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主旨: 檢送地政士及不動產經紀業洗錢及資恐風險評估結果分

析1份供參,請轉知所屬會員及其從業人員應注意可能面

臨風險,並落實防制洗錢及打擊資恐工作,請查照。

說明: 依據本部106年11月22日內授中辦地字第1061307603號函

訂頒「地政士及不動產經紀業防制洗錢及打擊資恐之宣導

輔導及風險評估實施計畫」續辦。

正本: 中華民國地政士公會全國聯合會、中華民國不動產仲介經紀商業同業公會全國聯合會、中華民國不動產代銷經紀商業同業公會全國聯合會

副本: 本部地政司【不動產交易科】

# 地政士及不動產經紀業洗錢及資恐風險評估結果分析

#### 壹、背景說明

按洗錢防制法第 5 條第 3 項第 2 款規定,將地政士及不動產經紀業從事與不動產買賣交易有關之行為納入該法指定之非金融事業或人員。又同法第 7 條第 1 項規定,金融機構及指定之非金融事業或人員應進行確認客戶身分程序,並留存其確認客戶身分程序所得資料;其確認客戶身分程序應以風險為基礎,並應包括實質受益人之審查,爰為了解地政士及不動產經紀業所面臨洗錢及資恐風險,提供其進行防制洗錢及打擊資恐工作依循及內政部研擬相關監理措施參考,內政部於 106 年 11 月 17 日邀集中華民國地政士公會、不動產仲介經紀商業同業公會、不動產代銷經紀商業同業公會等全國聯合會及各直轄市、縣(市)政府研商「地政士及不動產經紀業防制洗錢及打擊資恐之宣導輔導及風險評估實施計畫」草案,嗣於 106 年 11 月 22 日以內授中辦地字第 1061307603 號函送該實施計畫予與會機關、團體,並請各直轄市、縣(市)政府協助發放輔導單及風險評估表予地政士及不動產經紀業,以及彙整風險評估表之數據。

本案風險評估,係針對地政士及不動產經紀業之地理風險、客戶風險及交易風險等進行評估,並細分為8個評估項目,其中第1項及第7項評估項目在地政士及不動產經紀業略有不同,每個項目評分依風險高低分為低1分、中2分、高3分及非常高4分(如表1及附錄1、2),由受訪地政士及不動產經紀業自行評估、填寫後,由各直轄市、縣(市)政府記錄並報送內政部彙整,地政士計回收342份;不動產經紀業回收334份(如表2)。

表 1. 地政士及不動產經紀業風險評估項目

| 業別<br>DNFPBs           | 地理風險<br>Geographical Risk   | 客戶風險<br>Customer risks   | 交易風險<br>Transaction risk  |
|------------------------|---|--|---|
| 地政士<br>L. D. A.        | A1. 業務活動範圍 Business activity scope A2. 是否涉及高風險國家或地區之不動產 Whether there is involvement in real estate from high-risk countries or regions A3. 客戶資金主要來源及去向 Main customer funding source and flow | A4. 客戶國籍 Customer<br>nationality<br>A5. 客戶身分類型 Customer<br>identity type<br>A6. 客戶的地緣關係<br>Customer geographic<br>relationship | A7. 受託之不動產交易類型 Transaction type for entrusted real estate properties A8. 涉及現金支付程度 Degree of involvement in cash payment |
| 不動產<br>經紀業<br>R. E. B. | A1. 仲介或代銷業務活動範圍 Business activity scope of agencies or sales representative  A2. 是否涉及高風險國家或地區之不動產 Whether there is  |  | 類型 Transaction type<br>for real estate<br>properties in main<br>operations  |

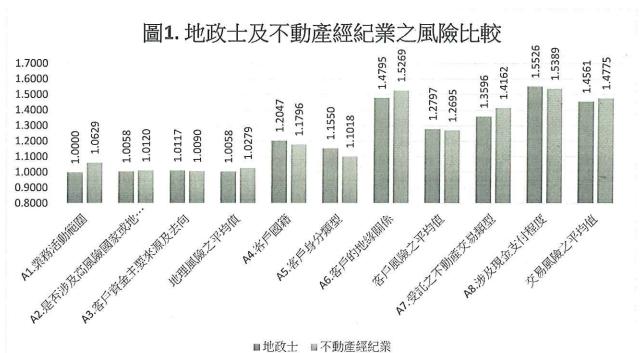
| involvement in real estate  | relationship | Degree of involvement |
|-----------------------------|--------------|-----------------------|
| from high-risk countries or |              | in cash payment       |
| regions                     |              |                       |
| A3. 客戶資金主要來源及去向 Main        |              |                       |
| customer funding source and |              |                       |
| flow                        |              |                       |

表 2. 風險評估表之回收數量統計表

| 區域別  | 地政士 | 不動產經紀業 |
|------|-----|--------|
| 新北市  | 31  | 35     |
| 台北市  | 31  | 37     |
| 桃園市  | 39  | 30     |
| 台中市  | 30  | 30     |
| 台南市  | 38  | 30     |
| 高雄市  | 30  | 30     |
| 六直轄市 | 199 | 192    |
| 各縣市  | 143 | 142    |
| 全國   | 342 | 334    |

### 貳、整體分析

整體而言,經計算各項目的風險平均值,不論是地政士或不動產經紀業,均 認為所面臨之地理、客戶及交易等 3 項洗錢及資恐風險,以交易風險最高(地政 士1.4561;不動產經紀業1.4775),且以「涉及現金支付程度」項目最高;其次 依序為客戶風險及地理風險(如表3)。



就個別評估項目觀之,地政士及不動產經紀業所面臨洗錢及資恐風險較高前三名為「涉及現金支付程度」、「客戶的地緣關係」及「受託之不動產交易類型」 (如圖 1),主要是因為國內不動產買賣交易,部分當事人仍有使用現金支付全部或部分價金之情形,客戶可能來自其他縣市,及不動產交易類似不限於住宅使用。

| 表 3. | 地政士及不 | 動產經紀業學 | 整體洗錢及 | 資恐風險表 |
|------|-------|--------|-------|-------|
|------|-------|--------|-------|-------|

| 業別                     |         | 地理         | 風險                |                           |         | 客戶      | 風險      |         |         | 交易風險    | 슍          |
|------------------------|---------|------------|-------------------|---------------------------|---------|---------|---------|---------|---------|---------|------------|
| 地政士<br>評估<br>項目        |         | 是否涉<br>及高風 | 客户 金宝 來 去 內 去 內   | 地理風<br>險之平<br>均值          |         |         | 1       |         | 受託之     | 金支付     | 交易風 险之平 均值 |
| 地政士<br>之<br>風險值        | 1.0000  | 1. 0058    | 1. 0117           | 1. 0058                   | 1. 2047 | 1. 1550 | 1. 4795 | 1. 2797 | 1.3596  | 1, 5526 | 1, 4561    |
| 不動產                    |         | 是否涉<br>及高風 | 客户資<br>金主要<br>來源及 | Carlo and Carlo and Carlo |         | 客戶身     |         |         | 主要經     | 金支付     | 交易風        |
| 不動產<br>經紀之<br>之<br>風險值 | 1. 0629 | 1. 0120    | 1. 0090           | 1. 0279                   | 1. 1796 | 1. 1018 | 1. 5269 | 1. 2695 | 1. 4162 | 1. 5389 | 1.4775     |

### 貳、區域分析

為了解都會區與一般城市有無風險差異,及都會區彼此有無風險差異,將統計資料區分為各直轄市、六直轄市(都會區)、各縣市(一般城市)及全國加以比較。從各風險項目分析直轄市與縣市主要差異,在地政士之「客戶國籍」項目,直轄市風險值明顯高於縣市,可推估直轄市的地政士較縣市易接觸到外籍客戶;在不動產經紀業之「客戶的地緣關係」項目,直轄市風險值略低於縣市,似乎直轄市不動產經紀業認為客戶為鄰近地區的程度較高,而縣市不動產經紀業則認為客戶有一定程度來自非鄰近地區。整體而言,六直轄市(都會區)之風險高於各縣市(一般城市)。

其次,將以地理風險、客戶風險及交易風險,分析是否區域性的差異存在。

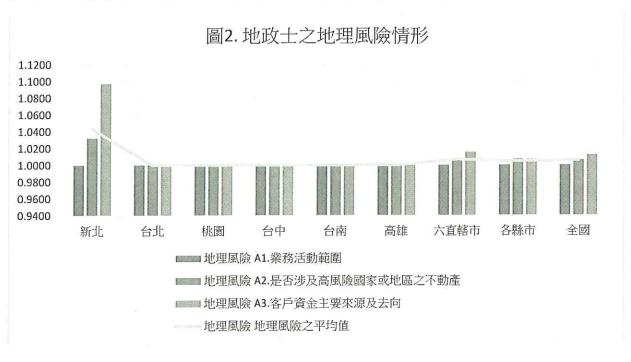
表 4. 地政士及不動產經紀業區域性洗錢及資恐風險表

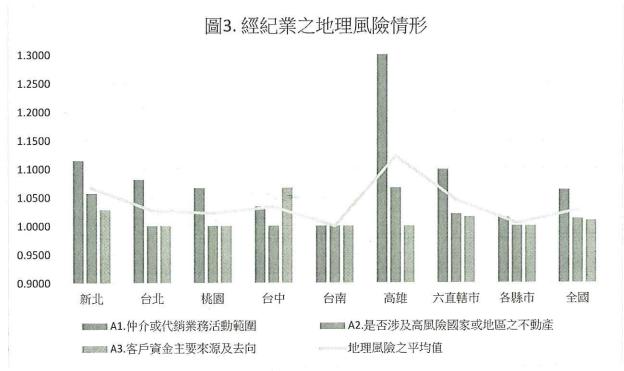
|       |        | 地理     | !風險    | à à    |        | 客戶     | 風險     |        |        | 交易風險   | <del></del> |
|-------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|-------------|
|       | A1.業務  | A2.是否  | A3.客戶  | 地理風    | A4.客戶  | A5.客戶  | A6.客戶  | 客戶風    | A7.受託  | A8.涉及  | 交易風         |
|       | 活動範    | 涉及高    | 資金主    | 險之平    | 國籍     | 身分類    | 的地緣    | 險之平    | 之不動    | 現金支    | 險之平         |
| 地區    | 童      | 風險國    | 要來源    | 均值     |        | 型      | 關係     | 均值     | 產交易    | 付程度    | 均值          |
|       |        | 家或地    | 及去向    |        |        |        |        |        | 類型     |        | -           |
|       |        | 區之不    |        |        |        |        |        |        |        |        |             |
|       |        | 動產     |        |        |        |        |        |        |        |        |             |
| 新北    | 1.0000 | 1.0323 | 1.0968 | 1.0430 | 1.2903 | 1.1613 | 1.5161 | 1.3226 | 1.4839 | 1.5161 | 1.5000      |
| 台北    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.2581 | 1.0968 | 1.5161 | 1.2903 | 1.3548 | 1.5484 | 1.4516      |
| 桃園    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.1026 | 1.0513 | 1.3077 | 1.1538 | 1.3077 | 1.3590 | 1.3333      |
| 台中    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.7667 | 1.8000 | 1.9333 | 1.8333 | 1.9333 | 1.9333 | 1.9333      |
| 台南    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.0789 | 1.0263 | 1.3947 | 1.1667 | 1.2368 | 1.4211 | 1.3289      |
| 高雄    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.2667 | 1.0667 | 1.1667 | 1.1667 | 1.2667 | 1.4667 | 1.3667      |
| 六直轄市  | 1.0000 | 1.0050 | 1.0151 | 1.0067 | 1.2764 | 1.1859 | 1.4623 | 1.3082 | 1.4171 | 1.5276 | 1.4724      |
| 各縣市   | 1.0000 | 1.0070 | 1.0070 | 1.0047 | 1.1049 | 1.1119 | 1.5035 | 1.2401 | 1.2797 | 1.5874 | 1.4336      |
| 全國    | 1.0000 | 1.0058 | 1.0117 | 1.0058 | 1.2047 | 1.1550 | 1.4795 | 1.2797 | 1.3596 | 1.5526 | 1.4561      |
|       | A1.仲介  | A2.是否  | A3.客戶  | 地理風    | A4.客戶  | A5.客戶  | A6.客戶  | 客戶風    | A7.主要  | A8.涉及  | 交易風         |
|       | 或代銷    | 涉及高    | 資金主    | 險之平    | 國籍     | 身分類    | 的地緣    | 險之平    | 經營之    | 現金支    | 險之平         |
| 地區    | 業務活    | 風險國    | 要來源    | 均值     |        | 型      | 關係     | 均值     | 不動產    | 付程度    | 均值          |
| 70 EE | 動範圍    | 家或地    | 及去向    |        |        |        |        |        | 交易類    |        |             |
|       |        | 區之不    |        |        |        |        |        |        | 型      |        |             |
| y     |        | 動產     |        |        |        |        |        |        |        |        |             |
| 新北    | 1.1143 | 1.0571 | 1.0286 | 1.0667 | 1.2286 | 1.0857 | 1.6286 | 1.3143 | 1.4857 | 1.4857 | 1.4857      |
| 台北    | 1.0811 | 1.0000 | 1.0000 | 1.0270 | 1.0541 | 1.0000 | 1.3514 | 1.1351 | 1.8108 | 1.8108 | 1.8108      |
| 桃園    | 1.0667 | 1.0000 | 1.0000 | 1.0222 | 1.1333 | 1.0667 | 1.3667 | 1.1889 | 1.2000 | 1.5000 | 1.3500      |
| 台中    | 1.0333 | 1.0000 | 1.0667 | 1.0333 | 1.4000 | 1.2667 | 1.6333 | 1.4333 | 1.4667 | 1.6000 | 1.5333      |
| 台南    | 1.0000 | 1.0000 | 1.0000 | 1.0000 | 1.0667 | 1.0333 | 1.4000 | 1.1667 | 1.0667 | 1.5333 | 1.3000      |
| 高雄    | 1.3000 | 1.0667 | 1.0000 | 1.1222 | 1.1667 | 1.1000 | 1.4333 | 1.2333 | 1.3333 | 1.4000 | 1.3667      |
| 六直轄市  | 1.0990 | 1.0208 | 1.0156 | 1.0451 | 1.1719 | 1.0885 | 1.4688 | 1.2431 | 1.4115 | 1.5625 | 1.4870      |
| 各縣市   | 1.0141 | 1.0000 | 1.0000 | 1.0047 | 1.1901 | 1.1197 | 1.6056 | 1.3052 | 1.4225 | 1.5070 | 1.4648      |
| 全國    | 1.0629 | 1.0120 | 1.0090 | 1.0279 | 1.1796 | 1.1018 | 1.5269 | 1.2695 | 1.4162 | 1.5389 | 1.4775      |

#### 一、地理風險

地政士整體地理風險值都很低,只有新北市在「是否涉及高風險國家或地區之不動產」及「客戶資金主要來源及去向」略高一些(仍低於1.1,如圖2)。

不動產經紀業整體地理風險值略高於地政士,尤其是「仲介或代銷業務活動範圍」項目風險值較高,推估是不動產經紀業可能涉及海外不動產銷售風險較高,而高雄市此項評估結果更是六直轄市中最高者(如圖3)。

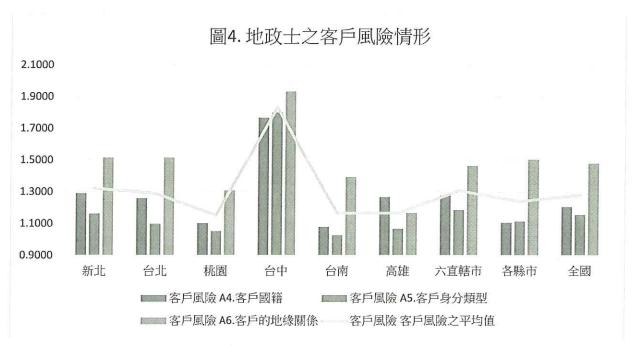


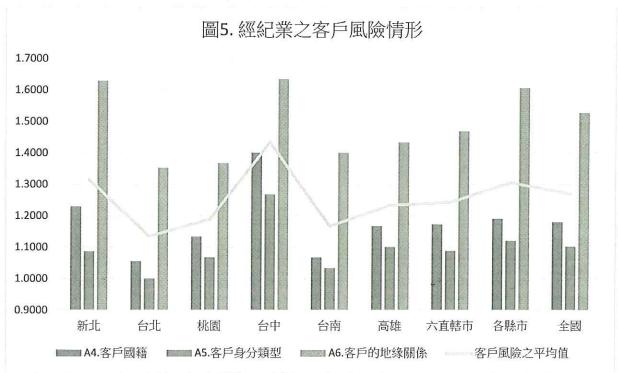


#### 二、客戶風險

地政士的整體客戶風險值略高於地理風險,其中「客戶的地緣關係」風險 值較高,尤其是台中市,表示客戶可能來自其非鄰近地區;又台中市客戶風險 平均值亦明顯高於其他直轄市、縣市(如圖 4)。

不動產經紀業之客戶風險值亦高於地理風險,同樣以「客戶的地緣關係」 風險值明顯較高,尤其是新北市及台中市評估結果風險值較高;而台中市整體 客戶風險平均值亦明顯高於其他直轄市、縣市(如圖 5)。

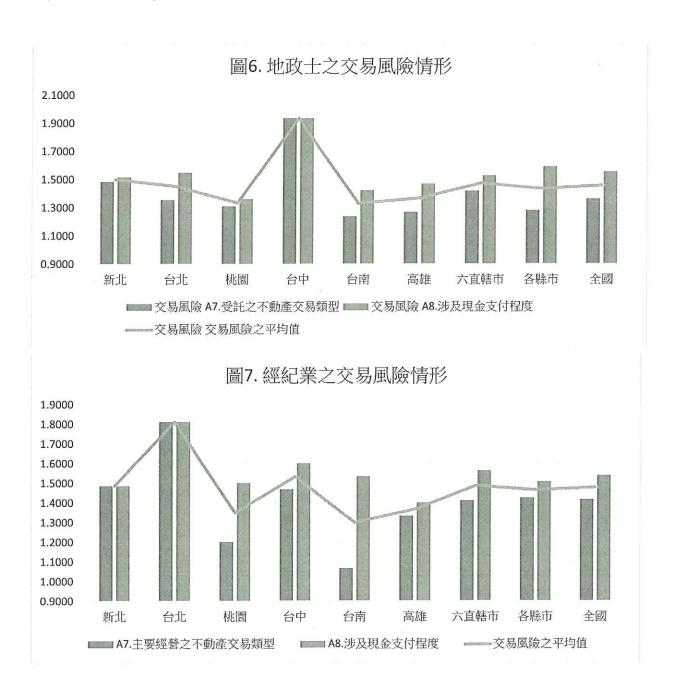




#### 三、交易風險

地政士的整體交易風險值高於地理風險及客戶風險,其中「涉及現金支付程度」風險值較高,尤其是台中市,表示部分客戶可能現金支付全部或部分價款;又台中市交易風險平均值亦明顯高於其他直轄市、縣市(如圖 6)。

不動產經紀業之交易風險值高於地理風險及客戶風險,其中「涉及現金支付程度」風險值較高,尤其是台北市,表示部分客戶可能現金支付全部或部分價款;又台北市交易風險平均值亦明顯高於其他直轄市、縣市(如圖7)。



#### 参、結語

依上述風險評估結果,地政士及不動產經紀業面臨最高洗錢及資恐風險為 交易風險,主要源自於部分客戶可能使用現金支付全部或部分價款,且銷售不動 產包含一般住宅以外的商業用不動產、高價豪宅等;其次是客戶風險,但僅限於 「客戶的地緣關係」,即客戶是否來自鄰近地區,而非風險較高之外籍客戶、重 要政治性職務人士等;地理風險都很低,只是因為不動產經紀業涉及海外不動產 經營風險稍高。

雖然本次風險評估係採抽樣方式辦理,樣本數不多,可能導致直轄市在地理 風險、客戶風險及交易風險出現個別差異,但整體評估結果大致與對產業者認知 相近。

# 附錄 1. 地政士從事不動產買賣交易有關行為之洗錢風險評估表

為了解地政士面臨洗錢之地域、客戶及交易風險,請就地政士事務所整體從事不動產買賣交易實際情形,勾選下表各問項之答案,及於必要時填寫補充說明或建議事項,以利本部進行地政士洗錢風險評估,供改善防制洗錢工作之參考。

| 風險類別          | 低風險             | 中風險             | 高風險        | 非常高風險    |
|---------------|-----------------|-----------------|------------|----------|
| /因素           | (1分)            | (2分)            | (3分)       | (4分)     |
|               |                 | 地域風險            |            |          |
| Q1.業務活動<br>範圍 | 僅能在國內從事<br>業務活動 |                 |            |          |
| A1.(請勾選)      | ✓               |                 |            |          |
| 補充說明或建        | 議事項:            |                 |            |          |
| Q2. 是否涉及      | 未涉及制裁名單         | 涉及納入國際防         | 涉及洗錢防制有    | 涉及制裁名單國  |
| 高風險國家         | 或高洗錢及資恐         | 制洗錢相關組織         | 嚴重缺失、部分未   | 家、地區之不動產 |
| 或地區之不         | 風險國家、地區之        | 追蹤名單國家、地        | 遵循或未充分遵    | (朝鮮:北韓)  |
| 動產(請以最        | 不動產             | 區之不動產(不         | 循國家、地區之不   |          |
| 近一年業務         |                 | 丹、馬爾代夫、巴        | 動產(伊朗、波士   |          |
| 情形填寫)         |                 | 基斯坦、巴布亞新        | 尼亞與赫塞哥維    |          |
|               |                 | 幾內亞、菲律賓、        | 納、衣索比亞、伊   |          |
|               |                 | 阿富汗、寮國(老        | 拉克、斯里蘭卡、   |          |
|               |                 | 撾)、越南、文萊        | 敘利亞、千里達及   |          |
|               |                 | (汶萊))           | 托巴哥、突尼西    |          |
|               |                 |                 | 亞、萬那杜、葉門)  |          |
| A2.(請勾選)      |                 |                 |            | •        |
| 補充說明或建        | 議事項:            |                 |            | 45       |
| Q3. 客戶資金      | 資金主要來自或         | 資金部分來自或         | 資金部分來自或    | 資金部分來自或  |
| 主要來源及         | 流向國內,或非屬        | 流向國際防制洗         | 流向洗錢防制有    | 流向制裁名單國  |
| 去向(請以最        | 制裁名單或高洗         | 錢相關組織追蹤         | 嚴重缺失、部分未   | 家、地區(朝鮮  |
| 近一年業務         | 錢及資恐風險國         | 名單國家、地區         | 遵循或未充分遵    | 北韓)      |
| 情形填寫)         | 家、地區            | (不丹、馬爾代         | 循國家、地區(伊   |          |
|               |                 | 夫、巴基斯坦、巴        | 朗、波士尼亞與赫   |          |
|               |                 | 布亞新幾內亞、菲        | 塞哥維納、衣索比   |          |
|               |                 | 律賓、阿富汗、寮        | 亞、伊拉克、斯里   |          |
|               |                 | E ( + 10 ) 10 + | せ ト ハイノエ イ | 17.50    |

國(老撾)、越南、蘭卡、敘利亞、千

|           |   | 文萊(汶萊))      | 里達及托巴哥、突   |                 |
|-----------|---|--------------|--|-----------------|
|           |   |              | 尼西亞、萬那杜、   |                 |
|           |   |              | 葉門)  |                 |
| A3. (請勾選) |   |              |  |                 |
| 補充說明或建    | *議事項:                                   |              |  |                 |
|           |   | 客戶風險         |  |                 |
| Q4. 客戶國籍  | 客戶均為本國人                                 | 客戶絕大部分為      | 客戶大部分為本  | 客戶大部分為外         |
|           |   | 本國人,僅偶有外     | 國人,但已有相當   | 國人              |
|           |   | 國人           | 數量為外國人   |                 |
| A4. (請勾選) |   |              |  |                 |
| 補充說明或建    | 議事項:                                    | 1            |  | 1               |
|           |   |              |  |                 |
| 00        | about the state of                      | A            |  |                 |
| Q5. 客戶身分  | NAME OF TAXABLE PARTY OF TAXABLE PARTY. |              | 客戶大部分為自  | 客戶多為 PEPs 或     |
| 類型        | 且非重要政治性                                 |              | 然人,且已有相當   | 高資產人士           |
|           | 職務人士(簡稱                                 |              | 180   18180   500   1810   1 |                 |
|           | PEPs)或高資產人                              | +            | 資產人士   |                 |
|           | 士                                       |              |  |                 |
| A5. (請勾選) |   |              |  |                 |
| 補充說明或建    | 議事項:                                    |              |  |                 |
|           |   |              |  |                 |
|           | <b>3</b> .                              |              |  |                 |
| Q6. 客戶的地  | <b>党台</b>                               | 京台加上 in 八为   | <b>ウムナホム</b> ロ   | <b>安公夕市台北</b> 山 |
|           | 客户均為同一縣                                 | 客戶絕大部分為      | 客戶有來自同一  | 客戶多來自非剛         |
| 緣關係       | 市或毗鄰縣市之                                 | 同一縣市或毗鄰      | 縣市或毗鄰縣市  | 鄰縣市,極少有同        |
|           | 居民                                      | 縣市居民,偶有來     | 居民,亦有相當數   | 一縣市或毗鄰縣         |
|           |   | 自其他非毗鄰縣      | 量來自其他非毗  | 市居民             |
| 15 (11 1) |   | 市居民          | <b>鄰縣市居民</b>   |                 |
| A6.(請勾選)  |   |              |  |                 |
| 補充說明或建    | 議事項:                                    |              |  |                 |
|           |   |              |  |                 |
|           |   | <b>立日口</b> 队 |  |                 |
| 07 BY L-  | 应以下到文儿丛                                 | 交易風險         | <b>企业于4 + 10 16</b>  | ムソーシャカル         |
| Q7. 受託之不  | 受託不動產均為                                 | 受託不動產除多      | 受託不動產多為  | 受託不動產多為         |
| 動產交易類     | 一般常見供自住                                 | 為一般常見供自      | 空地、新成屋或預   | 高價豪宅、商業大        |
| 型         | 使用之房屋                                   | 住使用之房屋,亦     | 售屋等供投資、出   | 樓或可供投資、出        |
|           |   | 有為空地、新成屋     | 租或易於轉售變  | 租或易於轉售大         |
|           |   | 或預售屋等供投      | 現等產品,少有自   | 量變現等產品為         |

|            |           | 資、出租或易於轉 | 住使用之房屋   | 主,極少有自住使 |
|------------|-----------|----------|----------|----------|
|            |           | 售變現等產品   |          | 用之房屋     |
| A7. (請勾選)  |           | St       |          |          |
| 補充說明或建     | 議事項:      |          |          |          |
| Q8. 涉及現金   | 客戶均自行轉帳   | 客戶大多自行轉  | 客户較少自行轉  | 客户大多使用現  |
| 支付程度       | 或匯款,未使用現  | 帳或匯款;少部分 | 帳或匯款;較多使 | 金支付全部或部  |
|            | 金支付全部或部   | 使用現金支付全  | 用現金支付全部  | 分價金      |
|            | 分價金       | 部或部分價金   | 或部分價金    |          |
| A8. (請勾選)  |           |          |          |          |
|            |           | 其他建議事項   |          |          |
| 受訪者基本資地政士: | <b>資料</b> |          | □小姐      | x        |
| 事務所所在位     | 立置:       | 市(縣)     | 鄉。       | 鎮區       |
| 聯絡電話:      | _         |          |          |          |
| 中華民        | 國         | 年        | 月        | 日        |

# Money Laundering Risk Assessment of Real Estate Transactions by Land Administration Agents

Land administration agent firms are requested to select answers from the questionnaire below for the Ministry to understand the general geographical, customer, and transaction risks in money laundering. They are also requested to check the answers for the following questions and provide supplementary descriptions or recommendation items for the Ministry to perform money laundering risk assessments for land administration agents as reference for improving money laundering tasks.

Sincerely, Ministry of the Interior (Department of Land Administration)

| Risk Type<br>/Factors  | Low Risk<br>(2 points)  | Medium Risk<br>(3 points)   | High Risk<br>(4 points)  | Very High Risk<br>(5 points)   |
|--|---|---|--|--|
|  |   | Geographical Ris  | K  |  |
| Q1. Business activity scope  A1.(Please indicate with check mark)  | Restricted to domestic businesses activities  |   |  |  |
| A STATE OF THE PARTY OF THE PAR | nations or recomme  | ndations:   |  |  |
| Q2. Whether there is involvement in real estate from high-risk countries or regions (please fill out information based on the business conditions in the most recent year)   | No involvement of real estate properties in countries or regions on the sanctions list or high ML/TF risk countries and regions | Involvement of real estate properties in countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and Brunei) | Involvement of real estate properties in countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia, Vanuatu, and Yemen) | Involvement of real estate properties in countries or regions on the sanctions list (Democratic People's Republic of Korea: North Korea) |
| A2.(Please indicate with   |   |   | Tomony   |  |

| check mark)  |  |   |   |                                  |
|--|--|---|---|----------------------------------|
| Additional expla   | nations or recomme   | ndations:   | •   |                                  |
| 12   |  |   |   |                                  |
| Q3. Main customer funding source and flow (please fill out information based on the business conditions of the most recent year) | Main funding source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and regions | source from or to countries and regions on the tracking list of related international anti- | Partial funding source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia, Vanuatu, and Yemen) | source from or to<br>countries o |
| A3.(Please indicate with check mark)   | nations or recomme   | ndations  | remeny  |                                  |
| Additional explai  | nations of recomme   | iluations.  |   |                                  |
| + 112  |  | Customer risks  |   |                                  |
| Q4. Customer nationality   | Customers are all domestic citizens  | Most customers<br>are domestic<br>citizens and a few<br>are foreigners                      | Most customers are domestic citizens but a substantial number of customers are foreigners   |                                  |
| A4.(Please indicate with check mark)   |  |   |   |                                  |

| A5.(Please indicate with check mark)                                 | Customers are all natural persons and not politically exposed persons (PEPs) or individuals with large amounts of assets | are natural persons and only a few are PEPs or individuals with large amounts of assets  | are natural persons and only a significant   | are PEPs or individuals with large amounts of assets  |
|--|--|--|--|---|
| Q6. Customer geographic relationship  A6.(Please indicate with       |  | Most customers are residents from the same county,   | are residents from the same county,  | are residents from other non-neighboring counties and cities, and only a few are residents from the same county, city, or   |
| check mark)<br>Additional expla                                      | nations or recommer  | ndations:  |  |   |
|  |  | Transaction risk   |  |   |
| Q7.Transaction<br>type for<br>entrusted real<br>estate<br>properties | Entrusted real estate properties are common self-use residences  | Entrusted real estate properties are mostly common self-use residences as well as vacant lots, newly-built houses, pre-sales houses for investment, lease, or products that are easy to sell | Entrusted real estate properties are mostly vacant lots, newly-built houses, pre-sales houses for investment, lease, or products that are easy to sell; self-use residences are rare | Entrusted real estate properties are mostly high-priced luxury residences, commercial buildings, or products available for investment and lease and are easy to sell; selfuse residences are extremely rare |

| A7.(Please indicate with check mark)      |   |                    |  |  |
|---|---|--------------------|--|--|
| Additional expla                          | nations or recomme  | ndations:          |  |  |
| Q8. Degree of involvement in cash payment | All customers transfer or wire funds by themselves and they do not use cash to pay for all or part of the fund transfer | transfer or wire   | Customers do not usually transfer or wire funds by themselves; more customers use cash to pay for all or part of the fund transfer | Customers mostly<br>use cash to pay for<br>all or part of the<br>fund transfer |
| A8.(Please indicate with check mark)      |   |                    |  |  |
| Additional expla                          | nations or recomme  | ndations:          |  |  |
|   |   | Other recommendati | ons  |  |
|   |   | ş                  |  |  |
| Basic informat                            | ion of interviewe   | e                  |  |  |
| Land Administr                            | ation Agent:  |                    |  | ⁄liss.   |
| Location of Firr                          | n: Ci   | ty (County)        | Townsh   | ip/Town/District   |
| Telephone No.:                            | :   |                    |  |  |
|   | (dd/mm/yyyy)  |                    |  |  |

## 附錄 2. 不動產經紀業從事不動產買賣交易有關行為之洗錢風險評估

為了解不動產經紀業面臨洗錢之地域、客戶及交易風險,請就貴公司(營業據點或商號)整體從事不動產買賣交易實際情形,勾選下表各問項之答案,及於必要時填寫補充說明或建議事項,以利本部進行不動產經紀業洗錢風險評估,供改善防制洗錢工作之參考。

内政部(地政司) 敬上

| 風險類別     | 低風險      | 中風險      | 高風險  | 非常高風險          |
|----------|----------|----------|--|----------------|
| /因素      | (1分)     | (2分)     | (3分)   | (4分)           |
|          |          | 地域風險     | _ *a = 0 10 10 10 10 10 10 10 10 10 10 10 10 1 |                |
| Q1. 仲介或代 | 僅仲介或代銷國  | 以仲介或代銷國  | 同時仲介或代銷  | 以仲介或代銷海        |
| 銷業務活動    | 內不動產     | 內不動產為主,偶 | 國內、海外不動  | 外不動產為主         |
| 範圍       |          | 有或少部分為海  | 產,且數量相當  |                |
|          | =        | 外不動產     |  |                |
| A1.(請勾選) |          |          |  |                |
| 補充說明或建   | 議事項:     |          |  |                |
| Q2. 是否涉及 | 未涉及制裁名單  | 涉及納入國際防  | 涉及洗錢防制有  | 涉及制裁名單國        |
| 高風險國家    | 或高洗錢及資恐  | 制洗錢相關組織  | 嚴重缺失、部分未                                       | 家、地區之不動產       |
| 或地區之不    | 風險國家、地區之 | 追蹤名單國家、地 | 遵循或未充分遵  | (朝鮮:北韓)        |
| 動產(請以最   | 不動產      | 區之不動產 (不 | 循國家、地區之不                                       |                |
| 近一年業務    |          | 丹、馬爾代夫、巴 | 動產(伊朗、波士                                       |                |
| 情形填寫)    |          | 基斯坦、巴布亞新 | 尼亞與赫塞哥維  |                |
|          |          | 幾內亞、菲律賓、 | 納、衣索比亞、伊                                       |                |
| 23       |          | 阿富汗、寮國(老 | 拉克、斯里蘭卡、                                       | attended to be |
|          |          | 撾)、越南、文萊 | 敘利亞、千里達及                                       |                |
|          |          | (汶萊))    | 托巴哥、突尼西  |                |
|          |          |          | 亞、萬那杜、葉門)                                      |                |
| A2.(請勾選) |          |          |  |                |
| 補充說明或建   | 議事項:     |          |  |                |
|          |          |          |  |                |
| Q3. 客戶資金 | 資金主要來自或  | 資金部分來自或  | 資金部分來自或  | 資金部分來自或        |
| 主要來源及    | 流向國內,或非屬 | 流向國際防制洗  | 流向洗錢防制有  | 流向制裁名單國        |
|          |          |          |  |                |

名單國家、地區 遵循或未充分遵 北韓)

(不丹、馬爾代 循國家、地區(伊 夫、巴基斯坦、巴 朗、波士尼亞與赫

近一年業務

情形填寫)

錢及資恐風險國

家、地區

|  |  | 布亞新幾內亞、菲                                    | 塞哥維納、衣索比                                |                     |
|--|--|---|---|---------------------|
|  |  | 律賓、阿富汗、寮                                    | 亞、伊拉克、斯里                                |                     |
|  |  | 國 (老撾)、越南、                                  | 蘭卡、敘利亞、千                                |                     |
|  |  | 文萊(汶萊))                                     | 里達及托巴哥、突                                |                     |
|  |  |   | 尼西亞、萬那杜、                                |                     |
|  |  |   | 葉門)                                     |                     |
| A3. (請勾選)                              |  |   |   |                     |
| 補充說明或建                                 | 議事項:                                   |   |   |                     |
|  |  | 客戶風險  |   |                     |
| Q4. 客戶國籍                               | 客戶均為本國人                                | 客戶絕大部分為                                     | 客戶大部分為本                                 | 客戶大部分為外             |
| ,                                      | * 000 * 0 00 0 0 0 0 0 0 0 0 0 0 0 0 0 | 本國人,僅偶有外                                    | 國人,但已有相當                                | 國人                  |
|  |  | 國人  | 數量為外國人                                  |                     |
| A4. (請勾選)                              |  |   |   |                     |
| 補充說明或建                                 | 議事項:                                   |   |   |                     |
|  |  |   |   |                     |
| Q5. 客戶身分                               | 客户都為自然人,                               | 客戶絕大部分為                                     | 客戶大部分為自                                 | 客戶多為 PEPs 或         |
| 類型                                     | 且非重要政治性                                | 自然人,且偶有                                     | 然人,且已有相當                                | 高資產人士               |
|  | 職務人士(簡稱                                | PEPs 或高資產人                                  | 數量之 PEPs 或高                             | - 1                 |
|  | PEPs)或高資產人                             | 士   | 資產人士                                    |                     |
|  | 士                                      |   |   |                     |
| A5. (請勾選)                              |  |   |   |                     |
| 補充說明或建                                 | 議事項:                                   |   |   |                     |
|  | W T X                                  |   |   |                     |
|  | 44 T X                                 |   |   |                     |
| Q6. 客戶的地                               | 客戶均為同一縣                                | 客戶絕大部分為                                     | 客戶有來自同一                                 | 客戶多來自非毗             |
|  | 客戶均為同一縣                                | 客戶絕大部分為同一縣市或毗鄰                              | 客戶有來自同一縣市或毗鄰縣市                          | 客戶多來自非毗 鄰縣市,極少有同    |
| Q6. 客戶的地<br>緣關係                        | 客戶均為同一縣<br>市或毗鄰縣市之                     | 同一縣市或毗鄰                                     | 1 200 1804 Added Cale 1 774 Ad 303 0040 | 鄰縣市,極少有同            |
|  | 客戶均為同一縣                                | 同一縣市或毗鄰縣市居民,偶有來                             | 縣市或毗鄰縣市居民,亦有相當數                         | 鄰縣市,極少有同<br>一縣市或毗鄰縣 |
|  | 客戶均為同一縣<br>市或毗鄰縣市之                     | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣              | 縣市或毗鄰縣市                                 | 鄰縣市,極少有同            |
| 緣關係                                    | 客戶均為同一縣<br>市或毗鄰縣市之                     | 同一縣市或毗鄰縣市居民,偶有來                             | 縣市或毗鄰縣市<br>居民,亦有相當數<br>量來自其他非毗          | 鄰縣市,極少有同<br>一縣市或毗鄰縣 |
| Q6. 客戶的地<br>緣關係<br>A6. (請勾選)<br>補充說明或建 | 客戶均為同一縣 市或毗鄰縣市之居民                      | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣              | 縣市或毗鄰縣市<br>居民,亦有相當數<br>量來自其他非毗          | 鄰縣市,極少有同<br>一縣市或毗鄰縣 |
| 緣關係<br>A6.(請勾選)                        | 客戶均為同一縣 市或毗鄰縣市之居民                      | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣              | 縣市或毗鄰縣市<br>居民,亦有相當數<br>量來自其他非毗          | 鄰縣市,極少有同<br>一縣市或毗鄰縣 |
| 緣關係<br>A6.(請勾選)                        | 客戶均為同一縣 市或毗鄰縣市之居民                      | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣              | 縣市或毗鄰縣市<br>居民,亦有相當數<br>量來自其他非毗          | 鄰縣市,極少有同<br>一縣市或毗鄰縣 |
| 緣關係<br>A6.(請勾選)<br>補充説明或建              | 客戶均為同一縣 市或毗鄰縣市之居民 議事項:                 | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣<br>市<br>交易風險 | 縣市或毗鄰縣市<br>居民,亦有相當數<br>量來自其他非毗          | 鄰縣市,極少有同<br>一縣市或毗鄰界 |
| 緣關係<br>A6.(請勾選)                        | 客戶均為同一縣 市或毗鄰縣市之居民                      | 同一縣市或毗鄰<br>縣市居民,偶有來<br>自其他非毗鄰縣<br>市         | 縣市或毗鄰縣市居民,亦有相當數量來自其他非毗<br>鄰縣市           | 鄰縣市,極少有同一縣市或毗鄰県市居民  |

|           |            | 有為空地、新成屋     | 租或易於轉售變       | 租或易於轉售大  |
|-----------|------------|--------------|---------------|----------|
|           |            | 或預售屋等供投      | 現等產品,少有供      | 量變現等產品為  |
|           |            | 資、出租或易於轉     | 自住使用之房屋       | 主,極少有供自住 |
|           |            | 售變現等產品       |               | 使用之房屋    |
| A7. (請勾選) |            |              |               |          |
| 補充說明或建    | 議事項:       |              |               | s        |
| Q8. 涉及現金  | 客戶均自行轉帳    | 客戶大多自行轉      | 客户較少自行轉       | 客戶大多使用現  |
| 支付程度      | 或匯款,未使用現   | 帳或匯款;少部分     | 帳或匯款;較多使      | 金支付全部或部  |
|           | 金支付全部或部    | 使用現金支付全      | 用現金支付全部       | 分價金      |
|           | 分價金        | 部或部分價金       | 或部分價金         |          |
| A8. (請勾選) |            |              |               |          |
| 受訪者基本資    | *          |              |               |          |
|           |            | . 坐          | <del>**</del> |          |
| 不動產經紀業    |            |              | 未             |          |
| 是否經營國外    | 、不動產: □是   | □否           |               |          |
| 公司(據點或    | 商號)所在位置    |              | 市(縣)          | 鄉鎮區      |
| 員工人數:     | □1-5人 □6-3 | 10人 □11-20 / | 人 □20 人以上     |          |
| 填表人:      |            | □先生 □        | 小姐            |          |
| 聯絡電話:     |            |              |               |          |
| 中華民       | 國          | 年            | 月             | 日        |

# Money Laundering Risk Assessment of Real Estate Transactions by Real Estate Brokers

Your company (business outlet or business) is requested to select answers from the questionnaire below for the Ministry to understand the general geographical, customer, and transaction risks in money laundering. You are also requested to check the answers for the following questions and provide supplementary descriptions or recommendation items for the Ministry to perform money laundering risk assessments for real estate brokers as reference for improving money laundering tasks.

Sincerely,

Ministry of the Interior (Department of Land Administration)

| Risk Type<br>/Factors   | Low risk<br>(2 points)  | Medium risk<br>(3 points)  | High risk<br>(4 points) | Very High Risk<br>(5 points)   |
|---|---|--|-------------------------|--|
|   |   | Geographical Risl  | <b>(</b>                |  |
| Q1. Business activity scope of agencies or sales representative | Acts as agency or sales representative for only domestic real estate properties | Acts mainly as agency or sales representative for domestic real estate properties with occasional or few overseas real estate properties | 7237                    | Acts mainly as agency or sales representative for foreign real estate properties |
| A1. (Please indicate with check mark)                           |   |  |                         |  |

| Q2. Whether there is  | I AL CONTRACTOR   |  |  |   |
|---|---|--|--|---|
| there is  |   |  | The state of the s | Involvement of  |
|   | of real estate  | real estate  | real estate  | real estate   |
| involvement   | properties in   | properties in  | properties in  | properties in   |
| in real estate  | countries or  | countries and  | countries and  | countries or  |
| from high-risk  | regions on the  | regions on the   | regions with   | regions on the  |
| countries or  | sanctions list or   | tracking list of   | severe   | sanctions list  |
| regions   | high ML/TF risk   | related  | deficiencies,  | (Democratic   |
| (please fill out  | countries and   | international anti-  | partial non-   | People's Republic   |
| information   | regions   | money laundering   | compliance, or   | of Korea: North   |
| based on the  |   | organizations  | total non-   | Korea)  |
| business  |   | (Bhutan,   | compliance in  |   |
| conditions of   |   | Maldives,  | money laundering   |   |
| the most  |   | Pakistan, Papua  | prevention (Iran,  |   |
| recent year)  | 8   | New Guinea, the  | Bosnia and   |   |
|   |   | Philippines,   | Herzegovina,   |   |
|   |   | Afghanistan, Laos,   | Ethiopia, Iraq, Sri  |   |
|   |   | Vietnam, and   | Lanka, Syria,  |   |
|   |   | Brunei)  | Trinidad and   |   |
|   |   |  | Tobago, Tunisia,   |   |
|   |   |  | Vanuatu, and   |   |
|   |   |  | Yemen)   |   |
| A2.(Please  |   |  | •  |   |
| indicate with   |   |  |  |   |
| check mark)   |   |  |  |   |
| Additional expla  | nations or recomme  | endations:   |  |   |
|   |   |  |  |   |
| Q3. Main  | Main funding  | Partial funding  | Partial funding  | Partial funding   |
| Q3. Main customer   | Main funding source from or to  |  | Partial funding source from or to  | Partial funding source from or to   |
|   |   | The second secon |  |   |
| customer  | source from or to   | source from or to countries and  | source from or to countries and  | source from or to countries or  |
| customer<br>funding<br>source and   | source from or to<br>domestic entities<br>or countries or   | source from or to countries and  | source from or to countries and  | source from or to   |
| customer<br>funding<br>source and<br>flow (please   | source from or to<br>domestic entities<br>or countries or   | source from or to<br>countries and<br>regions on the<br>tracking list of   | source from or to<br>countries and<br>regions with<br>severe   | source from or to countries or regions that are on the sanctions  |
| customer<br>funding<br>source and<br>flow (please   | source from or to<br>domestic entities<br>or countries or<br>regions that are   | source from or to<br>countries and<br>regions on the<br>tracking list of   | source from or to countries and regions with severe deficiencies,  | source from or to countries or regions that are on the sanctions list (Democratic   |
| customer funding source and flow (please fill out information   | source from or to<br>domestic entities<br>or countries or<br>regions that are<br>not on the<br>sanctions list or                    | source from or to countries and regions on the tracking list of related international anti-  | source from or to countries and regions with severe deficiencies, partial non-   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic                                   |
| customer funding source and flow (please fill out information   | source from or to<br>domestic entities<br>or countries or<br>regions that are<br>not on the<br>sanctions list or<br>high ML/TF risk | source from or to countries and regions on the tracking list of related international antimoney laundering   | source from or to countries and regions with severe deficiencies, partial noncompliance, or  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business   | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total non-   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic                                   |
| customer funding source and flow (please fill out information based on the  | source from or to<br>domestic entities<br>or countries or<br>regions that are<br>not on the<br>sanctions list or<br>high ML/TF risk | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan,  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives,  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in                                   | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran,  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines,   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina,  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos,  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria,  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos,  | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia,  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most                          | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia, Vanuatu, and   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most recent year)             | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia,  | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most recent year)  A3.(Please | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia, Vanuatu, and   | source from or to countries or regions that are on the sanctions list (Democratic People's Republic of Korea: North                   |
| customer funding source and flow (please fill out information based on the business conditions in the most recent year)             | source from or to domestic entities or countries or regions that are not on the sanctions list or high ML/TF risk countries and     | source from or to countries and regions on the tracking list of related international antimoney laundering organizations (Bhutan, Maldives, Pakistan, Papua New Guinea, the Philippines, Afghanistan, Laos, Vietnam, and   | source from or to countries and regions with severe deficiencies, partial noncompliance, or total noncompliance in money laundering prevention (Iran, Bosnia and Herzegovina, Ethiopia, Iraq, Sri Lanka, Syria, Trinidad and Tobago, Tunisia, Vanuatu, and   | source from or to<br>countries or<br>regions that are<br>on the sanctions<br>list (Democratic<br>People's Republic<br>of Korea: North |

|   | Customer risks  |   | v13   |
|---|---|---|---|
| Customers are all domestic citizens   | Most customers<br>are domestic<br>citizens and a few<br>are foreigners  | Most customers are domestic citizens but a substantial number of customers are foreigners   | Most customers are foreigners   |
|   |   |   |   |
| anations or recomme   | endations:  |   |   |
| Customers are all natural persons and not politically exposed persons (PEPs) or individuals with high amounts of assets | a few are PEPs or   | Most customers are natural persons, and only a significant number of customers are PEPs or individuals with high amounts of assets  | Most customers<br>are PEPs or<br>individuals with<br>high amounts of<br>assets  |
|   |   |   |   |
| inations or recomme   | ndations:   |   |   |
| Customers are all residents from the same county, city, or nearby counties and cities                                   |   | 507   | are residents from other non-   |
|   |   | counties and cities   |   |
|   | customers are all natural persons and not politically exposed persons (PEPs) or individuals with high amounts of assets  Customers are all residents from the same county, city, or nearby counties and | domestic citizens are domestic citizens and a few are foreigners  Customers are all natural persons and not politically exposed persons (PEPs) or individuals with high amounts of assets  Customers are all persons, and only a few are PEPs or individuals with high amounts of assets  Customers are all residents from the same county, city, or nearby counties and cities  Most customers are individuals with high amounts of assets  Most customers are residents from the same county, city, or nearby counties and cities, and a few are from other non-neighboring | domestic citizens are domestic citizens and a few are foreigners are foreigners  anations or recommendations:  Customers are all natural persons and not politically exposed persons (PEPs) or individuals with high amounts of assets  Most customers are natural persons, and only a few are PEPs or individuals with high amounts of assets  Customers are all residents from the same county, city, or nearby counties and cities  Most customers are natural persons, and only a significant number of customers are PEPs or individuals with high amounts of assets  Most customers are PEPs or individuals with high amounts of assets  Some customers are residents from the same county, city, or nearby counties and cities, and a few are from other non-neighboring |

| Q7. Transaction type for real estate properties in main operations   | Transactions of real estate properties are common self-use residences   | Transactions of real estate properties are mostly common self-use residences as well as vacant lots, newly-built houses, pre-sales houses for investment, lease, or products that are easy to sell | real estate properties are mostly vacant lots, newly-built houses, pre-sales houses for investment, lease, or products that are easy to sell; self-use | real estate properties are mostly high-priced luxury residences, commercial |
|--|---|--|--|---|
| A7.(Please indicate with check mark)   |   |  |  |   |
| Additional expla   | nations or recomme  | ndations:  |  |   |
| Q8. Degree of involvement in cash payment  | All customers transfer or wire funds by themselves and they do not use cash to pay for all or part of the fund transfer | Most customers<br>transfer or wire<br>funds by<br>themselves; a few<br>customers use<br>cash to pay for all<br>or part of the fund<br>transfer   | Customers do not usually transfer or wire funds by themselves; More customers use cash to pay for all or part of the fund transfer                     | use cash to pay for   |
| A8. (Please indicate with check mark)  |   |  |  |   |
| Additional expla   | nations or recomme  | ndations:  |  |   |
|  | (   | Other recommendati   | ons  |   |
| Real estate broken Real estate broken | ker type:   | ency Sales reproperties: Yes iness) location:own/District  | S No<br>City (C  | ounty)  |