/EDD process: Unfortunately, until you provide the requested documents your account may be restricted or suspended. We hope to continue to do business with you soon. Can I create another account? TM process: We would prefer to address any questions with your current account. FIU/EDD process: You're prohibited from registering new accounts, selling, buying, and communicating with other eBay members until your account has been reinstated. Can I update my account registration information? FIU/EDD process: No, you may not update your account registration contact information until your account has been reinstated. Can you help me understand and resolve other issues on my account? Internal Information If Customer Service can educate and/or help resolve other issues on the members account, then proceed to help the member per standard CS eBay policy. Can you close my account for me? Internal Information CS to follow standard policy on account closures for your region.