



Overview of Anti-Money Laundering (AML) services

- 1. Sectoral Regulations Governing AML Verifications. Special emphasis on the real estate sector as it encumbers high valuation transactions.**
- 2. Background info – FATF countries, Basel ML/TF risk index world map, golden passport countries. Knowing the double check on Golden passport holder, newly minted PR/SC, and Beneficial Owner.**
- 3. Our database sources – 3 Principal Silos -> In-situ Data, Overreached Data on Foreign Nationals via Member Check, Open Sources.**
- 4. Through Train Services. Including Pre-launch briefing.**
- 5. Connecting the Dots – Deep dive background checks (Data Omnichannel Technology Solution)**
- 6. Checks on Foreign Nationals Purchasers – searches on overseas national databases (120 countries)**
- 7. Operational Solutions – Scheduled & Mandatory checks on TOP, CSC, and Sub-Sale.**
- 8. Risk Analysis Report Sample. Knowledge of AML Advisory for Amber vetting.**
- 9. AML/CFT Policy Governance / Standard Operational Procedure drafting**
- 10. Amicus AML Apps: Key Usage Statistics**
- 11. Our Advisory Team. Updates on regulations & laws, focus areas and maintenance of Regulators Terrorism list.**

Amicus AML Industry Coverage



AML CHECKS - REGULATED BY SECTOR -

Banking & Financial Institutions

- Regulated by MAS

Designated Non-Financial Businesses & Professions (DNFBP)

Lawyers

- Regulated by
- Law Society
 - Singapore Academy of Law

Pawnshops / Remittance Agents

- Regulated by
- MinLaw (Pawnshops)
 - MOF (Remittance Agents)

Precious Stones and Metal Dealers (PSMD)

- Regulated by
- MinLaw

Corporate Secretaries / Incorporators

- Regulated by
- ACRA

- AML checks for
- EDB GIP (\$200m)
 - SFO (\$50m)
 - VCC (\$2m)

Property Developers

- Regulated by
- URA (Controller of Housing; COH)
 - New projects**

- AML checks for
- Onboarding – before issue of Option to Purchase (OTP)
 - Ongoing – Schedule of payment or subsales
 - Offboarding – legal completion)

Property Owners

- Regulated under
- Corruption, Drug Trafficking, and other Serious Crimes Act (CDSA)
 - Rental property**

- AML checks
- Before tenancy agreement or during renewal

Property Agents / Real Estate Salespersons

- Regulated under
- Comply with URA COH / Developer guidelines
 - New sales**

- AML checks
- Customer Due Diligence Forms A – E
 - Consolidated Risk Analysis (COH Guidelines 4.2.2)

- Regulated by
- CEA
 - Resales**
 - Rental property**

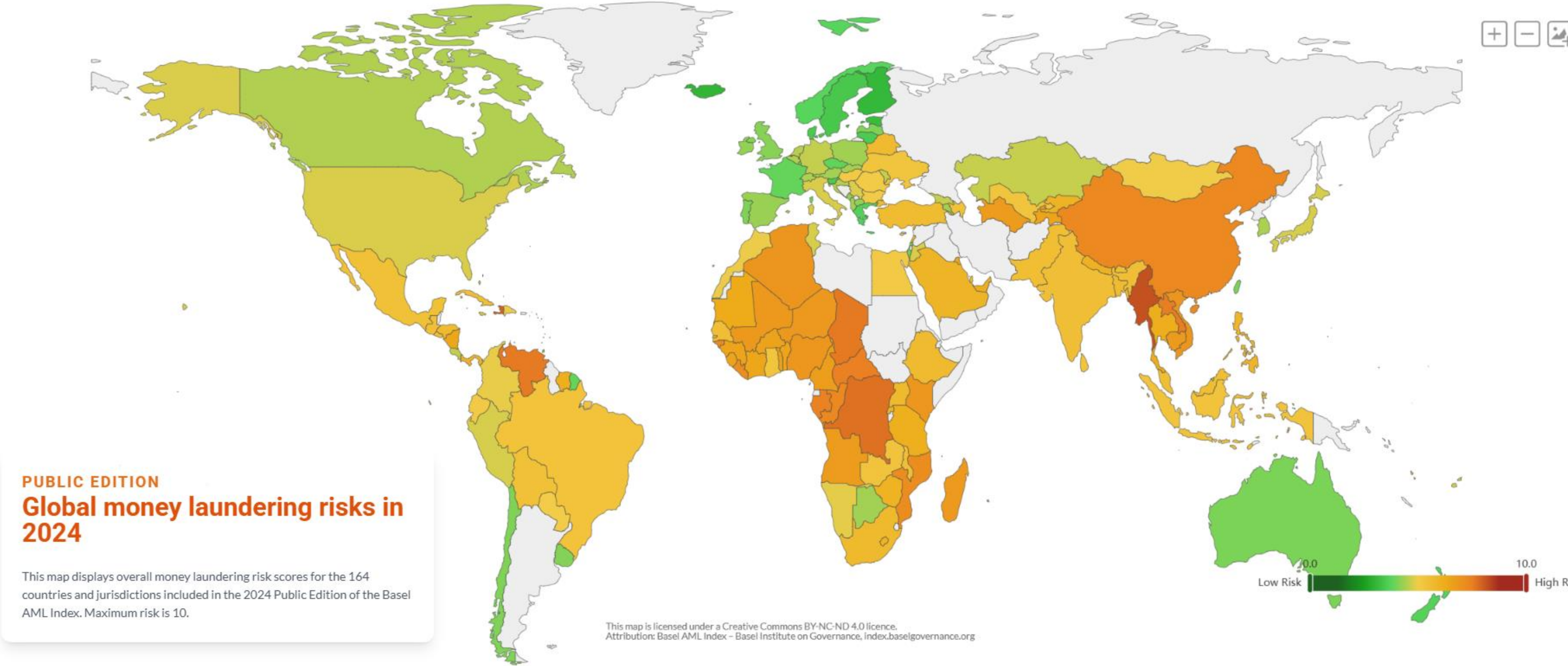
- AML checks for
- Resales
 - Before OTP
 - On legal completion

- AML checks for
- Rental
 - Before tenancy agreement
 - During renewal

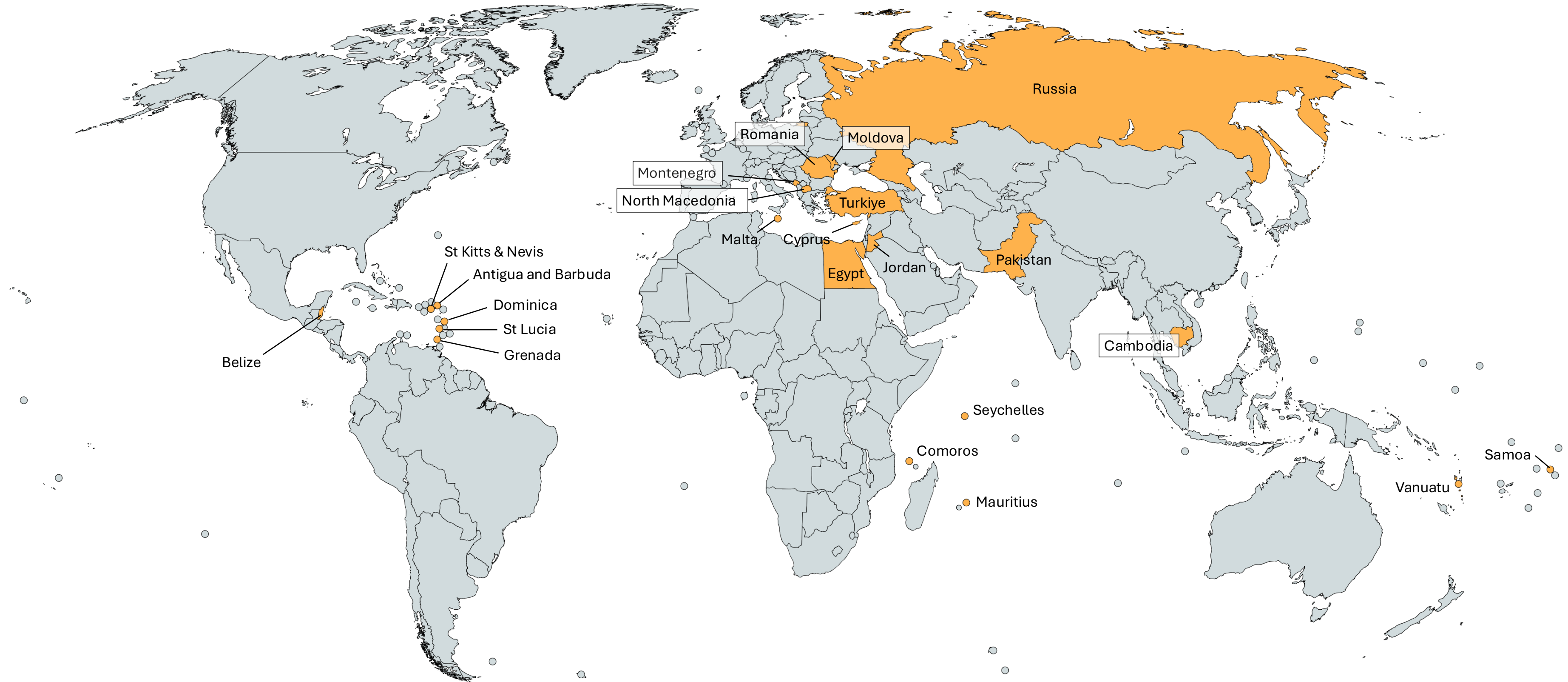
- Other checks
- Women's Charter (Immoral Earnings)



Basel Index for ML/TF Risk



Golden Passport Countries



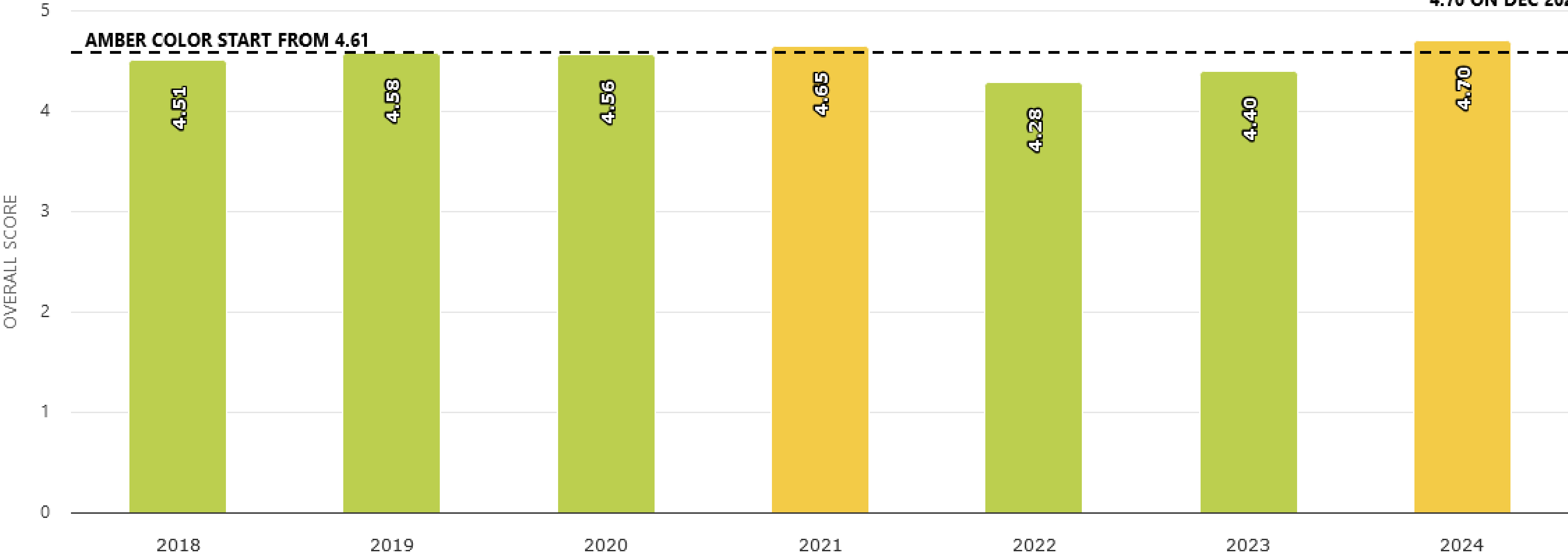
BASEL AML INDEX - SINGAPORE CRITICAL 2025

SOURCE: PUBLIC EDITION OF THE BASEL AML INDEX



4.70 ON DEC 2024

AMBER COLOR START FROM 4.61



Data Lakes Filters

Worldwide & In-Situ Checks Over 1000 Platforms

CDSA

Corruption, Drug Trafficking and Other Serious Crimes
(Confiscation of Benefits) ACT

Silo I

- Singapore Civil Service
- Singapore Government Gazette
- Singapore Inter-Ministry Committee – Terrorist Designation
- Singapore Terrorism (Suppression of Financing) Act (TSOFA)
- Singapore MHA Suspicious Terrorist Alert Lists
- Singapore Investor Alert List
- Singapore Bankruptcy Database
- Singapore Corporate Database
- State Courts Criminal Trials

Suruhanjaya
Pilihan Raya
Malaysia
(SPR)

In-Situ Data Lakes

Silo II

- UN Sanction List
- European External Action Service Consolidated List
- The United Kingdom's Consolidated List Of Targets
- US Denied Persons List
- US Sanction List
- OFAC Consolidated List

Sanction List

- Interpol Red Notices
- Higher Risk Countries (www.fatf-gafi.org)
- Basel Country Risk Meter

High-Risk Data
Flagging

- CIA World Leaders
- World Politically Exposed Person (PEP)
- Council of Europe's Parliamentary Assembly
- World President Database

Politically Exposed
Person
(Foreign PEP)

Silo III

MemberCheck

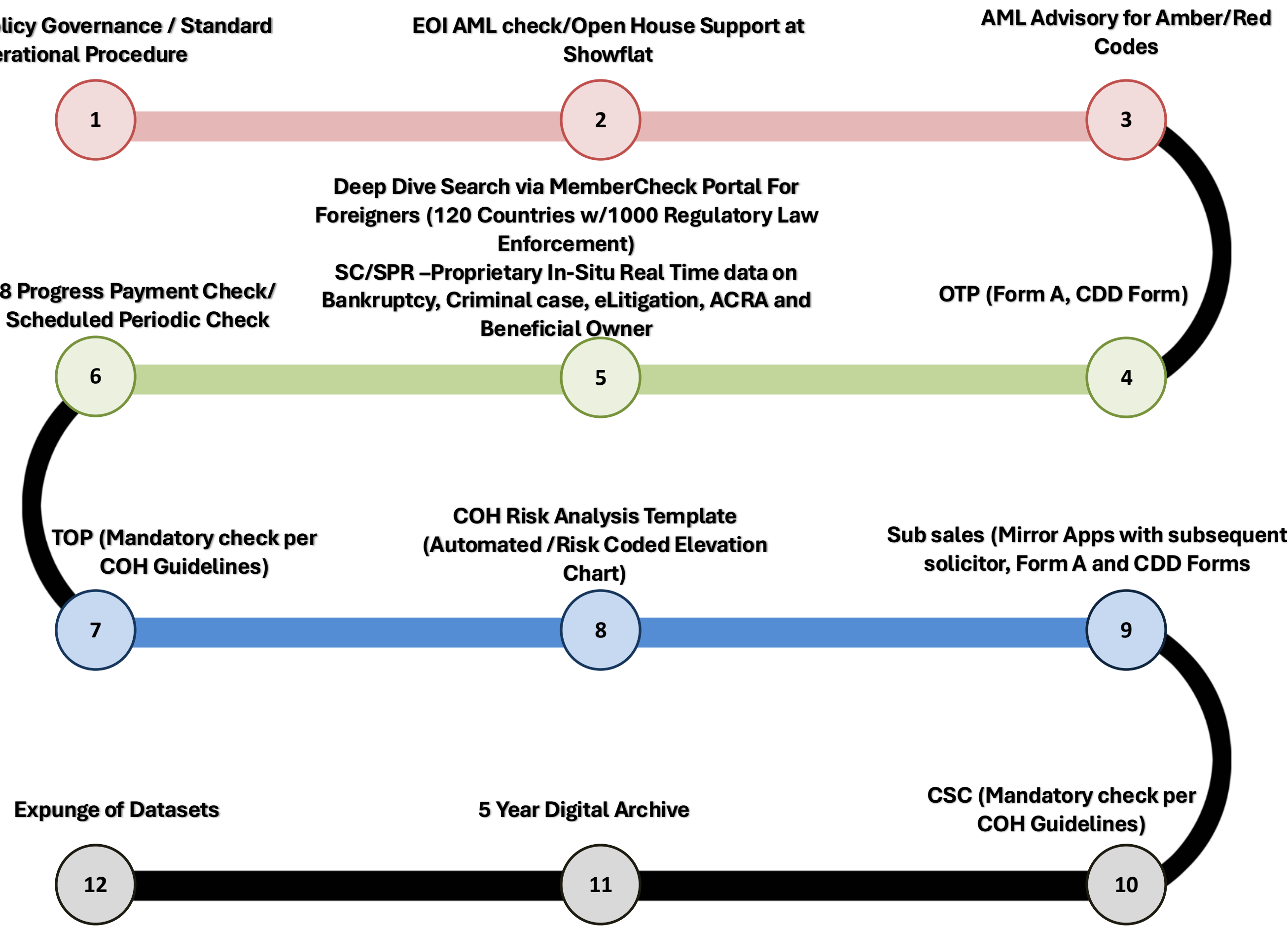
via API
(120 Countries + 1000 platforms)

A
M
L

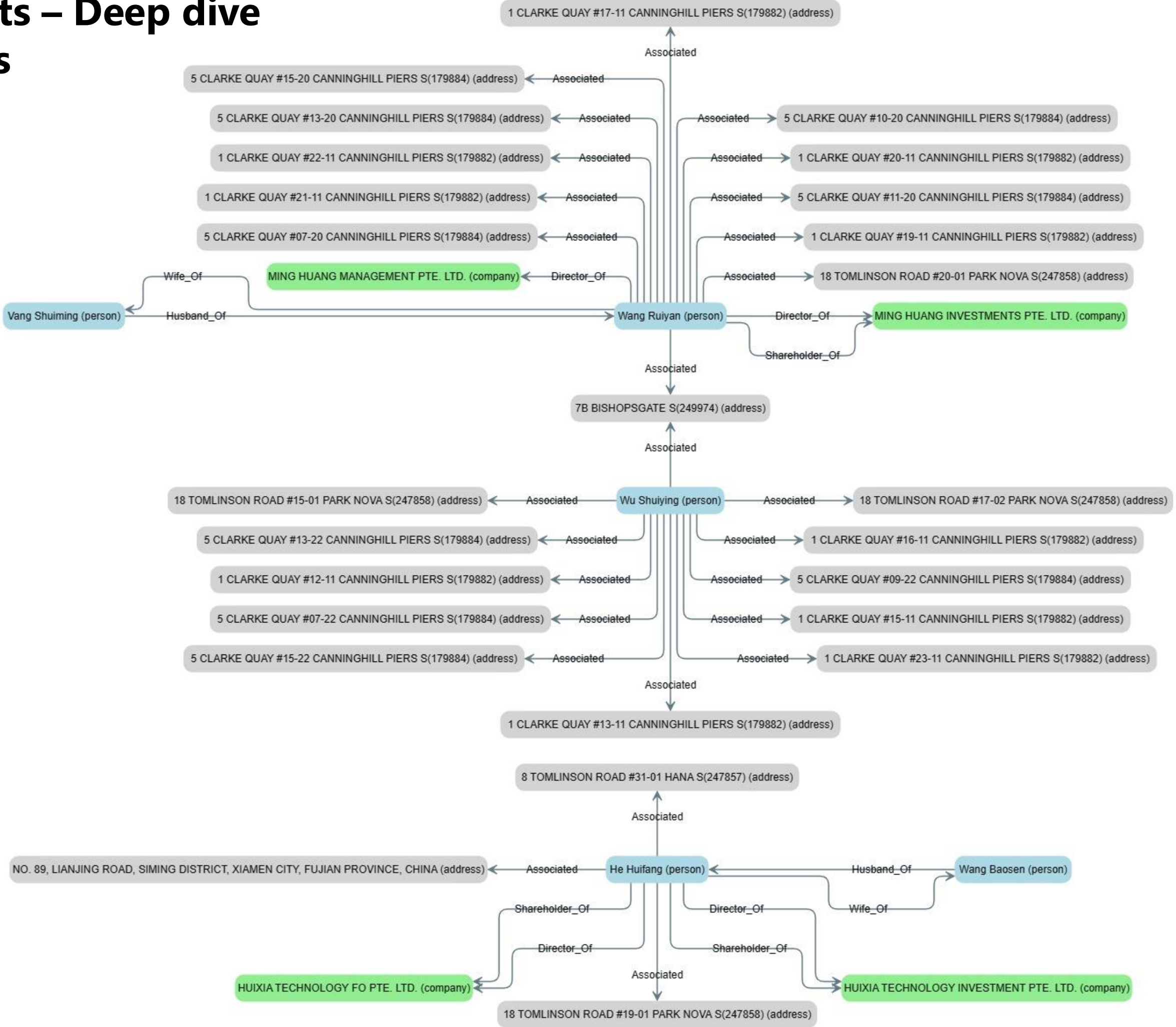
C
F
T

Full report generated in 2-3 minutes

Customized Developer AML App in Accordance with Controller Of Housing Guidelines



Connecting the dots – Deep dive background checks



Connecting the dots – Deep dive background checks



Shophouses owned by companies related CAD Persons of Interest (Ongoing ‘Fujian Gang’ ML case)

Director/ Shareholder	Company	Block	Street	Unit	Postal Code	Transacted Date	Transacted Price	Property Type
CHEN QIUYAN	JINFENG HOLDING PTE. LTD.	198	TELOK AYER STREET	-	068637	2021-04-16	17,380,000.00	SHOP HOUSE
LIN BAOYING	EAGLE77 PTE. LTD.	77	AMOY STREET	-	069896	2020-10-05	29,800,000.00	SHOP HOUSE
SU HAIJIN	AIQINHAI INVESTMENT PTE. LTD.	534	NORTH BRIDGE ROAD	-	188749	2020-10-09	10,000,000.00	SHOP HOUSE
SU HAIJIN		534A		-				SHOP HOUSE
SU HAIJIN		534B		-				SHOP HOUSE
SU JIANFENG	RUNYI INVESTMENT PTE. LTD.	28A	KEONG SAIK ROAD	-	089135	2021-05-20	13,500,000.00	SHOP HOUSE
SU JIANFENG		28B		-				SHOP HOUSE
SU JIANFENG		28		-				SHOP HOUSE

Checks on Foreign Property Purchasers

➤ Malaysia – 16 million data points

Malaysian's Biography Search Engine

Home

Search

Advance Search

BY PERSONAL ID

XXXXXXXX

Search

Search Result

General Dataset List

PERSONAL ID	NAME	CONTACT	AGE	GENDER	ADDRESS	STATUS	NO. OF SEARCH	VIEW
XXXXXXXXX	LEON NYOK HUI	XXXXXX XX	50-YEAR	FEMALE	NO 48 NULL JALAN MUTIARA 7 KM 11 JALAN GOMBAK, TMN MUTIRA GOMBAK GOMBAK 68100 SELANGOR SELANGOR	-	2	VIEW
XXXXXXXXX	LEOW NYOK HUI	XXXXXX XX	50-YEAR	FEMALE	48 NULL JALAN MUTIARA 7 KM 11,JLN GOMBAK TAMAN MUTIARA GOMBAK GOMBAK 53100 WP KUALA LUMPUR KUALA LUMPUR	-	2	VIEW

Personal Dataset List

PERSONAL ID	NAME	CONTACT	AGE	GENDER	ADDRESS	STATUS
XXXXXXXXX	LEOW NYOK HUI	XXXXXXXXX	50-YEAR	FEMALE	7 JALAN GOMBAK (NO GANJIL SAHAJA) KUALA LUMPUR	-

Property Ownership List

PERSONAL ID	NAME	CONTACT	PROJECT	ADDRESS	UNIT	STATE	PTYPE
XXXXXXXXX	LEOW NYOK HUI	XXXXXXXXX	ALAMPURICONDO			KUALA LUMPUR	CONDOMINIUM

Search Result Details

By Name

PERSONAL ID	NAME	CONTACT	AGE	GENDER	ADDRESS	STATUS
XXXXXXXXX	LEON NYOK HUI	XXXXXX X	50-YEAR	FEMALE	NO 48 NULL JALAN MUTIARA 7 KM 11 JALAN GOMBAK, TMN MUTIRA GOMBAK GOMBAK 68100 SELANGOR SELANGOR	-

By Contact Number

PERSONAL ID	NAME	CONTACT	AGE	GENDER	ADDRESS	STATUS
XXXXXXXXX	LEON NYOK HUI	XXXXXX X	50-YEAR	FEMALE	NO 48 NULL JALAN MUTIARA 7 KM 11 JALAN GOMBAK, TMN MUTIRA GOMBAK GOMBAK 68100 SELANGOR SELANGOR	-

By Address

PERSONAL ID	NAME	CONTACT	AGE	GENDER	ADDRESS	STATUS
XXXXXXXXX	LEON NYOK HUI	XXXXXX X	50-YEAR	FEMALE	NO 48 NULL JALAN MUTIARA 7 KM 11 JALAN GOMBAK, TMN MUTIRA GOMBAK GOMBAK 68100 SELANGOR SELANGOR	-

LEGEND FOR AML REPORT

GREEN —————→ No relevant information detected in the checklist items.
However, it is advisable to review Google News for any additional information.

AMBER —————→ Potential matches identified in one or more checklist items.

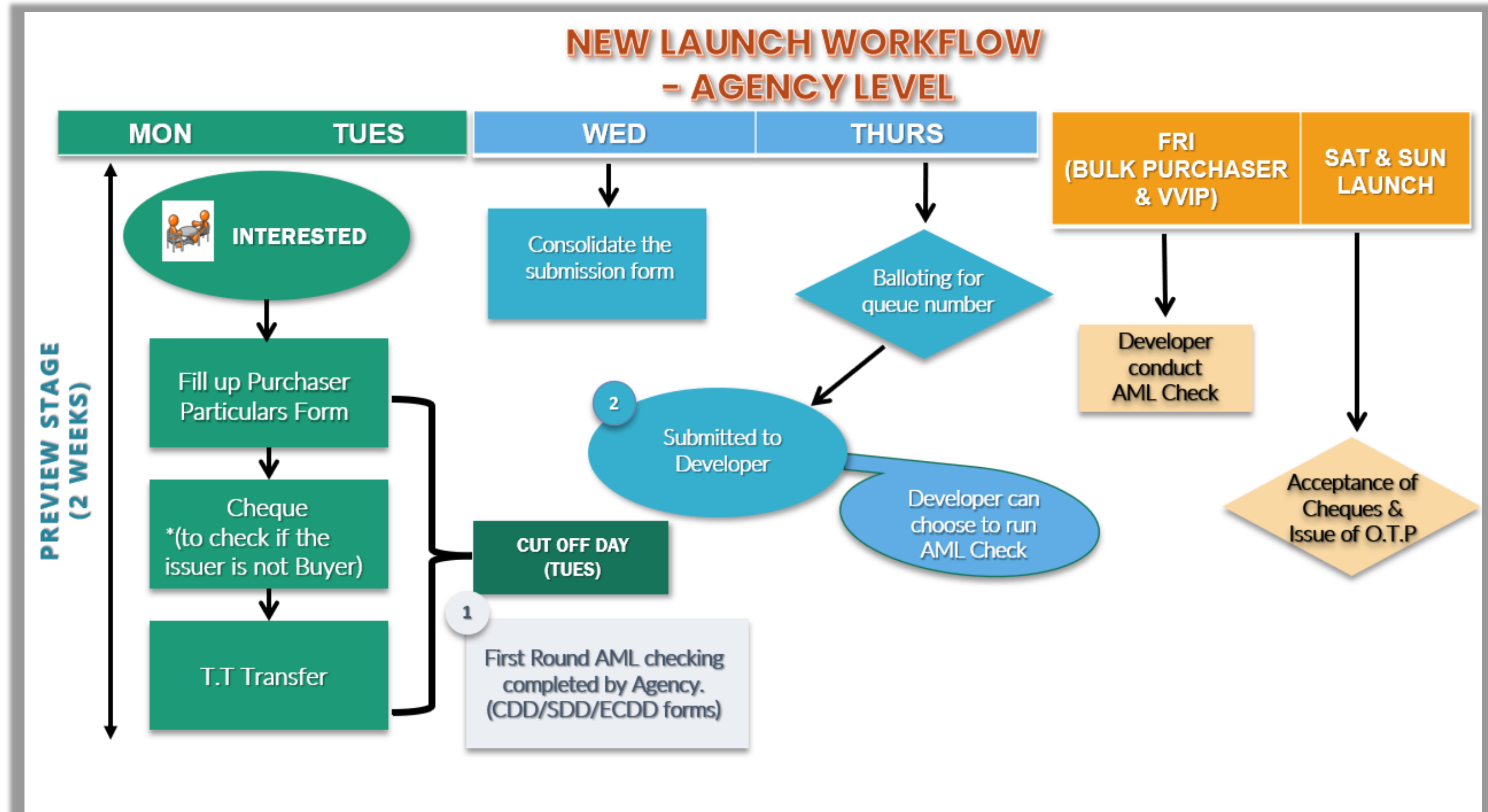
RED —————→ Confirmed matches with a CAD Person of Interest, Associate,
or the company's status is inactive/not live.

***For Amber and Red reports: Further investigation is required to verify the presence of any false positives.**

***The Developer's Compliance Team, KEO and Agents will be notified by email.**

1

Activities Before / Up to Launch Date



Operational Solutions

2

**Participating Agencies / Agents Mirror AML Apps & Excel FTP
(including EOI by purchasers & cheque issuers)**

3

If using BIOS System: Coordination with Alphawave

4

Streamline AML Form e-signature

5

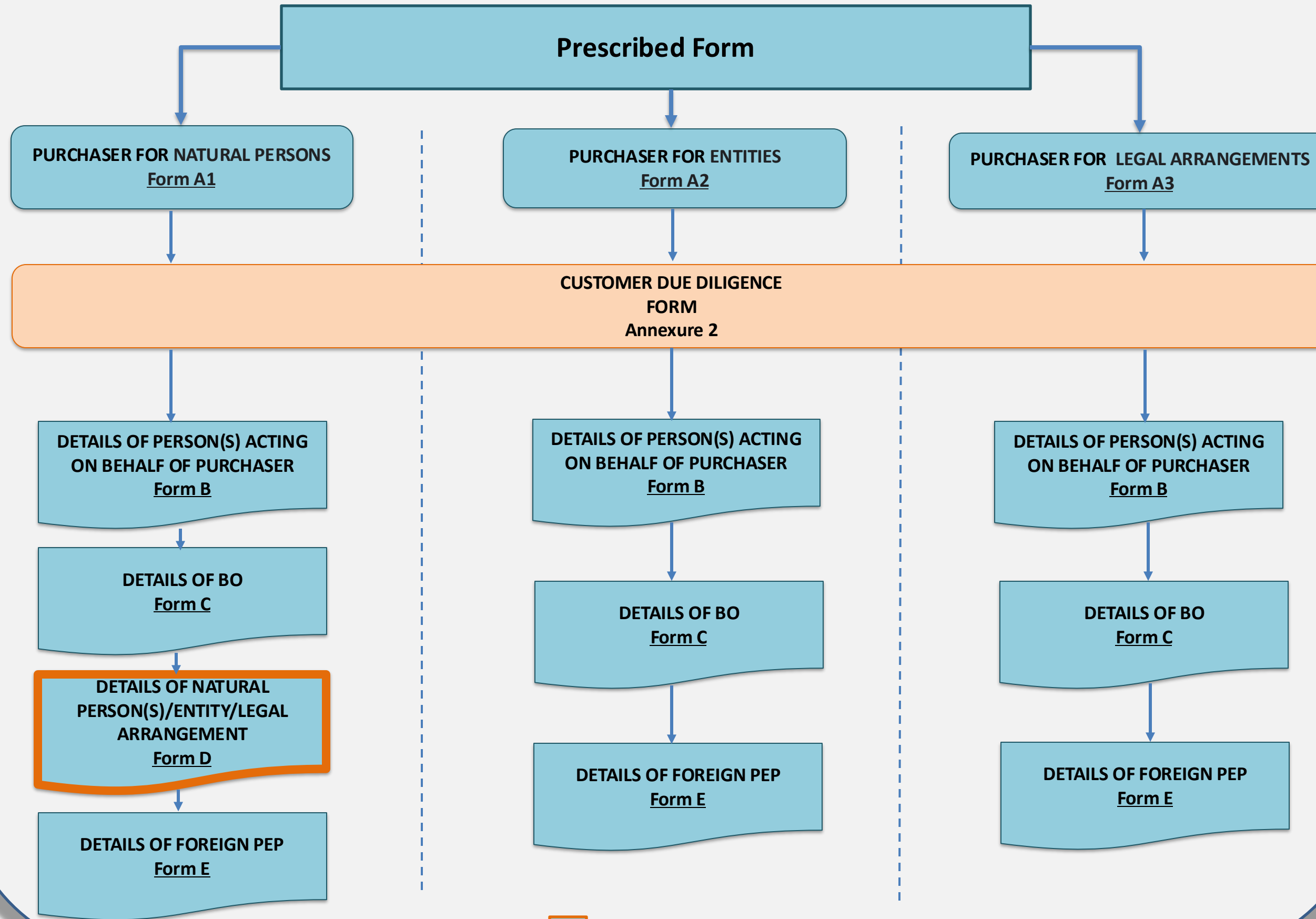
Ongoing / Payment Trigger Checks



- a. TOP
- b. CSC
- c. Legal Completion
- d. Sub-sale
- e. Yearly COC monitoring
- f. 2 years Consolidated Risk Management Dashboard

Revised Forms Pursuant to COH Guidelines Dated 21 January 2025

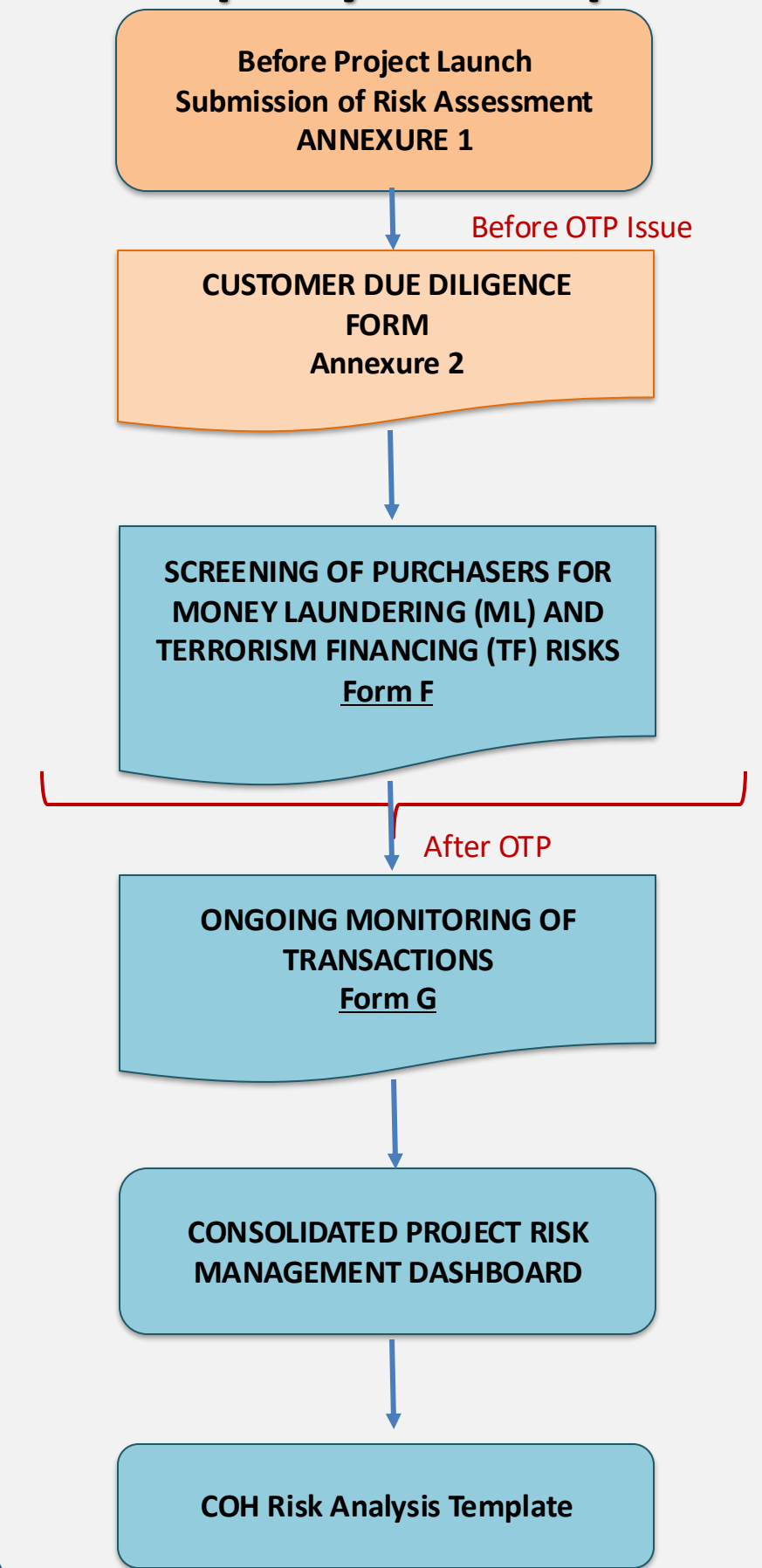
Property Developer Staff/Agent/Agencies



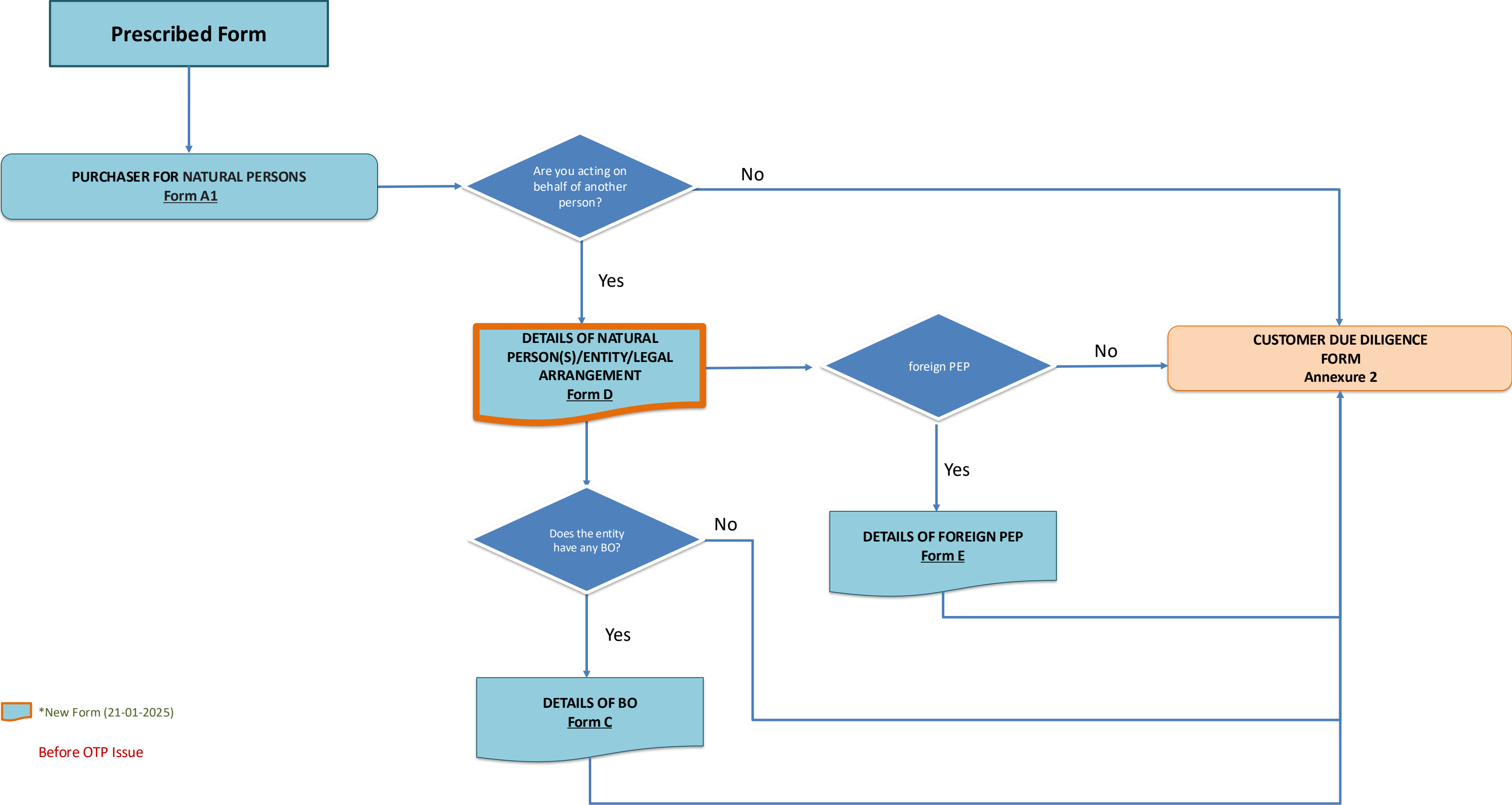
 *New Form (21-01-2025)

Before OTP Issue

Property Developer



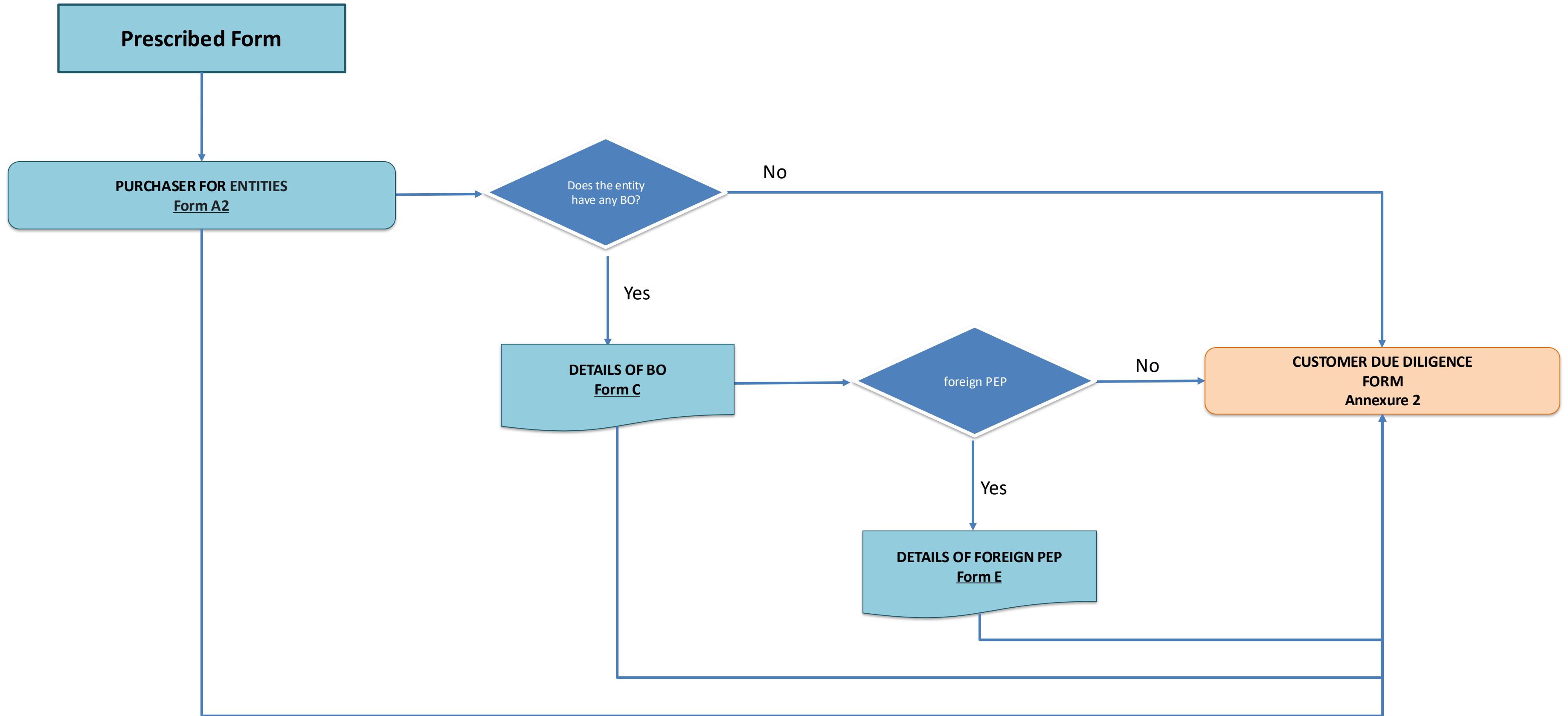
PURCHASER’S PARTICULARS FORM FOR NATURAL PERSONS - A1



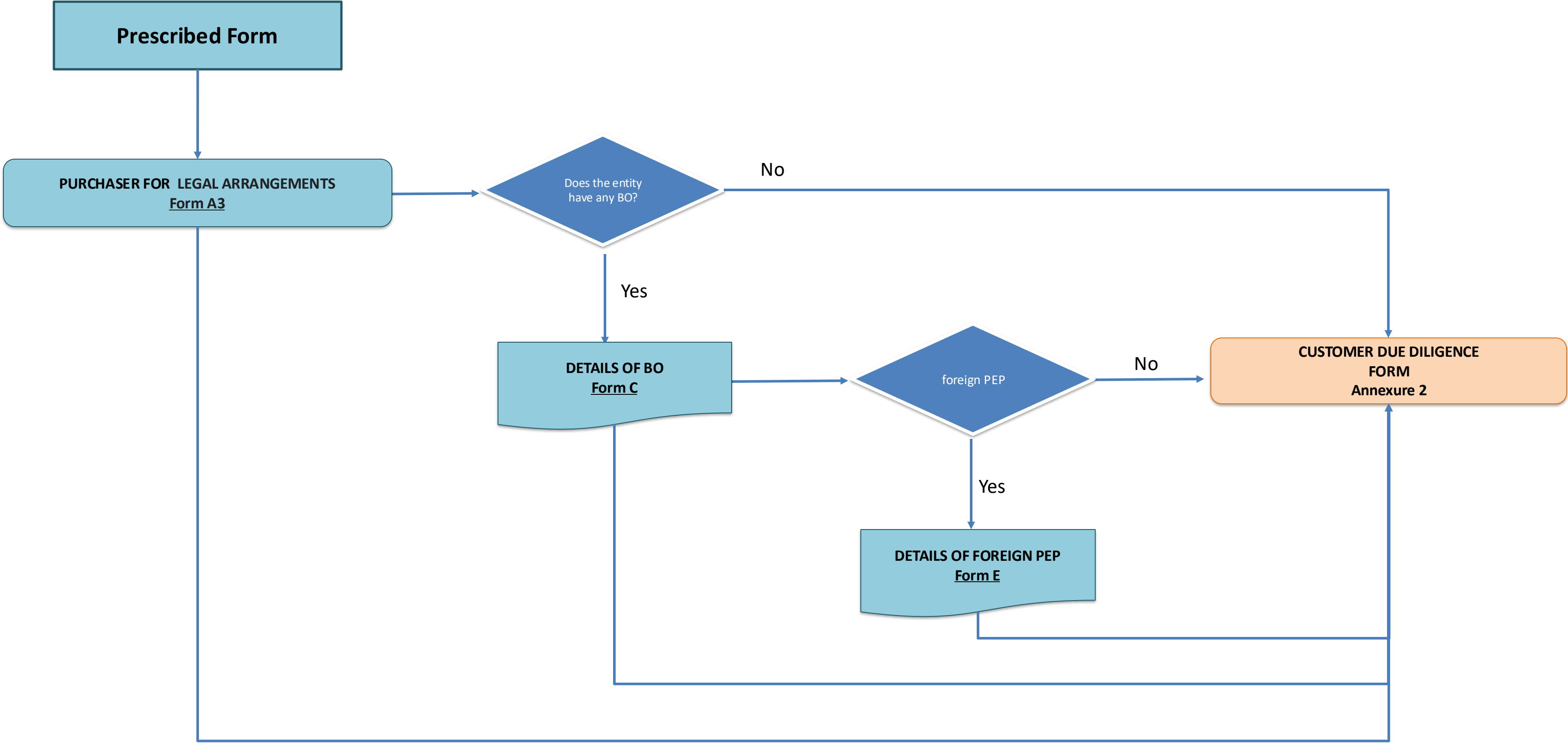
 *New Form (21-01-2025)

Before OTP Issue

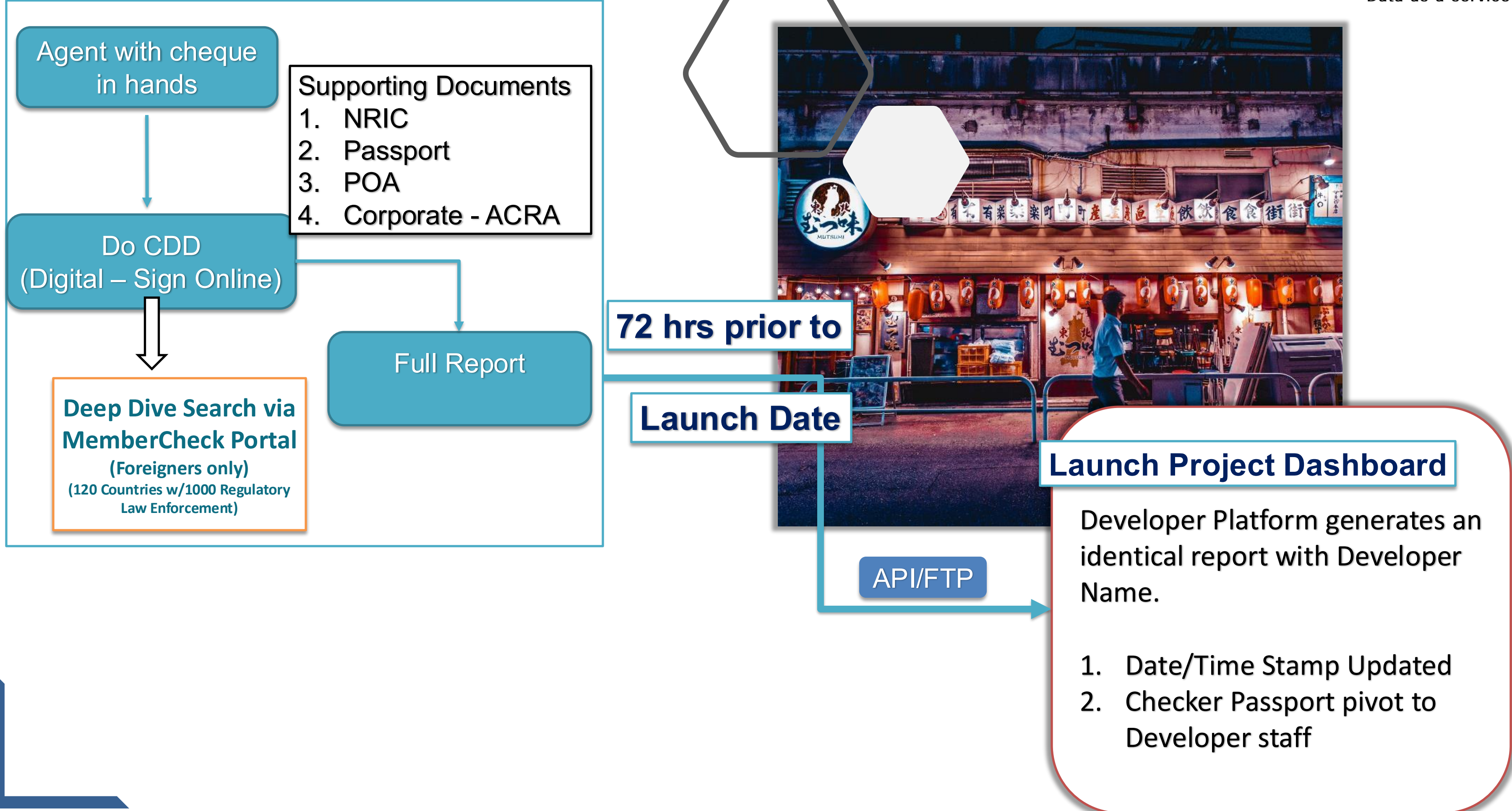
PURCHASER'S PARTICULARS FORM FOR ENTITIES - A2



PURCHASER’S PARTICULARS FORM FOR LEGAL ARRANGEMENTS - A3



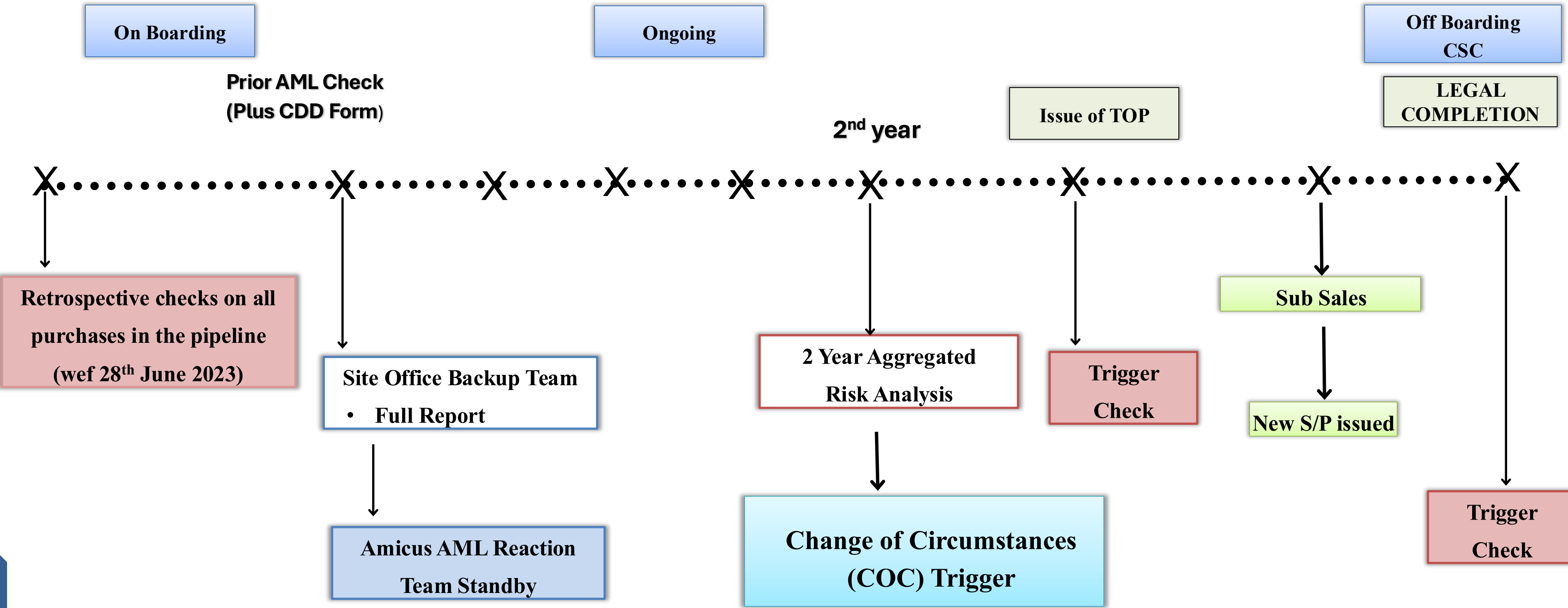
Developers AML Apps Mirror (for Agents)



Condominiums / Projects Under Construction

(2 – 3 years Ongoing Checks + 5 years Data Archive)

8 Progress Payment Schedules



1 5 years of record maintenance after Legal Completion

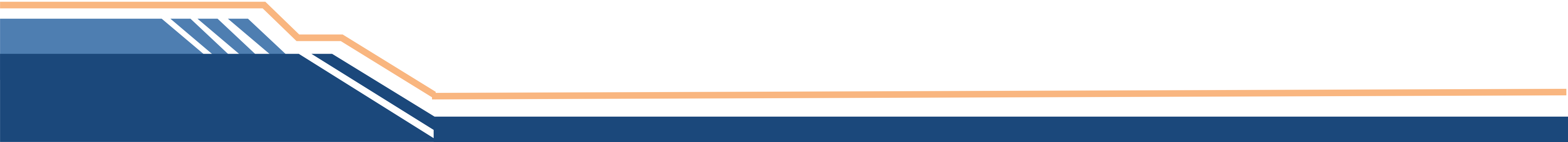
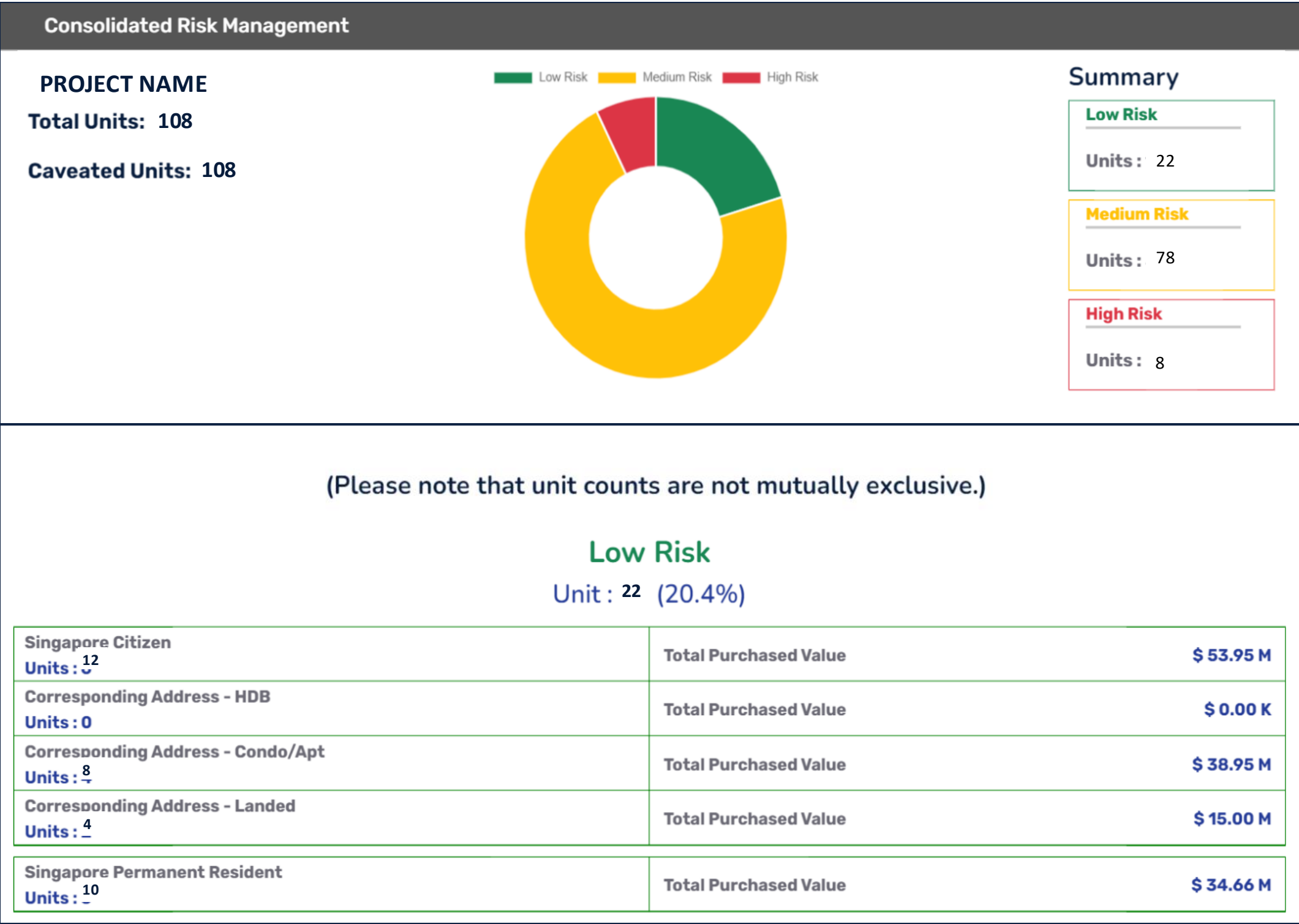
SUPPORT SERVICES

1 Standby Team on Launch Day

2 Training of Staff – 3 times a year

3 Call assistance for suspicious cases. Check on Background Deep Dive Engine (Fishbone)

Risk Analysis Report Sample



Medium Risk

Unit : 78 (72.2%)

Other Nationalities Units : 74	CHINA Total Purchased Value	Units : 46 \$ 261.26 M
	INDONESIA Total Purchased Value	Units : 2 \$ 10.10 M
	Other Countries Total Purchased Value	Units : 26 \$ 129.49 M
Relevant Countries (FATF Country)	TURKEY Total Purchased Value	Units : 2 \$ 26.03 M
Cambodia/ Golden Passport Holders Units : 2	Total Purchased Value	\$ 13.65 M
Companies (Legal Entities) Units : 0	Total Purchased Value	\$ 0.00 K
Legal Arrangement Units : 24	Trust	Units : 24
	Power Of Attorney (POA)	Units : 0
On Behalf Of		Units : 0

High Risk

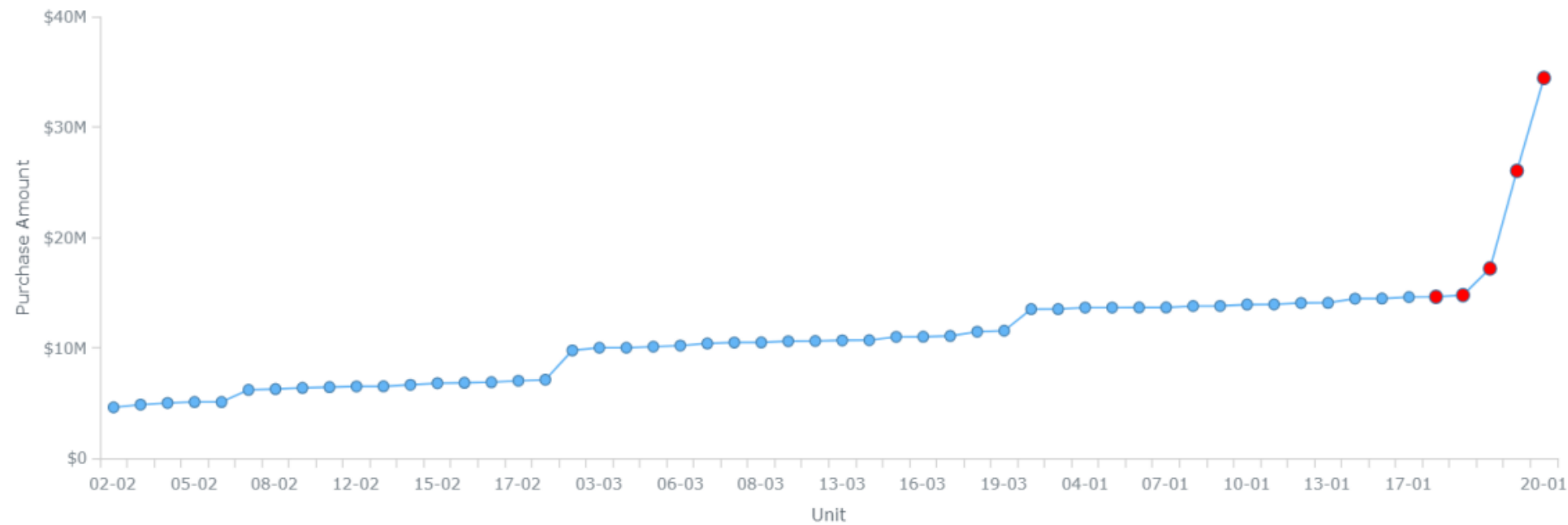
Unit : 8 (7.4%)

CAD Person of Interest Units : 8	Total Purchased Value	\$ 70.66 M
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CHECK LIST SUMMARY

INTERPOL RED NOTICES	0	BANKRUPTCY PROCEEDING/ORDER	0
UN SANCTION LIST	0	SINGLE BUYER OF MULTI UNITS (FOR THIS PROJECT)	6
FOREIGN POLITICALLY EXPOSED PERSON	0	LEGAL ENTITY	0
FATF DESIGNATED COUNTRY	1		

Number of Transactions sold in PROJECT NAME



Number of transactions	54	Number of Top Decile transactions	5	Percentage of Top Decile transactions	9%
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Details of Top Decile Transactions

Address	Amount
#20-01	\$34,438,000
#20-03	\$26,026,000
#20-02	\$17,178,000
#19-01	\$14,768,000
#18-01	\$14,618,000

Number of Top Decile Transactions in 2023

Number of transactions in 2023	10	Number of Top Decile transactions	1	Percentage of Top Decile transactions	10%
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Details of Top Decile Transactions

Address	Amount
#13-02	\$6,646,000

*If the number of records in the top decile exceeds 15, only 15 records will be displayed in the table.

Number of Top Decile Transactions in 2022

Number of transactions in 2022	14	Number of Top Decile transactions	1	Percentage of Top Decile transactions	7%
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Details of Top Decile Transactions

Address	Amount
#04-01	\$13,635,000

Number of Top Decile Transactions in 2021

Number of transactions in 2021	45	Number of Top Decile transactions	4	Percentage of Top Decile transactions	9%
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Details of Top Decile Transactions

Address	Amount
#20-01	\$34,438,000
#20-03	\$26,026,000
#20-02	\$17,178,000
#19-01	\$14,768,000

Annex H: Estate Agent’s Checklist on Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT)

Important points to note:

1. This checklist serves to guide the estate agent (EA) to comply with the requirements of the Estate Agents (Prevention of Money Laundering and Financing of Terrorism) Regulations 2021.
2. The pointers in this checklist are suggested courses of action that the EA may take. They are not intended to be exhaustive and the EA should take additional actions that may be necessary and applicable to its business. The EA can choose to adopt the pointers or consider alternative measures that suit the needs of its business in complying with the Regulations.
3. The EA is advised to conduct self-assessments using this checklist periodically. When CEA conducts inspection of the EA on compliance with the Regulations, the EA is required to complete and submit this checklist to CEA.
4. In the "Elaboration" column of the checklist, the EA should provide a brief description with details of what it has done where necessary and include all relevant supporting documents if so required.
5. The EA is required to develop and implement risk sensitive internal policies, procedures and controls relating to the following matters to manage and effectively mitigate ML/TF risks:
 - a) Risk assessment and mitigation;
 - b) CDD procedures (including enhanced CDD measures and CDD for rental transactions) and ongoing monitoring (including enhanced ongoing monitoring), suspicious transaction reporting and tipping off;
 - c) Communication and monitoring implementation of the internal policies, procedures and controls;
 - d) Compliance management arrangements; and
 - e) Record-keeping.
6. The checklist should be completed by the Key Executive Officer (KEO) or a person authorised by the EA.
7. All information/documents provided must be true, accurate, current and complete as at the time of submission.

S/N	Criteria	Tick (✓)	Elaboration (if any)
Section 1: Identification, Mitigation and Documentation of Risks			
1.1	<p>Did your EA analyse its past property transactions to assess the risks of money laundering (ML) and terrorist financing (TF) in the transactions it facilitated? If yes, please elaborate on the risk analysis performed <u>and</u> the frequency of the analysis in the "Elaboration" column.</p> <p><i>Pointer: Your EA may consider using the suggested template in Annex H1 as a guide on how to analyse the past transactions.</i></p>	<div><input type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div>	
1.2	<p>From the risk analysis of past property transactions, what are the types of higher risk transactions that your EA will look out for? Please list the types of higher risk transactions in the "Elaboration" column.</p> <p><i>Pointer: Transactions of higher risk could include those involving foreigners including Singapore Permanent Residents, transactions of higher monetary value (e.g. S\$3million or higher), or where physical cash is used. Your EA should also consider news and typologies of ML/TF in the estate agency trade or industry provided in CEA's circulars and notices to EAs.</i></p>		
1.3	<p>Did your EA take any measure to mitigate the potential risks posed by higher risk property transactions? If yes, please provide the details in the "Elaboration" column.</p> <p><i>Pointer: Your EA may consider more frequent monitoring of such transactions.</i></p>	<div><input type="checkbox"/> Yes</div> <div><input type="checkbox"/> No</div>	

- **Extracted from CEA’s Guide on Estate Agents (Prevention of Money Laundering and Financing of Terrorism) Regulations (version as of 18 Mar 2022)**

Annex H1: Suggested Template for Risk Assessment

This template serves to guide estate agents (EAs) in analysing their past property transactions for the conduct of risk analysis. The EA can choose to adopt the tables and criteria or have its own methodology for conducting the required risk analysis, which best suits its business needs.

This guide helps the EA to understand the nature of its transactions and hence the types of transactions that may pose a higher ML/TF risk , so that the appropriate steps to mitigate the risks can be put in place. It includes both sale and lease transactions, as ML/TF may be unwittingly facilitated by the EA and/or its RESs through these transactions.

The tables and criteria, including review of data over past 3 years and the values of S\$3 million, 3 properties and S\$10,000, are suggested figures. They serve as a guide to help the EA identify potential higher risk transactions.

For Sale and Purchase Transactions: Tables 1 and 2

- 1. "Total Transaction Value" refers to total value of property sales and purchases transacted in a specified year.
- 2. "Physical cash" refers to transactions in which physical cash were used (e.g. for payment of the option fee). Cheques and cashier orders are not considered physical cash for this purpose.
- 3. "S\$3 million or higher" refers to those transactions in which the property had been transacted at S\$3 million or higher.
- 4. "3 or more properties" refers to the transactions in which an individual or a corporate or business entity had transacted 3 or more properties for that year
- 5. "Number of sales and purchases" in Table 2 includes information of transactions involving both sellers and buyers.
- 6. "Foreigners" includes Singapore Permanent Residents.

Table 1 – Overview of Sale and Purchase Transactions for Past 3 Years

Year	Number of Transactions	Total Transaction Value (S\$)
20XX		
20XX		
20XX		

Table 2 – Details of Sale and Purchase Transactions in 20XX (One table for each year)

				Local			Foreign
				Residential	Commercial	Industrial	
Number of sales and purchases	By individuals	Local	Physical cash				
			S\$3 million or higher				
			3 or more properties				
		Foreigners	Physical cash				
			S\$3 million or higher				
			3 or more properties				
	By entities	Local	Physical cash				
			S\$3 million or higher				
			3 or more properties				
		Foreign	Physical cash				
			S\$3 million or higher				
			3 or more properties				

For Lease Transactions: Tables 3 and 4

- 1. "Annual Rental Value" refers to the annual value of the lease (monthly rental amount multiplied by 12) transacted in a specified year.
- 2. "S\$10,000 or higher" refers to the transactions in which the property had been leased for a monthly rental value of S\$10,000 or higher.
- 3. "3 or more properties" refers to the transactions in which an individual or a corporate or business entity had transacted 3 or more properties for that year
- 4. "Number of leases" in Table 4 includes information of transactions involving both tenants and landlords.
- 5. "Foreigners" includes Singapore Permanent Residents

Table 3 – Overview of Lease Transactions for Past 3 Years

Year	Number of Transactions	Annual Rental Value (S\$)
20XX		
20XX		
20XX		

Table 4 – Details of Lease Transactions in 20XX (One table for each year)

				Residential	Commercial	Industrial
Number of leases	By individuals	Local	S\$10,000 or higher			
			3 or more properties			
		Foreigners	S\$10,000 or higher			
			3 or more properties			
	By entities	Local	S\$10,000 or higher			
			3 or more properties			
		Foreign	S\$10,000 or higher			
			3 or more properties			

AML/CFT POLICY GOVERNANCE / STANDARD OPERATIONAL PROCEDURE

1. **We will assist to draft PG / SOP at Singapore Dollars Five Thousand (\$5,000.00). One Time fees. Plus 1 free Amendment should URA / COH issue a Supplemented Guideline.**
2. **This document will include:**
 - a. Organisation Chart
 - b. Line of Reporting
 - c. Use of CorpPass to alert CAD
 - d. Red Alert
 - e. PDPA Issues
 - f. Cyber Security
 - g. Need to know – Tool Deck / Digital Fingerprint
 - h. Amicus Legal Team to assist

AML/CFT POLICY GOVERNANCE / STANDARD OPERATIONAL PROCEDURE



ANTI-MONEY LAUNDERING/COMBATING THE FINANCING OF TERRORISM (AML/CFT) POLICY GOVERNANCE & STANDARD OPERATIONAL PROCEDURE MANUAL

Table of Contents

- 1.0 Introduction
- 2.0 Objectives
- 3.0 Scope Of AML/CTF
- 4.0 Purpose of the Policy
- 5.0 Policy Statement
- 6.0 Overview of Compliance Framework
- 7.0 AML/CFT Compliance Structure
- 8.0 Organization Structure
- 9.0 Compliance Responsibilities
- 10.0 Risk Assessment Framework
- 11.0 Foreign Politically Exposed Persons
- 12.0 Trusts
- 13.0 High-Risk Geographic Locations
- 14.0 Suspicious Transaction Report
- 15.0 Customer Identification – Unique Identifier (NRIC) & Name Match
- 16.0 Customer Due Diligence (CDD)
- 17. 0 Customer Due Diligence (CDD) Process Flow
- 18. 0 Enhanced Customer Due Diligence (ECDD)
- 19. 0 Enhanced Customer Due Diligence (ECDD) Process Flow
- 20. 0 Record Keeping
- 21. 0 Training Program
- 22. 0 Consequences of Non-compliance

Note: 13 Developers signed up for the Governance Policy & SOP

- **23,789** unique users
- **116** KEOs
- **627,959** total AML checks since 2021

- **27** developers with **41** projects

Developers We Proudly Serve



Developers We Proudly Serve



L.K. Ang Construction
Pte Ltd



NNB 8 Development
Pte Ltd



Mandai Estate Development
Pte Ltd

USB (Phoenix) Pte Ltd

HUSSO REALTY

Real Estate Agencies We Proudly Serve



Real Estate Agencies We Proudly Serve



FER PROPERTIES PTE LTD

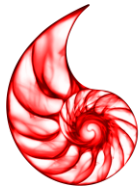
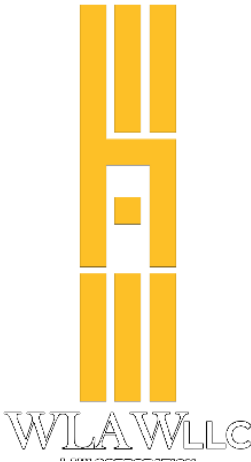
LAND EL-HOME PTE. LTD.

LANDVIN PTE. LTD.



SRE PRIVATE LIMITED

Law Firms We Proudly Serve



CrimsonLogic
A member of the PSA Group

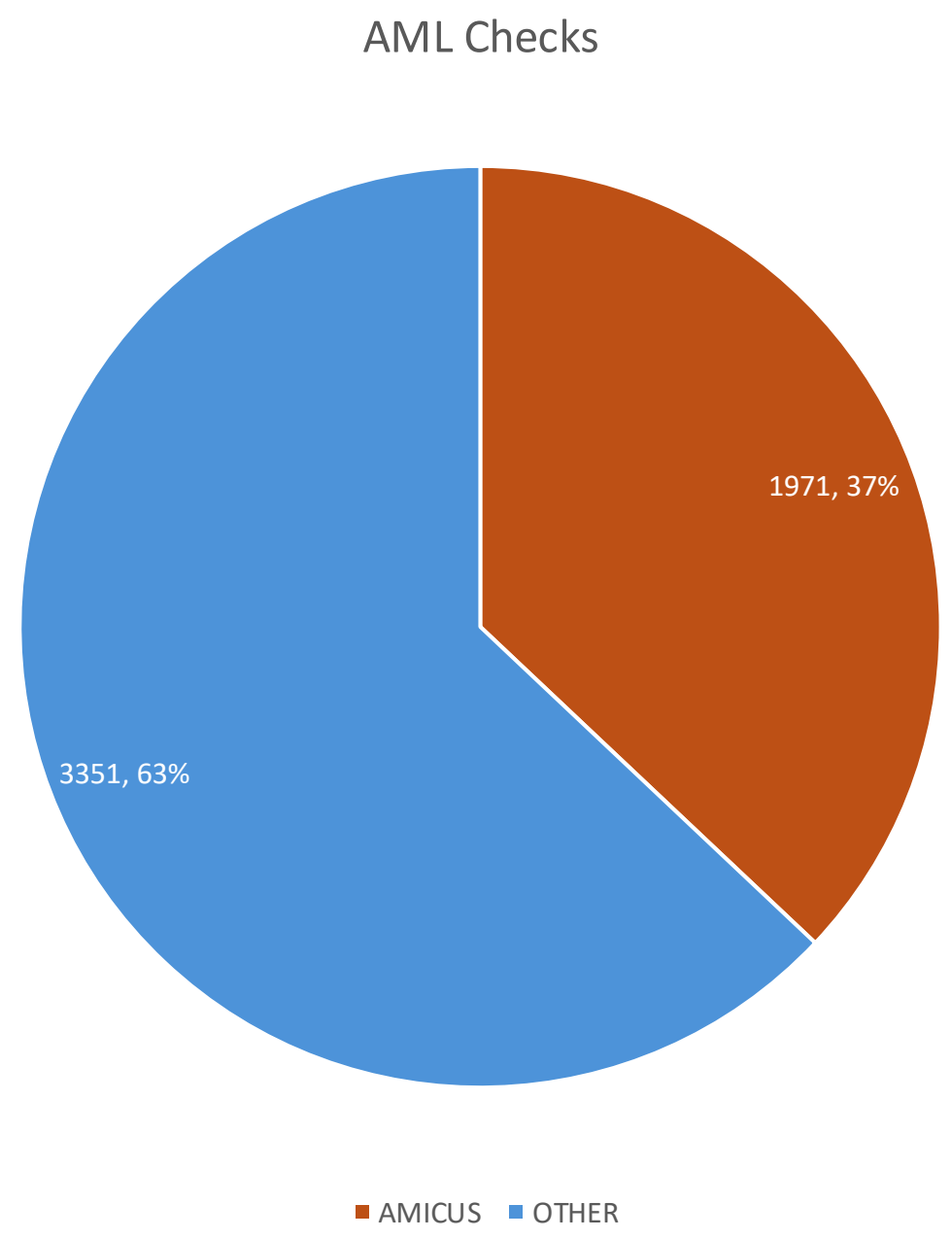
Government innovating Digital Conveyancing Portal (DCP). Amicus signed an MOU with CrimsonLogic to provide a platform for Lawyers on timely searches.

DNFBP Users We Proudly Serve



Real Estate AML Check by Developers (New Launches in 2025)

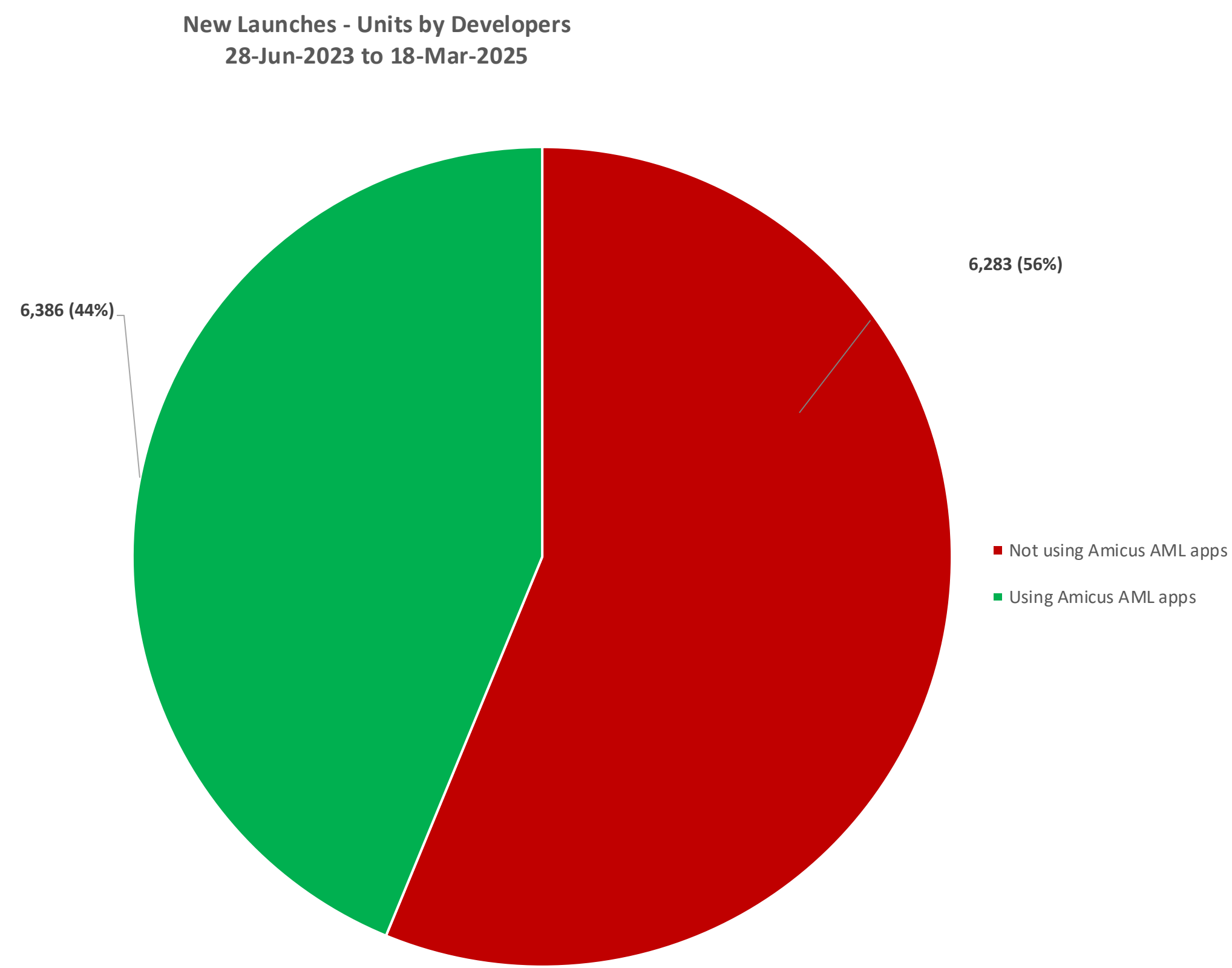
AML Check Spheres



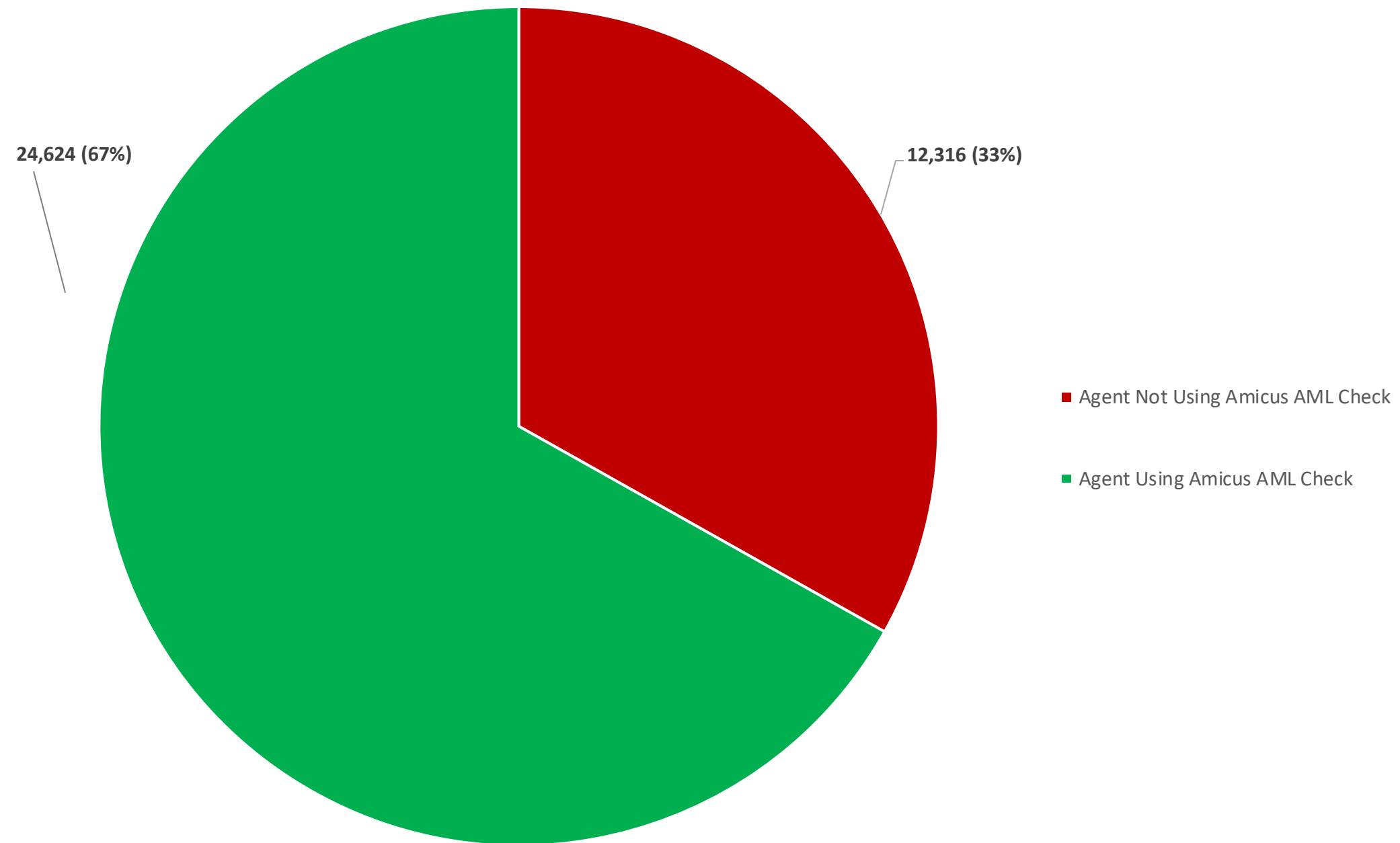
Project	Total Units	Launch Date	AML
BLOOMSBURY RESIDENCES	358	2025	OTHER
ONE MARINA GARDENS	937	2025	OTHER
21 ANDERSON	18	2025	AMICUS
AURELLE OF TAMPINES	760	2025	AMICUS
LENTOR CENTRAL RESIDENCES	477	2025	OTHER
AUREA	188	2025	OTHER
PARKTOWN RESIDENCE	1193	2025	AMICUS
ELTA	501	2025	OTHER
BAGNALL HAUS	113	2025	OTHER
ORIE, THE	777	2025	OTHER

Real Estate AML Check by Developers, Agencies, and Agents

AML Check Spheres

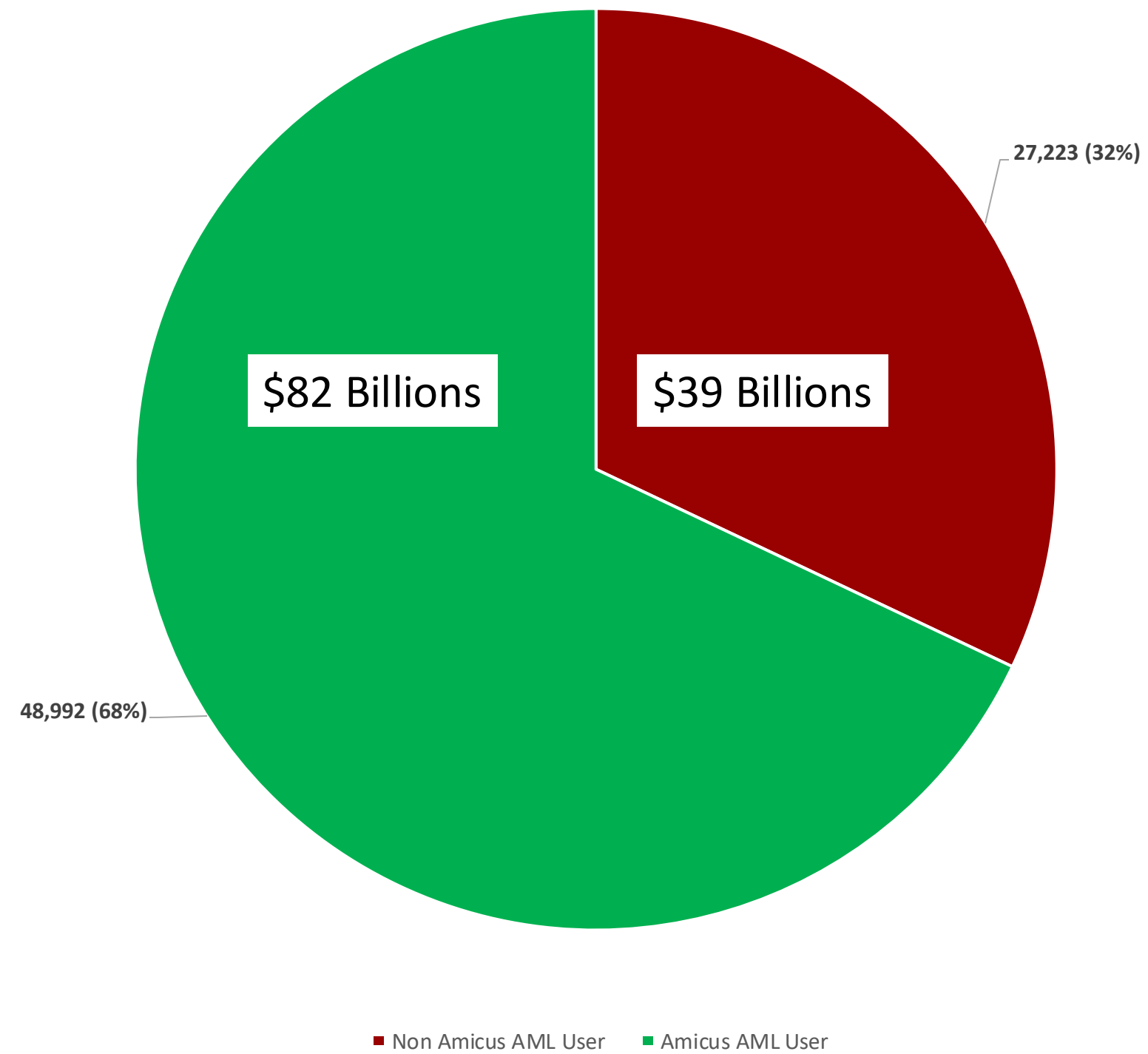


37K Real Estate Agents



* Source: Data from CEA

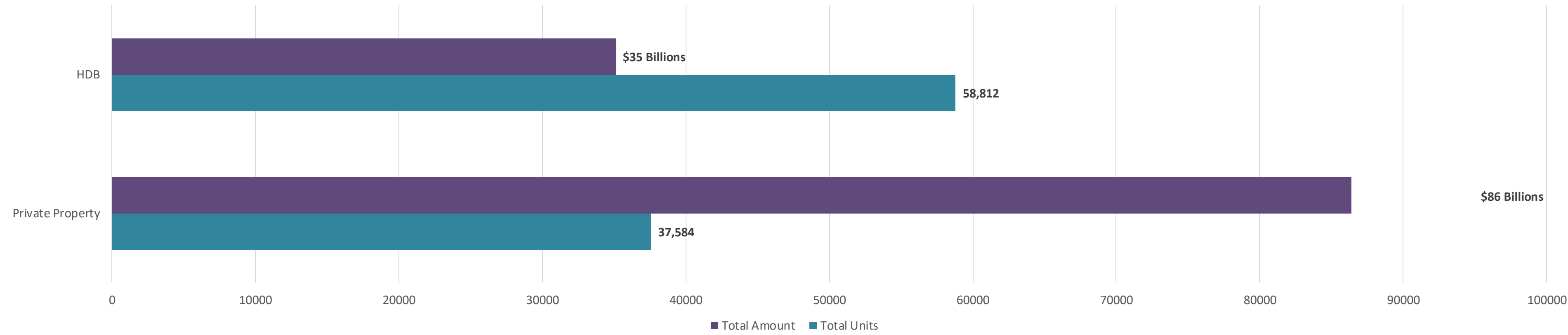
Resale Transacted Units by Agents/Agencies in Jan-2023 and Mar-2025



* Source: Data from CEA with Represented Seller

As of 18-Mar-2025

Total REALIS count / Transaction amount Jan-2023 To Mar-2025



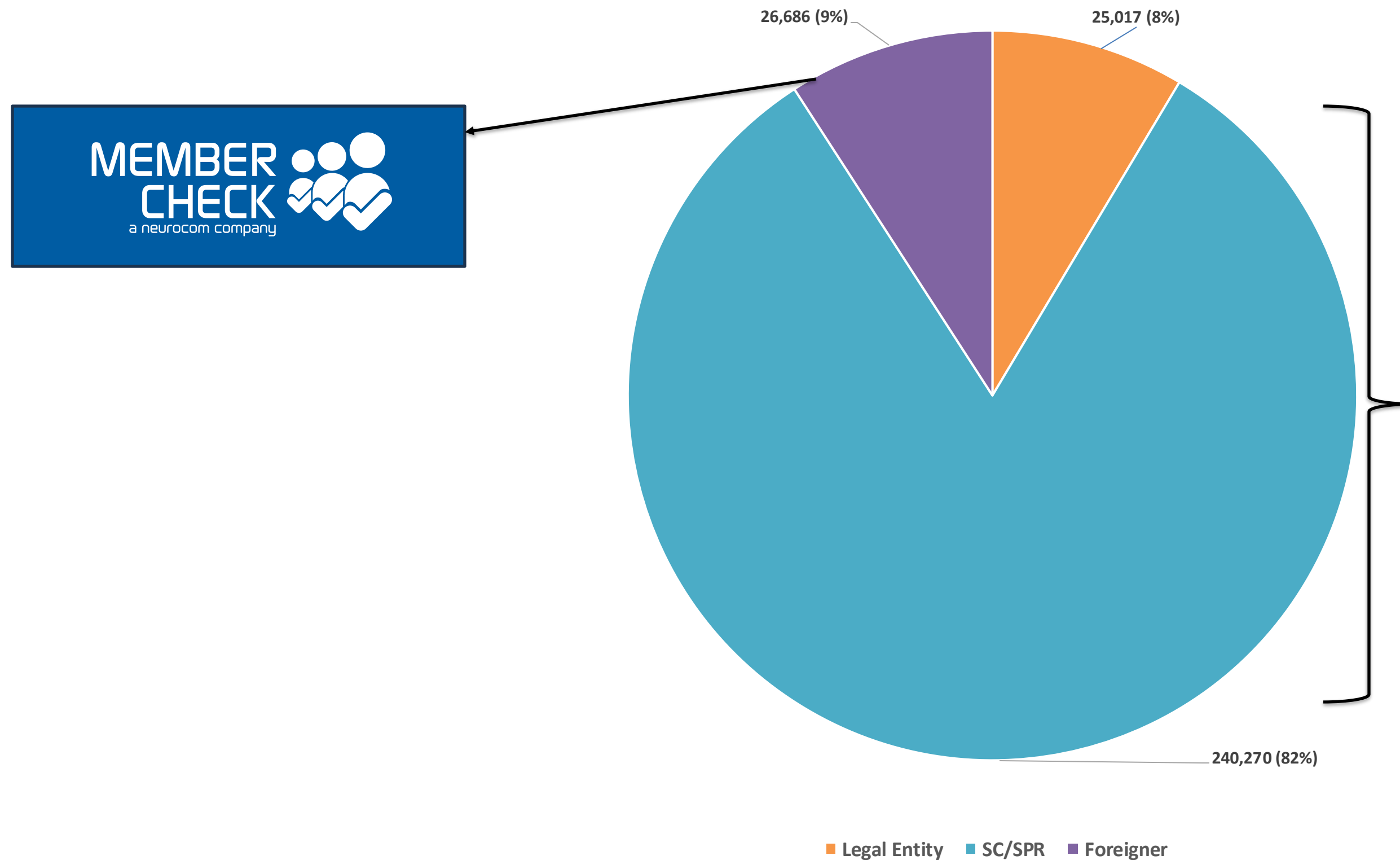
Total Transacted Amount \$121 Billions in 27 Months

68% of \$121 Billions = \$82 Billions

Amicus AML Check = \$3.04 Billions Monthly

\$101 Millions per day

Total SC/SPR, Foreigner and Legal Entity AML Check in 2023 to 2025

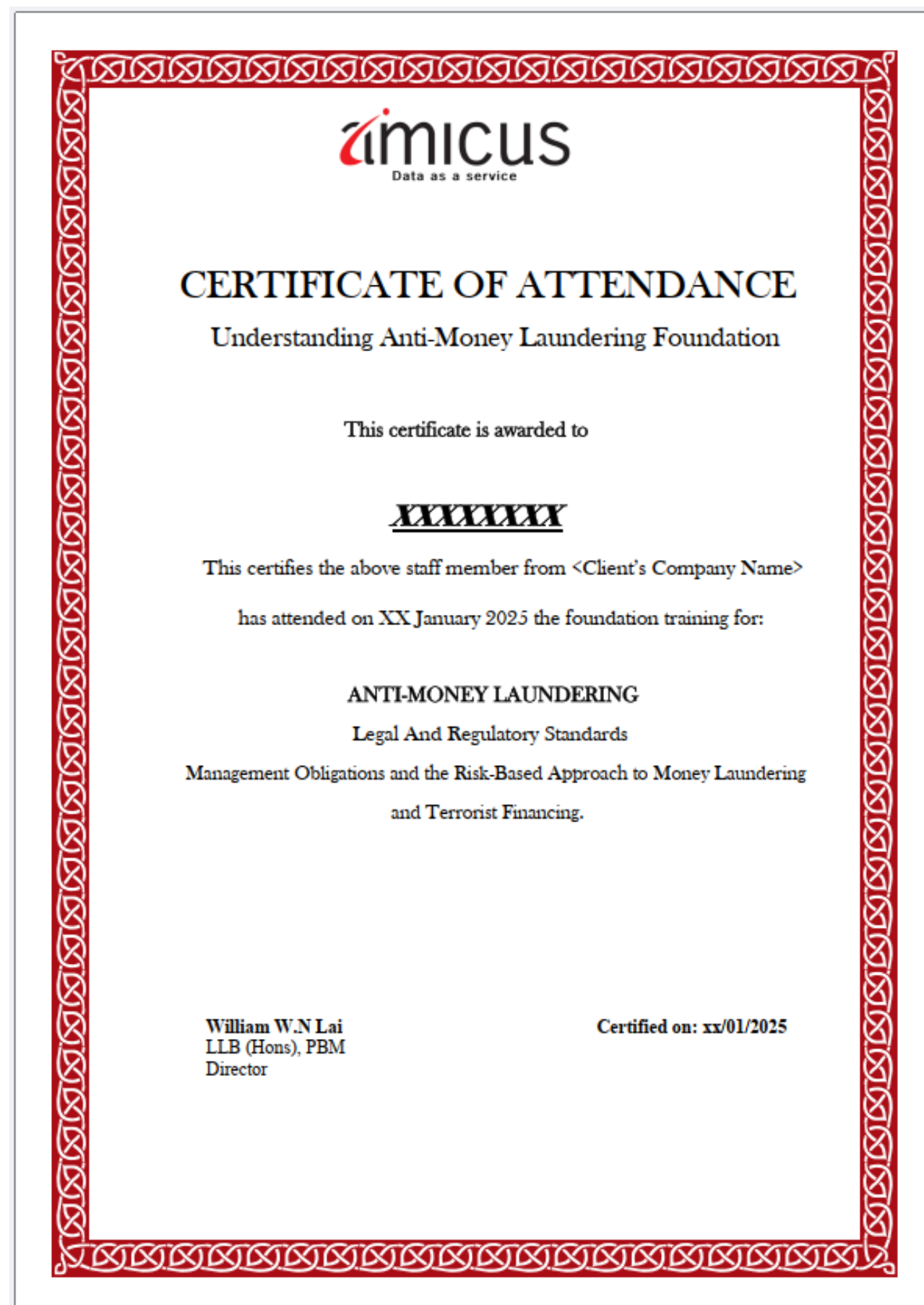


90%

Very Important In-Situ Data

- Singapore Civil Service
- Singapore Government Gazette
- Singapore Inter-Ministry Committee – Terrorist Designation
- Singapore Terrorism (Suppression of Financing) Act (TSOFA)
- Singapore MHA Suspicious Terrorist Alert Lists
- Singapore Investor Alert List
- Singapore Bankruptcy Database
- Singapore Corporate Database
- State Courts Criminal Trials

Since Inception of AML Regulations, We trained over 5,000
Agents/Developer Company staff/ other DNFBP staff



Our Team:

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THANK YOU

