



DUTY
STANDARD
CARE

數字資產儲備行

Indicative Risk Categorization

Low Risk (Level 1)	
RL101	Individuals (Other than included in High and Medium Risk categories below)
RL102	Government departments and Government owned Companies, regulatory and statutory bodies
RL103	NOPs / NGOs promoted by United Nations or its agencies
RL104	All other categories of customer not falling under High and Medium Risk classifications.
Medium Risk (Level 2)	
RL201	Non Bank Financial Institution
RL202	Stock brokerage
RL203	Import/ Export
RL204	Gas Station
RL205	Car/ Boat/ Plane Dealership
RL206	Electronics (wholesale)
RL207	Travel agency
RL208	Used car sales
RL209	Telemarketers
RL210	Providers of telecommunications service, internet café, IDD call service, phone cards, phone center.
RL211	Dot-com company or internet business
RL212	Pawnshops
RL213	Auctioneers
RL214	Cash-intensive Businesses such as restaurants, retail shops, parking garages, fast food stores, movie theaters, etc.
RL215	Sole Practitioners or Law firms (small, little known)
RL216	Notaries (small, little known)
RL217	Secretarial (small, little known)
RL218	Accountants (small, little known)
RL219	Venture capital companies
High Risk (Level 3)	
RL301	Individuals and entities in various United Nations Security council Resolutions (UNSCRs) such as UN 1267 etc.



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RL302	Individuals and entities in watch lists issued by Interpol and other similar international organizations.
RL303	customers with dubious reputation as per public information available or commercially available watch lists.
RL304	Individuals and entities specifically identified by regulators, and other competent authorities as high-risk.
RL305	customers conducting their business relationship or transaction in unusual circumstances, such as significant and unexplained geographic distance between the institution and the location of the customer, frequent and unexplained movement of accounts to different institutions in various geographic locations etc.
RL306	customers based in countries/jurisdictions or locations that have been identified by the FATF as jurisdictions with strategic AML/CTF deficiencies
	customers based in countries subject to sanctions, embargos or similar measures issued by, for example, the United Nations
	customers based in countries which are vulnerable to corruption
	customers based in countries that are believed to have strong links to terrorist activities
RL307	Politically exposed persons (PEPs) of foreign origin, customers who are close relatives of PEPs and accounts of which a PEP is the ultimate beneficial owner
RL308	Non-resident customers and foreign nationals
RL309	Embassies/ Consulates
RL310	Offshore (foreign) corporation/business
RL311	Non face-to-face customers
RL312	High net worth individuals
RL313	Partnership Firms
RL314	Firms with “sleeping partners”
RL315	Companies having close family shareholding or beneficial ownership
RL316	Complex business ownership structures, which can make it easier to conceal underlying beneficiaries, where there is no legitimate commercial rationale
RL317	Shell companies which have no physical presence in the country in which it is incorporated. The existence simply of a local agent or low level staff does not constitute physical presence
RL318	Entities with unexplained use of corporate structures, express trusts and nominee shares, and use of bearer shares
	Entities with unexplained delegation of authority by the customer through the use of

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	powers of attorney, mixed boards and/or representative offices
	Entities with unexplained relationship between the customer’ s beneficial owners and controllers and account signatories
	Investment Management/Money Management Company/Personal Investment Company
RL319	Accounts for “gatekeepers’ such as accountants, lawyers, or other professionals for their customers where the identity of the underlying customer is not disclosed to the financial institution
RL320	customer Accounts managed by professional service providers such as law firms, accountants, agents, brokers, fund managers, trustees, custodians, etc
RL321	Trusts, charities, NGO’ s/NPOs unregulated clubs and organizations receiving donations (excluding NPOs/NGOs promoted by United Nations or its agencies)
RL322	Money service Business: including seller of: Orders/ Travelers Checks / Money Transmission /Check Cashing / Dealing or Exchange
RL323	Business accepting third party cheque
RL324	Gambling/gaming including “junket operators” arranging gambling tours
RL325	Dealers in high value or precious goods e.g. jewel, gem and precious metals dealers, art and antique dealers and auction houses
RL326	Customers engaged in a business which is associated with higher levels of corruption (e.g. arms manufacturers, dealers and intermediaries)
RL327	Customers engaged in industries that might relate to nuclear proliferation activities or explosives.
RL328	Customers that may appear to be multilevel marketing companies etc.
RL329	Customers dealing in Real Estate / Construction Activities and activities of similar nature, estate agents and real estate brokers