

## RISK ANALYSIS TEMPLATE

This template serves to guide developers to perform risk analysis to identify, assess and understand their money laundering, proliferation financing and terrorism financing risks, as required under the Housing Developers (Control & Licensing) Act (HDCLA) and Sale of Commercial Properties Act (SCPA), and should be adapted to suit their business context. Developers should consider the risk factors in this template and any other risk factors that are relevant to their business context before determining the overall level of risk and the appropriate type and extent of mitigation measures. The type and extent of the mitigating measures must be appropriate to the risk of money laundering, proliferation financing and terrorism financing and the size of developer's business.

The risk analysis should be performed before the launch of each project and updated regularly, e.g. once every 2 years, or when material trigger events (e.g. acquisition of new customer segments) occur, whichever is earlier.

The ultimate responsibility and accountability for ensuring compliance with the HDCLA and SCPA and their respective rules, rest with the developers' senior management e.g. directors, CEO. As part of the oversight and governance on prevention of ML/PF/TF, developers' risk assessments must be seen and/or evaluated and signed off by the most senior member of the senior management or whoever he/she designates in the senior management team. The directors and senior management should have a good understanding of the risks that the business is exposed to and ensure that the risk mitigating measures adopted are adequate, robust and effective.

### Section A: Risk factors to consider before any project launch

S/N	Risk factor to consider	Indicate whether risk factor is met, i.e. Yes or No. If yes, provide details.
<b>(I) Countries and jurisdictions in which the developers have operations in</b> <i>(Note: If Risk Factor 1 is met, developer should rate itself as "high-risk".)</i>		
1	High risk countries or jurisdictions subject to a call for action by FATF ("FATF black list")	
2	Countries or jurisdictions that are subject to increased monitoring by Financial Action Task Force (FATF) ("FATF grey list")	
<b>(II) Developers' services, transactions and delivery channels</b> <i>(Note: If Risk Factor 3 is met, developer should rate itself as "high-risk".)</i>		
3	Target median selling price exceeds \$3 million (not applicable for properties whose sale is subject to restrictions under the Residential Properties Act).	
4	Sole/heavy reliance on online platforms for marketing, without physical face-to-face interactions with purchasers	

<b>(III) Profile of developers' higher-risk purchasers</b> <i>(Note: The following risk factors should be considered after project is launched and units sold. If any of the risk factors is met, developer should rate itself as "high-risk".)</i>		
5	≥20% of purchaser are non-Singapore Citizens (e.g. PRs, foreigners, entities and legal arrangements)	
6	Purchasers buying ≥2 properties within 1 year	
7	Purchasers holding multiple travel documents or possess travel documents issued by countries known to offer citizenship and residency by investment (CBI/RBI) programmes or countries flagged FATF	
8	Purchasers originating from or are residents of : a) high-risk countries or jurisdictions subject to a call for action ("FATF black list"); or b) countries or jurisdictions that are subject to increased monitoring ("FATF grey list")	
<b>IV) Other factors considered by developers, e.g. receipt of unrelated third party payments, PEP purchasers</b>		
9	<i>(Developers to list down relevant risk factors)</i>	
<b>V) Overall risk rating</b>		
10	Developer's overall risk level	<b>Low/Medium/High</b>

## Section B: Size of Developer's Business

Developer to state its size of business in the table below

<b>Size of Developer's Business</b>	
Factors considered in determining the size of its business, e.g. gross development value (GDV) of licensed project.	E.g. GDV of licensed project: \$____ mil
Size of business	Small/Medium/Large

## Section C: Risk Mitigating Measures

Measures should be commensurate with the risk level and size of the developer's business.

<b>Risk mitigating measures</b> <i>(Note: these are examples that developers may consider)</i>	
Implement a system of performing CDD and ECDD checks	
Training of staff	<i>State type of training provided, topics covered (e.g. assessed risk level of project), measures put in place to mitigate risk and when is the</i>

	<i>training conducted (e.g. before project launch). Where risk level is assessed to be high, the developer should consider more rigorous training and increase the frequency.</i>
Review of risk analysis	<i>Where risk level is assessed to be high, developers should consider conducting more frequent review and seeking approval level from the highest level for the risk analysis.</i>
Independent auditor to audit CDD and ECDD process, in addition to audit checks on IPPC	<i>Where risk level is assessed to be high, developers should consider increasing the frequency of audit</i>
Review of transactions	<i>Where risk level is assessed to be high, developers should consider conducting more frequent review of transactions</i>

#### Section D: Developer's acknowledgement of risk analysis report

<b>Project Details:</b>	
Name of project	
Name of licensed developer	
Housing Developer Licence No.	
<b>Completed by:</b>	
Name	
Designation	
Date	
<b>Approved by:</b>	
Name	
Designation <i>(Note: The Risk Analysis must be approved by the Senior Management e.g. director or CEO )</i>	
Date	
<b>Date of next review:</b>	
Target date of developer's next risk analysis <i>(Note: The risk analysis should be performed before the launch of each project and updated regularly e.g. once every 2 years, or when material trigger events (e.g. acquisition of new customer segments) occur, whichever is earlier.)</i>	

**CHECKLIST FOR CONDUCTING CUSTOMER DUE DILIGENCE (CDD)****IMPORTANT POINTS TO NOTE:**

1. This checklist guides developers in the conduct of customer due diligence (CDD) to comply with the Housing Developers (Prevention of Money Laundering, Proliferation Financing & Terrorism Financing) Rules and Sale of Commercial Properties (Prevention of Money Laundering, Proliferation Financing and Terrorism Financing) Rules (“the Rules”). Developers are advised to read this checklist in conjunction with the Rules.
2. Developers are required to perform CDD in any of the following circumstances:
  - a. before granting to a purchaser an option to purchase a unit, or before accepting any sum of money (including any booking fee) from a purchaser in relation to the intended purchase, whichever is earlier;
  - b. when a purchaser intends to assign or has assigned to an assignee purchaser all the purchaser’s rights, title and interest, under the Sale and Purchase Agreement (S&PA) made between the purchaser and the developer, and the developer receives written notice from the assignee purchaser requiring the developer to enter into a new S&PA with the assignee purchaser;
  - c. when the developer has reason to suspect that a purchaser is engaging in money laundering (ML), proliferation financing (PF) or terrorism financing (TF);
  - d. when the developer has reason to doubt the veracity or adequacy of information obtained from earlier CDD measures about the same purchaser.
3. Developers must complete the checklist and the relevant forms for each property transaction. Developers may use their own checklist to conduct the CDD but have to ensure that the requirements under the Rules are complied with.

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<b>1. Obtain Purchaser’s Particulars &amp; Verify his/her Identity</b>		
a. Before granting an Option to Purchase (OTP) or before accepting any sum of money (including booking fee) from an intending purchaser or when written notice is received from an assignee	<input type="checkbox"/> Yes <input type="checkbox"/> No	



DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p>purchaser to enter into a new S&amp;PA with the assignee purchaser for sub-sales, have you:</p> <ul style="list-style-type: none"> <li>i. notified the intending purchaser on the documents and information that the developer must obtain to perform the CDD measures and obtained the intending purchaser's or assignee purchaser's written acknowledgement on the receipt of the notice. Refer to <a href="https://go.gov.sg/ura-amltf">https://go.gov.sg/ura-amltf</a> for the documents and information.</li> <li>ii. asked the intending purchaser or assignee purchaser to fill in the <b>Purchaser's Particulars Form (Form A1 for individuals, Form A2 for entities and Form A3 for legal arrangements)</b>?</li> <li>iii. verified the identity of the intending purchaser or assignee purchaser?</li> </ul> <p><i>[Pointer: Developers should verify purchaser's identity by requesting to see and record details of documents such as his NRIC or passport. If the purchaser is unable to produce an original document, developers may consider accepting a copy of the document that is certified to be a true copy by a suitably qualified person (e.g. a notary public, a lawyer or certified public or professional accountant.)]</i></p>		
<p>b. If a person purports to act on behalf of the purchaser, have you:</p> <ul style="list-style-type: none"> <li>i. asked the person to fill in their particulars in <b>Form B on "Details of Person(s) Acting on Behalf of Purchaser"</b>?</li> <li>ii. verified the identity of this person and requested for supporting documents such as letter of authorisation, power of attorney? If the supporting documents are not provided, do not deal with the person and assess if a</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p>Suspicious Transaction Report (STR) should be filed at <a href="https://www.police.gov.sg/sonar">https://www.police.gov.sg/sonar</a>.</p>		
<p>c. If the purchaser is acting on behalf of any other person (known as P), have you:</p> <ul style="list-style-type: none"> <li>i. asked the purchaser to fill in <b>Form D “Details of natural person/entity/legal arrangement on whose behalf the purchaser is acting”</b>;</li> <li>ii. obtain appropriate documentary evidence (such as an authorisation letter or power of attorney) to verify that the purchaser is authorised to act on behalf of P.</li> </ul> <p>If the supporting documents are not provided, do not deal with the person and assess if a Suspicious Transaction Report (STR) should be filed at <a href="https://www.police.gov.sg/sonar">https://www.police.gov.sg/sonar</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	
<p>c. Is the purchaser:</p> <ul style="list-style-type: none"> <li>i. an entity listed on the Singapore Exchange and subject to disclosure requirements by the Singapore Exchange; or</li> <li>ii. a financial institution that is listed in Appendix 1 of the direction known as MAS Notice 626 issued by the Monetary Authority of Singapore; or</li> <li>iii. a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with requirements for the prevention of money laundering, proliferation financing and terrorism financing, consistent with the standards set by the Financial Action Task Force (FATF)?</li> </ul> <p>If yes, you must record the basis for determining that the purchaser falls into one of the categories in (i), (ii) &amp; (iii) above. You are not required to proceed with other Sections of this checklist. You may proceed to sign off this checklist and keep all relevant records of the purchaser.</p> <p>If no, please continue with this checklist.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p><b>2. CONDUCT OF CUSTOMER DUE DILIGENCE (CDD) MEASURES</b></p> <p><i>[Note: In situations where developer have reason to suspect that the transaction relates to ML, PF or TF and believes that performing this measure will tip off the purchaser or any other person, developers may choose not to perform or complete performing this measure. In such situations, developers must not grant the OTP to the purchaser or accept any sum of money (including booking fee) in relation to the purchase or enter into a S&amp;PA with the purchaser or assignee purchaser. The developer must determine whether to file a STR and record the basis of the determination for filing the STR.]</i></p>		
<p><b>2.1. Identification and verification of Beneficial Owner (BO)</b></p> <p><i>[Pointer: In relation to an entity or a legal arrangement, a BO refers to an individual who ultimately owns or controls the entity or legal arrangement, or who exercises ultimate effective control over the entity or legal arrangement, or on whose behalf the transaction is being conducted. Ultimate effective control depends on the ownership structure of the entity or legal arrangement, and may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).]</i></p>		
<p>a. For a purchaser that is an entity or legal arrangement, have you:</p> <ul style="list-style-type: none"> <li>i. determined whether the purchaser has any BO; and</li> <li>ii. ascertained the identity and obtained the identifying information of each BO of the purchaser (Refer to <b>Form C “Details of BO”</b>); and</li> <li>iii. understood the nature of the purchaser’s business, the ownership and control structure of the purchaser, by obtaining the necessary information?</li> </ul> <p><i>[Pointers: The identification of the BO for a purchaser who is an <u>entity</u> would include:</i></p> <p><i>(i) identify each individual (if any) who ultimately has a controlling ownership interest in the purchaser, according to the law and instrument under which the purchaser is constituted;</i></p> <p><i>(ii) if it is doubtful whether all or any of the individuals who ultimately have a controlling interest in the purchaser are its BOs, or where no individual exerts control through ownership interests, to ascertain the identity and obtain the</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p><i>identifying information of each individual (if any) exercising control of the purchaser through other means; and</i></p> <p><i>(iii) where no individual is identified through (i) and (ii), to ascertain the identity and obtain the identifying information of every individual holding a senior management office in the purchaser (e.g. the Director in a company).</i></p> <p><i>The identification of the BO for a purchaser who is a <u>legal arrangement</u> would include:</i></p> <p><i>(i) for trusts – ascertain the identity and obtain the identifying information of the settlor, each trustee(s), the protector (if any), each beneficiary, and any other individual exercising ultimate effective control over the trust;</i></p> <p><i>(ii) for a legal arrangement which is not a trust – ascertain the identity and obtain the identifying information of each person holding a position equivalent or similar to the settlor, trustee, protector, beneficiary or other individual exercising ultimate effective control over the trust.</i></p> <p><i>To understand the nature of the business and the ownership and control structure of the purchaser, you may rely on any of the following information but not limited to:</i></p> <p><i>(i) information provided by the purchaser (e.g. organisation chart);</i></p> <p><i>(ii) information available from the purchaser’s website or published annual reports;</i></p> <p><i>(iii) information available on the purchaser from public sources (e.g. annual returns and filing with the Accounting and Corporate Regulatory Authority (ACRA), ACRA’s business profile);</i></p> <p><i>(iv) information obtained from other reliable sources (e.g. research reports, third party service providers) or other research.]</i></p>		
<p><b>2.2. <u>Politically Exposed Person (PEP)</u></b></p>		

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p>a. Have you checked if any of the relevant person is a PEP, a family member of a PEP or a close associate of a PEP:</p> <p><i>“relevant person” means a purchaser, a beneficial owner of a purchaser, a person (P) on whose behalf a purchaser is acting or a beneficial owner of P.</i></p> <p><i>“politically exposed person” means a domestic politically exposed person, a foreign politically exposed person or an international organisation politically exposed person.</i></p> <p><i>“domestic politically exposed person” means an individual who is or has been entrusted with any prominent public function in Singapore”;</i></p> <p><i>“foreign politically exposed person” means an individual who is or has been entrusted with a prominent public function in a foreign country;</i></p> <p><i>“international organisation politically exposed person” means an individual who is or has been a member of the senior management of an international organisation (including a director, deputy director or member of a board of the international organisation, or an equivalent appointment in the international organisation);</i></p> <p><i>“prominent public function” includes the role held by —</i></p> <p><i>(a) a head of state;</i></p> <p><i>(b) a head of government;</i></p> <p><i>(c) a government minister;</i></p> <p><i>(d) a senior politician;</i></p> <p><i>(e) a senior civil or public servant;</i></p> <p><i>(f) a senior government, judicial or military official;</i></p> <p><i>(g) a senior executive of a state-owned corporation;</i></p> <p><i>(h) a senior political party official; or</i></p> <p><i>(i) a member of the legislature;</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
b. If any of the relevant person is a PEP, or a family member or a close associate of a PEP, have you asked the relevant person to fill in <b>Form E on “Details of PEP”</b> ?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	
2.3. <u>Screening for ML, PF and TF risks</u> a. Have you screened all the relevant persons and persons acting on behalf of the purchaser for ML, PF and TF risks, and completed <b>Form F on “Screening of Purchasers for Money Laundering, Proliferation Financing and Terrorism Financing Risks”</b> ?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
b. In the screening of all the relevant persons and persons acting on behalf of the purchaser, are any of the parties: <ul style="list-style-type: none"> <li>i. a terrorist or terrorist entity under the Terrorism (Suppression of Financing) Act 2002; or</li> <li>ii. a designated person as defined in any regulations made under the United Nations Act 2001; or</li> <li>iii. a person suspected of, or at risk of, facilitating ML, PF or TF who is specified by the Controller in any written notice issued by the Controller?</li> </ul> <p><u>Note:</u> If yes, the developer must not grant an option to purchase any unit to the purchaser, accept any money (including booking fee) from or on behalf of the purchaser, or enter into a S&amp;PA with the purchaser or assignee purchaser, and <b>file a STR</b>. You are not required to proceed with the other Sections in this checklist.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
c. In the screening of all the relevant person and persons acting on behalf of the purchaser, do you suspect that any of the parties is involved in ML, PF or TF?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p><b>Note: File a STR if there are suspicions of ML, PF or TF and seek approval from a person holding senior managerial or executive position in the developer to proceed with the transaction.</b></p>		
<p>2.4. <u>Enhanced Customer Due Diligence Measures</u></p> <p>a. Where the any of the relevant person is:</p> <ul style="list-style-type: none"> <li>i. a foreign PEP, a family member or a close associate of a foreign PEP;</li> <li>ii. a resident of or originates from a relevant country which is a foreign country subject to a call made by the FATF for countermeasures or enhanced customer due diligence measures. Please visit: <a href="https://www.fatf-gafi.org/en/topics/high-risk-and-other-monitored-jurisdictions.html">https://www.fatf-gafi.org/en/topics/high-risk-and-other-monitored-jurisdictions.html</a> for the list of countries;</li> <li>iii. a person that the Controller or other relevant authorities have notified the developer to be of a higher ML/PF/TF risk; or</li> <li>iv. a person (including a domestic or international organisation PEP, a family member or a close associate of a domestic or international organisation PEP), who presents a higher ML/PF/TF risk, as assessed by the developer in Form F.</li> </ul> <p>have you conducted enhanced CDD measures by:</p> <ul style="list-style-type: none"> <li>I. seeking approval from the senior managerial or executive position in the developer to continue with the transaction;</li> <li>II. asking for additional information, e.g. income level, source of funds and source of</li> </ul>	<div> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Not applicable </div>	

DETAILED STEPS AND ACTIVITIES	Tick (✓) accordingly	Remarks
<p>wealth of the relevant person, and corroborating the information;</p> <p>III. ascertaining the identity of a person P on whose behalf the purchaser is acting and obtaining P's identifying information, where the developer suspects that the purchaser is trying to conceal the identity of P;</p> <p>IV. conducting enhanced ongoing monitoring of the transactions entered into with the purchaser to identify suspicious transactions, including transactions that are inconsistent with the purchaser's profile; and</p> <p>V. taking all reasonable measures as are appropriate to the risks of ML, PF or TF in relation to the relevant person.</p> <p>b. Have you implemented appropriate policies, controls and procedures to determine if any of the circumstances mentioned in Qn 2.4a exist?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	

Name and designation of developer's representative who completed the checklist: _____	
Signature: _____	
Date: _____	
<b>The following section is applicable only if the checklist is completed by a Third Party</b>	
Name of person who completed the checklist	
Signature	
Occupation of Third party	<input type="checkbox"/> Salesperson <input type="checkbox"/> Legal professional <input type="checkbox"/> Others (please specify) _____
Company's name	



**PURCHASER'S PARTICULARS FORM FOR NATURAL PERSONS**

**Note: All the information listed in this form must be obtained for all purchasers named in the Option to Purchase or Sale and Purchase Agreement (use additional forms if necessary). The information declared must be true and correct. Documents to verify the information will be requested.**

<b>(A) PURCHASER'S PARTICULARS</b>		
1. Full name of purchaser, including any alias used		
2. Identification number		
3. Type of identification (document must be issued by a government)	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____	
4. Expiry date of identification document, if applicable		
5. Date of birth		
6. Place of birth		
7. Address of usual place of residence		
8. Nationality	Current Nationality: _____ Previous Nationality (if applicable): _____	
9. Occupation		
10. Contact number(s)		
11. Purpose of purchase	<input type="checkbox"/> Owner-Occupation <input type="checkbox"/> Investment/Rental <input type="checkbox"/> Others (Please specify) _____	
12. Are you acting on behalf of another person?	<input type="checkbox"/> Yes Please complete <b>Form D "Details of natural person/entity/legal arrangement on whose behalf the purchaser is acting"</b>	<input type="checkbox"/> No
13. Are you a current or former Politically Exposed Person (PEP)?  <i>("PEP" means an individual who is or has been entrusted with a prominent public function in Singapore, a foreign</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<p>country or an international organisation;</p> <p><i>“prominent public function” includes the role held by:</i></p> <p>(a) a head of state;</p> <p>(b) a head of government;</p> <p>(c) a government minister;</p> <p>(d) a senior politician;</p> <p>(e) a senior civil or public servant;</p> <p>(f) a senior government, judicial or military official;</p> <p>(g) a senior executive of a state-owned corporation;</p> <p>(h) a senior political party official;</p> <p>(i) a member of the legislature; or</p> <p>(j) a member of the senior management of an international organisation (including a director, deputy director or member of a board of the international organisation, or an equivalent appointment in the international organisation)</p>		
<p>14. Are you a family member of a current or former PEP?</p> <p><i>“family member” means a spouse, a child, an adopted child or a stepchild, a sibling, an adopted sibling or a stepsibling or a parent or step-parent, of the PEP.</i></p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>15. Are you a close associate of a current or former PEP?</p> <p><i>“close associate”, means —</i></p> <p>(a) a partner of the PEP;</p> <p>(b) a person accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions or wishes of the PEP;</p> <p>(c) a person whose directions, instructions or wishes the PEP is</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<i>accustomed or under an obligation, whether formal or informal, to act in accordance with; or</i> (d) <i>a person with whom the PEP has an agreement or arrangement, whether oral or in writing and whether express or implied, to act together.</i>		
16. If any of the responses to Qn 13 to 15 is “Yes”, please complete <b>Form E “Details of PEP”</b>		
<b>(B) PURCHASER’S ACKNOWLEDGEMENT</b>		
Name of purchaser:		
Signature:		
Date:		

**PURCHASER'S PARTICULARS FORM FOR ENTITIES**

(e.g. company, limited liability partnership, society)

**Note: All the information listed in this form must be obtained for all purchasers named in the Option to Purchase or Sale and Purchase Agreement (use additional forms if necessary). The information declared must be true and correct. Documents to verify the information will be requested.**

<b>(A) PARTICULARS OF ENTITY</b>	
1. Full name of entity	
2. Identification or registration number	
3. Type of identification (e.g. Business Profile from the Accounting and Corporate Regulatory Authority, any other document issued by any government certifying the incorporation, registration or existence)	
4. Expiry date of identification document (if applicable)	
5. Place of incorporation/ registration	
6. Address of registered office (to indicate as "shared" if it is a shared address)	
7. Address of principal place of business (to be completed if the registered office is not the principal place of business)	
8. Nature of business (e.g. principal activities as stated in ACRA's Business Profile)	
9. Ownership and control structure of entity <i>[Pointer: Information that may be provided:</i> (i) <i>memorandum and articles of association;</i> (ii) <i>information available on the entity's website or published annual reports;</i> (iii) <i>information available on the entity from public sources (e.g. annual returns and filing with the Accounting and Corporate Regulatory Authority (ACRA), ACRA's business profile)]</i>	<i>[To describe]</i>

<p>10. Details of all individuals holding a senior management position (e.g. senior managing directors in a company)</p>	<p><u>Individual 1</u></p> <ul style="list-style-type: none"> <li>• Name, including any alias:</li> <li>• Date of birth:</li> <li>• Place of birth:</li> <li>• Identification no.:</li> <li>• Identification document:</li> <li>• Nationality:</li> <li>• Address of place of residence:</li> <li>• Contact no.:</li> <li>• Position held:</li> </ul> <p><u>Individual 2</u></p> <ul style="list-style-type: none"> <li>• Name, including any alias:</li> <li>• Date of birth:</li> <li>• Place of birth:</li> <li>• Identification no.:</li> <li>• Identification document:</li> <li>• Nationality:</li> <li>• Address of place of residence:</li> <li>• Contact no.:</li> <li>• Position held:</li> </ul>
<p>11. Contact number(s)</p>	
<p>12. Purpose of purchase</p>	<p><input type="checkbox"/> Owner-Occupation  <input type="checkbox"/> Investment/Rental  <input type="checkbox"/> Others (Please specify) _____</p>
<p><b>(B) PARTICULARS OF BENEFICIAL OWNER(S) (BO)</b></p>	
<p>13. Does the entity have any BO?</p> <p><i>BO refers to an individual:</i></p> <p>a) <i>who ultimately owns or controls the entity or legal arrangement;</i></p> <p>b) <i>who exercises ultimate effective control over the entity or legal arrangement; or</i></p> <p>c) <i>on whose behalf the entity or legal arrangement conducts any transaction with a developer.</i></p> <p><i>Ultimate effective control depends on the ownership structure of the entity or legal arrangement. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).</i></p>	<p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p>If “yes”, please complete <b>Form C “Details of BO”</b>.</p>

(C) PURCHASER'S ACKNOWLEDGEMENT	
Name of person acting on behalf of the entity	
Position in the entity	
Signature	
Date	

**PURCHASER'S PARTICULARS FORM FOR LEGAL ARRANGEMENTS**

(e.g. trust)

**Note: All the information listed in this form must be obtained for all purchasers named in the Option to Purchase or Sale and Purchase Agreement (use additional forms if necessary). The information declared must be true and correct. Documents to verify the information will be requested.**

<b>(A) PARTICULARS OF LEGAL ARRANGEMENT</b>	
1. Full name of legal arrangement	
2. Type of legal arrangement	<input type="checkbox"/> Trust <input type="checkbox"/> Others (Please specify) _____
3. Country in which the legal arrangement is constituted	
4. Nature of business	
5. Proof of the legal arrangement's existence	
6. Instrument under which the legal arrangement is constituted e.g. deed of trust	
<b>APPLICABLE WHERE THE LEGAL ARRANGEMENT IS A TRUST</b>	
7. Full name of <u>settlor</u>	
8. Identification number	
9. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
10. Expiry date of identification document (if applicable)	
11. Date of birth	
12. Place of birth	
13. Address of usual place of residence	
14. Nationality	
15. Occupation	
16. Contact number(s)	
17. Full name of <u>trustee(s)</u>	
18. Identification number	
19. Type of identification document	<input type="checkbox"/> NRIC

	<input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
20. Expiry date of identification document, if applicable	
21. Date of birth	
22. Place of birth	
23. Address of usual place of residence	
24. Nationality	
25. Occupation	
26. Contact number(s)	
27. Full name of <b><u>protector</u></b>	
28. Identification number	
29. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
30. Expiry date of identification document (if applicable)	
31. Date of birth	
32. Place of birth	
33. Address of usual place of residence	
34. Nationality	
35. Occupation	
36. Contact number(s)	
37. Full name/class of <b><u>beneficiary (ies)</u></b>	
38. Identification number	
39. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
40. Expiry date of identification document (if applicable)	
41. Date of birth	
42. Place of birth	
43. Address of usual place of residence	
44. Nationality	
45. Occupation	
46. Contact number(s)	



47. Full name of any other person(s) <b><u>exercising ultimate ownership/control over the trust</u></b>	
48. Identification number	
49. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others: (Please specify) _____
50. Expiry date of identification document (if applicable)	
51. Date of birth	
52. Place of birth	
53. Address of usual place of residence	
54. Nationality	
55. Occupation	
56. Contact number(s)	
<b>APPLICABLE WHERE THE LEGAL ARRANGEMENT IS <u>NOT</u> A TRUST</b>	
57. Full name of person holding a position equivalent or similar to a settlor, trustee, protector, beneficiary and any other person exercising ultimate effective control over the trust	
58. Identification number	
59. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others: (Please specify) _____
60. Expiry date of identification document (if applicable)	
61. Date of birth	
62. Place of birth	
63. Address of usual place of residence	
64. Nationality	
65. Occupation	
66. Contact number(s)	
<b>(B) PARTICULARS OF BENEFICIAL OWNER(S) (BO)</b>	
67. Does the legal arrangement have any BO?  <i>BO refers to an individual:</i> <i>a) who ultimately owns or controls the entity or legal arrangement;</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, please complete <b>Form C “Details of BO”</b> .

<p><i>b) who exercises ultimate effective control over the entity or legal arrangement; or</i></p> <p><i>c) on whose behalf the entity or legal arrangement conducts any transaction with a developer.</i></p> <p><i>Ultimate effective control depends on the ownership structure of the entity or legal arrangement. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).</i></p>	
<b>(C) PURCHASER'S ACKNOWLEDGEMENT</b>	
Name of person acting on behalf of the legal arrangement	
Position in legal arrangement	
Signature	
Date	

**DETAILS OF PERSON(S) ACTING ON BEHALF OF PURCHASER***(Use additional forms, if necessary)*

<b>(A) PARTICULARS OF NATURAL PERSON WHO IS ACTING ON BEHALF OF PURCHASER</b>	
1. Full name, including any alias used	
2. Identification number	
3. Type of identification (document must be issued by a government)	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
4. Expiry date of identification document (if applicable)	
5. Date of birth	
6. Place of birth	
7. Address of usual place of residence	
8. Nationality	
9. Occupation	
10. Contact number (s)	
11. Authorisation document, showing that purchaser has authorised the individual to act on the purchaser's behalf (e.g. authorisation letter or Power of Attorney)	

<b>(B) PARTICULARS OF ENTITY WHO IS ACTING ON BEHALF OF PURCHASER</b>	
1. Full Name, including any alias used	
2. Identification or registration number	
3. Type of identification [e.g. Business Profile from the Accounting and Corporate Regulatory Authority (ACRA)]	
4. Expiry date of identification document (if applicable)	
5. Place of incorporation/ registration	
6. Address of registered office (to indicate as “shared” if it is a shared address)	
7. Address of principal place of business (to be completed if the registered office is not the principal place of business)	
8. Nature of business (e.g. principal activities as stated in ACRA’s Business Profile)	
9. Ownership and control structure of entity <i>[pointer: Information that may be provided:</i> (i) memorandum and articles of association; (ii) <i>information available on the entity’s website or published annual reports;</i> (iii) <i>information available on the entity from public sources (e.g. annual returns and filing with ACRA); or</i> (iv) <i>information obtained from other reliable sources (e.g. research reports, third party service providers) or other research.]</i>	<i>[To describe.]</i>
10. Names of all individuals holding a senior management position (e.g. directors of a company, partner and manager of a limited liability partnership, president, treasurer and secretary of a society)	
11. Contact number(s)	
<b>(C) ACKNOWLEDGEMENT</b>	
Name of person(s) purporting to act on behalf of purchaser:	
Signature	
Date:	

**DETAILS OF BENEFICIAL OWNER(S) (BO) OF AN ENTITY OR LEGAL ARRANGEMENT PURCHASER**

<b>(A) PARTICULARS OF BO</b>	
1. Full name, including any alias used	
2. Identification number	
3. Type of identification (document must be issued by a government)	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
4. Expiry date of identification document (if applicable)	
5. Date of birth	
6. Place of birth	
7. Address of usual place of residence	
8. Nationality	
9. Occupation	
10. Contact number(s)	
11. State reason for being a BO (e.g. own xx% of shares of the company)	
12. Is the BO a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
13. Is the BO a family member of a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
14. Is the BO a close associate of a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
15. If any of the responses to Qn 12 to 14 is "Yes", please complete <b>Form E "Details of PEP(s)"</b> .	
<b>(B) BO'S ACKNOWLEDGEMENT</b>	
Name(s) of BO(s):	
Signature:	
Date:	

# **DETAILS OF NATURAL PERSON(S)/ENTITY/LEGAL ARRANGEMENT ON WHOSE BEHALF THE PURCHASER (WHO IS A NATURAL PERSON) IS ACTING**

**Note: Form D must be completed for each and every person, or beneficial owner(s) (BO) of each entity or legal arrangement. Use additional forms if necessary.**

In relation to an entity or a legal arrangement, a BO refers to an individual who ultimately owns or controls the entity or legal arrangement, or who exercises ultimate effective control over the entity or legal arrangement, or on whose behalf the transaction is being conducted.

Ultimate effective control depends on the ownership structure of the entity or legal arrangement. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).

## **(I) WHERE THE PERSON(S) ON WHOSE BEHALF THE PURCHASER IS ACTING, IS A NATURAL PERSON**

<b>(A) PARTICULARS OF NATURAL PERSON</b>	
1. Full name, including any alias used	
2. Identification number	
3. Type of identification (document must be issued by a government)	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
4. Expiry date of identification document (if applicable)	
5. Date of birth	
6. Place of birth	
7. Address of usual place of residence	
8. Nationality	
9. Occupation	
10. Contact number(s)	
11. Authorisation document, showing that the natural person has authorised the purchaser to act on his/her behalf (e.g. authorisation letter or Power of Attorney)	
12. State reason for appointing the purchaser to act on person's own behalf	
13. Is the person on whose behalf the purchaser is acting, a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No

14. Is the person on whose behalf the purchaser is acting, a family member of a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
15. Is the person on whose behalf the purchaser is acting, a close associate of a current or former PEP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
16. If any of the responses to Qn 13 to 15 is "Yes", please complete <b>Form E "Details of PEP(s)"</b> .	
<b>(B) ACKNOWLEDGEMENT FROM NATURAL PERSON ON WHOSE BEHALF PURCHASER IS ACTING</b>	
Name(s) of person on whose behalf the purchaser is acting	
Signature:	
Date:	

\* Delete whichever is inapplicable

**(II) WHERE THE PERSON(S) ON WHOSE BEHALF THE PURCHASER IS ACTING, IS AN ENTITY**

<b>(A) PARTICULARS OF ENTITY</b>	
1. Full name of entity	
2. Identification or registration number	
3. Type of identification (e.g. Business Profile from the Accounting and Corporate Regulatory Authority, any other document issued by any government certifying the incorporation, registration or existence)	
4. Expiry date of identification document (if applicable)	
5. Place of incorporation/ registration	
6. Address of registered office (to indicate as “shared” if it is a shared address)	
7. Address of principal place of business (to be completed if the registered office is not the principal place of business)	
8. Nature of business (e.g. principal activities as stated in ACRA’s Business Profile)	
9. Ownership and control structure of entity <i>[Pointer: Information that may be provided: (iv) memorandum and articles of association; (v) information available on the entity’s website or published annual reports; (vi) information available on the entity from public sources (e.g. annual returns and filing with the Accounting and Corporate Regulatory Authority (ACRA), ACRA’s business profile)]</i>	<i>[To describe]</i>
10. Details of all individuals holding a senior management position (e.g. senior managing directors in a company)	<u>Individual 1</u> <ul style="list-style-type: none"> <li>• Name, including any alias:</li> <li>• Date of birth:</li> <li>• Place of birth:</li> <li>• Identification no.:</li> <li>• Identification document:</li> <li>• Nationality:</li> </ul>



	<ul style="list-style-type: none"> <li>• Address of place of residence:</li> <li>• Contact no.:</li> <li>• Position held:</li> </ul> <p><u>Individual 2</u></p> <ul style="list-style-type: none"> <li>• Name, including any alias:</li> <li>• Date of birth:</li> <li>• Place of birth:</li> <li>• Identification no.:</li> <li>• Identification document:</li> <li>• Nationality:</li> <li>• Address of place of residence:</li> <li>• Contact no.:</li> <li>• Position held:</li> </ul>
11. Contact number(s)	
12. Purpose of purchase	<input type="checkbox"/> Owner-Occupation <input type="checkbox"/> Investment/Rental <input type="checkbox"/> Others (Please specify) _____
13. Authorisation document, showing that the entity has authorised the purchaser to act on its behalf (e.g. authorisation letter or Power of Attorney)	
<b>(B) PARTICULARS OF BENEFICIAL OWNER(S) (BO)</b>	
14. Does the entity have any BO?  <i>BO refers to an individual:</i> d) who ultimately owns or controls the entity or legal arrangement; e) who exercises ultimate effective control over the entity or legal arrangement; or f) on whose behalf the entity or legal arrangement conducts any transaction with a developer.  <i>Ultimate effective control depends on the ownership structure of the entity or legal arrangement. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No  If “yes”, please complete <b>Form C “Details of BO”</b> .
<b>(C) ACKNOWLEDGEMENT FROM ENTITY ON WHOSE BEHALF PURCHASER IS ACTING</b>	
Name of person acting on behalf of the entity	

Position in the entity	
Signature	
Date	

**(III) WHERE THE PERSON(S) ON WHOSE BEHALF THE PURCHASER IS ACTING, IS A LEGAL ARRANGEMENT**

<b>(A) PARTICULARS OF LEGAL ARRANGEMENT</b>	
1. Full name of legal arrangement	
2. Type of legal arrangement	<input type="checkbox"/> Trust <input type="checkbox"/> Others (Please specify) _____
3. Country in which the legal arrangement is constituted	
4. Nature of business	
5. Proof of the legal arrangement's existence	
6. Instrument under which the legal arrangement is constituted e.g. deed of trust	
7. Authorisation document, showing that the legal arrangement has authorised the purchaser to act on its behalf (e.g. authorisation letter or Power of Attorney)	
<b>APPLICABLE WHERE THE LEGAL ARRANGEMENT IS A TRUST</b>	
8. Full name of <u>settlor</u>	
9. Identification number	
10. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
11. Expiry date of identification document (if applicable)	
12. Date of birth	
13. Place of birth	
14. Address of usual place of residence	
15. Nationality	

16. Occupation	
17. Contact number(s)	
18. Full name of <b><u>trustee(s)</u></b>	
19. Identification number	
20. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
21. Expiry date of identification document, if applicable	
22. Date of birth	
23. Place of birth	
24. Address of usual place of residence	
25. Nationality	
26. Occupation	
27. Contact number(s)	
28. Full name of <b><u>protector</u></b>	
29. Identification number	
30. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
31. Expiry date of identification document (if applicable)	
32. Date of birth	
33. Place of birth	
34. Address of usual place of residence	
35. Nationality	
36. Occupation	
37. Contact number(s)	
38. Full name/class of <b><u>beneficiary(ies)</u></b>	
39. Identification number	
40. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others (Please specify) _____
41. Expiry date of identification document (if applicable)	
42. Date of birth	
43. Place of birth	
44. Address of usual place of residence	

45. Nationality	
46. Occupation	
47. Contact number(s)	
48. Full name of any other person(s) <b><u>exercising ultimate ownership/control over the trust</u></b>	
49. Identification number	
50. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others: (Please specify) _____
51. Expiry date of identification document (if applicable)	
52. Date of birth	
53. Place of birth	
54. Address of usual place of residence	
55. Nationality	
56. Occupation	
57. Contact number(s)	
<b>APPLICABLE WHERE THE LEGAL ARRANGEMENT IS <u>NOT</u> A TRUST</b>	
58. Full name of person holding a position equivalent or similar to a settlor, trustee, protector, beneficiary and any other person exercising ultimate effective control over the trust	
59. Identification number	
60. Type of identification document	<input type="checkbox"/> NRIC <input type="checkbox"/> Passport <input type="checkbox"/> Others: (Please specify) _____
61. Expiry date of identification document (if applicable)	
62. Date of birth	
63. Place of birth	
64. Address of usual place of residence	
65. Nationality	
66. Occupation	
67. Contact number(s)	
<b>(B) PARTICULARS OF BENEFICIAL OWNER(S) (BO)</b>	
68. Does the legal arrangement have any BO?	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p><i>BO refers to an individual:</i></p> <ul style="list-style-type: none"> <li><i>d) who ultimately owns or controls the entity or legal arrangement;</i></li> <li><i>e) who exercises ultimate effective control over the entity or legal arrangement; or</i></li> <li><i>f) on whose behalf the entity or legal arrangement conducts any transaction with a developer.</i></li> </ul> <p><i>Ultimate effective control depends on the ownership structure of the entity or legal arrangement. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25% based on FATF recommendations).</i></p>	<p>If yes, please complete <b>Form C “Details of BO”</b>.</p>
<p><b>(C) ACKNOWLEDGEMENT FROM LEGAL ARRANGEMENT ON WHOSE BEHALF PURCHASER IS ACTING</b></p>	
<p>Name of person acting on behalf of the legal arrangement</p>	
<p>Position in legal arrangement</p>	
<p>Signature</p>	
<p>Date</p>	

**DETAILS OF POLITICALLY EXPOSED PERSON(S) (“PEP”)**  
**(Use additional forms if necessary)**

(A) PARTICULARS OF PEP	
I am a:	<p>Please tick the appropriate box:</p> <p> <input type="checkbox"/> Domestic PEP  <input type="checkbox"/> Foreign PEP  <input type="checkbox"/> International Organisation PEP         </p> <p><i>Domestic PEP means an individual who is or has been entrusted with any prominent public function in Singapore;</i></p> <p><i>Foreign PEP means an individual who is or has been entrusted with a prominent public function in a foreign country;</i></p> <p><i>International Organisation PEP means an individual who is or has been a member of the senior management of an international organisation (including a director, deputy director or member of a board of the international organisation, or an equivalent appointment in the international organisation).</i></p> <p><b>Or</b></p> <p>Family member of a:</p> <p> <input type="checkbox"/> Domestic PEP  <input type="checkbox"/> Foreign PEP  <input type="checkbox"/> International Organisation PEP         </p> <p>As a:</p> <p> <input type="checkbox"/> Parent/ step-parent  <input type="checkbox"/> Spouse  <input type="checkbox"/> Child/ adopted child/ step-child  <input type="checkbox"/> Sibling/ adopted sibling/ step-sibling         </p> <p><b>Or</b></p> <p>Close associate<sup>^</sup> of a:</p> <p> <input type="checkbox"/> Domestic PEP  <input type="checkbox"/> Foreign PEP  <input type="checkbox"/> International Organisation PEP         </p> <p>My relationship with the PEP: _____          (please describe)</p> <p><sup>^</sup> Close associate means —          (a) a partner of the PEP ;</p>

	<p>(b) <i>a person accustomed or under an obligation, whether formal or informal, to act in accordance with the directions, instructions or wishes of the PEP ;</i></p> <p>(c) <i>a person whose directions, instructions or wishes the PEP is accustomed or under an obligation, whether formal or informal, to act in accordance with; or</i></p> <p>(d) <i>a person with whom the PEP has an agreement or arrangement, whether oral or in writing and whether express or implied, to act together.</i></p>
Name of PEP/family member/close associate of PEP*, including any alias used	
Name (and description of responsibilities if not self-explanatory from the name) of the prominent public function that the PEP is currently or formerly entrusted with	
Country	
Period of service	From _____ To _____

<b>(B) ACKNOWLEDGEMENT</b>	
Name of PEP/family member/close associate of PEP*:	
Signature:	
Date:	

\* Delete whichever is inapplicable

# **SCREENING OF PURCHASERS FOR MONEY LAUNDERING (ML), PROLIFERATION FINANCING (PF) AND TERRORISM FINANCING (TF) RISKS**

**Note: Developers are required to screen ALL:**

- (a) purchasers named in the Option to Purchase or Sale and Purchase Agreement;**
- (b) BOs of the purchaser(s), where the purchaser(s) is an entity or legal arrangement;**
- (c) natural persons/entity/legal arrangement on whose behalf the purchaser(s) is acting;**
- (d) BOs of the entity/legal arrangement on whose behalf the purchaser(s) is acting;**
- (e) individuals holding senior management position in the entity which has been identified under (b) to (d).**

**(i.e. “persons screened”), whichever is applicable, for ML, PF and TF risks.**

**Use additional forms if necessary.**

<p>1. Do you suspect any of the persons screened is:</p> <p>a. a terrorist or terrorist entity under the First Schedule of the Terrorism (Suppression of Financing) Act?; or</p> <p>b. a designated person as defined in any regulations made under the United Nations Act?; or</p> <p>c. a person suspected of, or at risk of, facilitating ML, PF or TF who is specified by the Controller in any written notice issued by the Controller ?; or</p> <p>d. involved in ML/PF/TF, based on _____ (specify source of information, e.g. Internet search, third party screening database)?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Yes</p> <p>Please state:</p> <p>i. Name of purchaser / person on whose behalf purchaser is acting / BO of</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> No</p>
---	---	---



	<p>purchaser / person acting on behalf / senior management in entity or legal arrangement* of the individual under suspicion:</p> <p>_____</p> <p>ii. Grounds of suspicion (e.g. full name match and same nationality):</p> <p>_____</p> <p><i>[Pointer: For all ML/PF/TF suspicions, developers must file a STR. For (a) to (c), developers must not grant an option to purchase any unit to the purchaser, accept any money (including booking fee) from the purchaser, or enter into a S&amp;PA for a unit with the purchaser or assignee purchaser. For (d), developer must seek approval from a person holding senior managerial or executive position in the developer to proceed with the transaction]</i></p>	
<p>2. Do you suspect any of the persons screened is from a foreign country:</p> <p>a. that the FATF identifies as a foreign country subject to counter measures;</p> <p>b. that the FATF identifies as a foreign country subject to increased monitoring;</p> <p>c. known to have inadequate measures to prevent ML, PF or TF as notified to you, the developer, generally by the Controller or other relevant authorities in Singapore</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> Yes</p> <p>Please state:</p> <p>Name of purchaser / BO of purchaser / person on whose behalf purchaser is acting / person acting on behalf / senior</p>	<p><input type="checkbox"/> No</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> No</p>

	<p>management in entity* under suspicion: _____</p> <p>The foreign country which the individual is from: _____</p>	
3. Do you suspect any of the persons screened is a PEP, family member or a close associate of a PEP?	<input type="checkbox"/> Yes  Please complete <b>Form E</b> <b>"Details of PEP(s)"</b>	<input type="checkbox"/> No
4. Do you suspect any of the persons screened is of higher risk, e.g. linked to adverse news relating to ML, PF or TF?	<input type="checkbox"/> Yes  Please specify the following:  a) Name of purchaser / BO of purchaser / person on whose behalf purchaser is acting / person acting on behalf/ senior management in entity* under suspicion: _____  b) the basis of the determination and source of information: _____	<input type="checkbox"/> No
5. Is the transaction with the purchaser complex or unusually large, or is part of an unusual pattern of transactions which have no apparent economic or visible lawful purpose? <i>[Pointer: Complex transactions include attempts to disguise the BO(s) involved in the transaction, use of unnecessarily complex transaction structures designed to obscure the true nature of the</i>	<input type="checkbox"/> Yes  Please provide the basis of the determination and details of the transaction.	<input type="checkbox"/> No

<p><i>transaction or involving the use of multiple intermediaries for the transaction. Unusually large transactions could include a transaction priced at more than the usual or expected amount for a similar typical transaction. Transactions with no apparent economic or lawful purpose could include using trust and company service providers to set up a number of corporate structures in multiple jurisdictions for the transaction without any apparent purpose]</i></p>		
<b>OVERALL RISK ASSESSMENT</b>		
<p>6. Risk level:</p>	<p><input type="checkbox"/> Higher (if any of the answers to questions 1 to 4 above is “yes”)</p> <p><i>[Pointer: Seek approval from a person holding senior managerial or executive position in the developer to continue with the transaction.]</i></p>	<p><input type="checkbox"/> Lower</p>
<p>7. To proceed with transaction/ continue with the transaction?</p>	<p><input type="checkbox"/> Yes</p> <p>For purchasers assessed to be of higher risk, please attach a copy of the approval document endorsed by the senior management of the company, with the date of approval indicated. The approval document should include the following, in addition to those mentioned in questions 1 to 4 above:</p>	<p><input type="checkbox"/> No</p>

	<p>a. information on income level, source of wealth (SoW) and source of funds (SoF) of the relevant person);</p> <p>b. corroboration of the information obtained in (a) above;</p> <p>c. identifying information of the person on whose behalf the purchaser is acting ("Person P"), where the developer suspects that the purchaser trying to conceal the identity of Person P;</p> <p>d. target date / milestones to conduct <u>enhanced</u> ongoing monitoring of the transaction(s) entered into with the purchaser. Please specify the types of checks to be conducted e.g. income level, SoW, SoF etc.</p>	
8. Is a STR filed?	<input type="checkbox"/> Yes  Please state the basis of the determination	<input type="checkbox"/> No
9. Target date or milestone for <u>ongoing</u> monitoring <i>(Pointer: the target date for ongoing monitoring should be before the target date of issuing the notice of payment for TOP and legal completion, whichever is applicable)</i>	Date/ Milestone: _____  Please complete <b>Form G "Ongoing monitoring of transactions"</b> .	

\* Delete whichever is inapplicable

**Evaluation and Assessment completed by:**

Name and signature of developer's representative: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

**The following section is applicable only if the screening is completed by a Third Party**

Name of Third Party	
Signature	
Occupation of Third party	<input type="checkbox"/> Salesperson <input type="checkbox"/> Legal professional <input type="checkbox"/> Others (Please specify) _____
Company's name	

## ONGOING MONITORING OF TRANSACTIONS

**Note: Ongoing monitoring of transactions are NOT allowed to be conducted by a third party**

1. Are the CDD data, documents and information that were obtained earlier, ascertained to be adequate before issuing the notice of payment for TOP and for completion of sale?	<input type="checkbox"/> Yes	<input type="checkbox"/> No Please provide details and complete a new CDD checklist for the purchaser.  _____ _____
2. Are the transactions by the purchaser consistent with the developer's knowledge of: a. the purchaser; and b. the purchaser's income and risk profile; and c. the purchaser's source(s) of funds.	<input type="checkbox"/> Yes	<input type="checkbox"/> No  Please complete <b>Form F "Screening for money laundering, proliferation financing Risks"</b> again.
3. Risk of money laundering, proliferation financing or terrorism financing remains unchanged	<input type="checkbox"/> Yes	
<p><b>Evaluation and Assessment completed by:</b></p> <p>Name and signature of developer's representative: _____</p> <p>Designation: _____</p> <p>Date: _____</p> <p><i>(Pointer: The form should be completed by the target date set in Form F "Screening of purchasers for money laundering, proliferation financing and terrorism financing risks)</i></p>		