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| To: Guotai Junan Securities (Hong Kong) Limited /  Guotai Junan Futures (Hong Kong) Limited /  Guotai Junan FX Limited  (individually and collectively referred to as “Guotai Junan”) | | | | | | | | |
|  | | | | | | | | |
| Dear Sirs, | | | | | | | | |
|  | | | | | | | | |
| Re: Anti-Money Laundering Program (“AML”) for | | | | | | | | |
|  | *[name of financial institution/investment vehicle/appointed institution]* | | | | | | | |
|  | | | | | | | | |
| We, | | *[name of financial institution/investment vehicle/appointed institution]* | | | | | | |
| confirm that we have complied with all anti-money laundering laws and regulations applicable in | | | | | | | | |
| *[name of jurisdiction]* | | | | | | Note and that we have carried out all reasonable anti-money | | |
| laundering checks in respect to our clients/investors in compliance with such laws and regulations. | | | | | | | | |
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| In particular, we confirm that: | | | | | | | | |
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| * We have established and implemented an anti-money laundering program that is reasonably designed to prevent and detect money laundering and any activity that facilitates money laundering, the funding of terrorist activities, consistent with the requirement of locally applicable laws and regulations. We have designated a Money Laundering Reporting Officer (MLRO) to handle AML/KYC escalations and the filing of Suspicious Activity Reports. | | | | | | | | |
| * We maintain a written client/investor identification and verification program. This program, in compliance to locally applicable laws and regulations as well as FATF recommended standards that ensure the identification and verification of the identities of the clients/investors (and where applicable, the beneficial owners, as defined in the applicable laws and regulations) in are conducted to the required standards. | | | | | | | | |
| * In the event that we know or has reason to suspect that any of the clients/investors or Beneficial Owners is a current or former Political Exposed Person (“PEP”), an immediate family member of a PEP, a person who is widely known (or is actually known by us) to maintain a close personal relationship with any such individual, or a corporation, business or other entity that has been formed by or for the benefit of such individual, wehave conducted and will conduct appropriate enhanced due diligence on the client/investor or Beneficial Owner. | | | | | | | | |
| * We are responsible for maintaining the clients/investors and/or beneficial owners (where applicable) record in accordance with the anti-money laundering rules, including identification and verification of the clients/investors and the prospective clients/investors. The information for each clients/investors/beneficial owner is kept on file for at least five (5) years after the termination of our business relationship with our clients/investors. | | | | | | | | |
| * As far as we are aware, the clients/investors funds are derived from legitimate business activities and legitimate sources and that the activities would not contravene applicable money laundering laws, regulations and conventions. | | | | | | | | |
| * If we identify any unusual or suspicious activity which leads us to suspect criminal conduct or money laundering, we report this to our Compliance Department and/or the relevant report authority. | | | | | | | | |
| * We do not engage in business with foreign shell banks, and we will not handle investment or other contributions that originate from, or is routed through an account maintained at a foreign shell bank, a bank organized or chartered under the laws of a NCCT. | | | | | | | | |
| * We provide AML training to our employees. | | | | | | | | |
| * We have a verification process to ensure that our clients/investors are neither individuals or institutions that appear on applicable sanctions lists, as amended from time to time, of suspected or known terrorists or terrorist organizations, nor parties against whom sanctions have been imposed by United Nations, EU, or US Office of Foreign Assets Control. | | | | | | | | |
| * The documentary evidence of the verification processes for the relevant clients/investors will be made available to Guotai Junan, upon request, to the extent permitted by applicable laws. | | | | | | | | |
| * We will notify Guotai Junan promptly of any changes to any of the representations and warranties provided herein and upon request, recertify these representations and warranties. | | | | | | | | |
| * We undertake to indemnify Guotai Junan for any claims, losses, liabilities and/or expenses Guotai Junan may suffer or incur as a result of our breach of any aforesaid representations, and warranties. | | | | | | | | |
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| If you have any questions, please do not hesitate to contact | | | | | | | | *[name of contact person]* |
| at | *[telephone no.]* | | | or | *[email address]*. | | | |
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| Yours faithfully,  For and on behalf of | | | | | | | | |
| *[name of financial institution/investment vehicle/appointed institution]* | | | | | | | | |
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| Authorised Signature(s) with Company Chop | | | | | | |  | |
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| Date | | |  | | | | | |
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| *Note: Jurisdiction should be approved by Guotai Junan* | | | | | | | | |