

# **“Annex Suspected Money Laundering or Terrorism Financing Transaction Patterns”**

Financial Supervisory Commission on September 30, 2017  
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## I. Electronic payment operation

- (I) The cash deposit made in the same electronic payment account is accumulated to a certain amount over a certain period of time.
- (II) The cash deposit made by the same user is for an amount slightly below the threshold amount and it is accumulated to a certain amount over a certain period of time.
- (III) An unusually large sum of money is deposited in, transferred in and out, or withdrawn from the electronic payment account, and the electronic payment account does not have any physical transaction completed, or the actual transaction does not correspond to the amount deposited, or is not consistent with the historical transaction records.
- (IV) An inactive electronic payment account suddenly has a certain amount of money in and out of the account, and then rapidly transferred out of the account.
- (V) The users after opening the electronic payment accounts immediately have a certain amount of money deposited in the account and promptly transferred out.
- (VI) A certain amount of money or several deposit transactions are deposited in the electronic payment accounts intensively and then promptly transferred out of the accounts.
- (VII) The users often request to change the agreed deposit accounts when making withdraws or collecting the real transaction refunds.
- (VIII) The users often have funds transferred in the name of making a real

transaction, but the truth is having funds transferred from the electronic payment accounts.

(IX) The users make each deposit or withdrawal for a large sum in a relatively short period of time that is accumulated to a certain amount of money.

(X) The amount of transactions remitted in (or remitted to those countries or regions) from countries or regions with high risk of money laundering or terrorism financing is accumulated to a certain amount of money. The high-risk countries or regions described in this Template include but not limited to the countries or regions with serious nonconformities in anti-money laundering and countering terrorism financing committed that are announced by International Anti-Money Laundering Organizations and forwarded by the Financial Supervisory Commission, and other countries and regions that failed to comply or fully comply with the advice of the International Anti-Money Laundering Organizations.

## II. Abnormal transaction activity / behavior — transaction behavior category

(I) Electronic payment accounts are often found with frequent abnormal refund operations.

(II) Special severe cases reported on media, including television, newspapers, magazines, and the Internet. The offender has made deposits, transfers, or withdrawals with the electronic payment institutions, which are obviously abnormal transactions.

## III. Abnormal Trading Activity / Behavior — User Identity Information category

The electronic payment institutions found that the users are with the reportable matters as stated in the “Guidelines for Anti-Money Laundering and Countering Terrorism Financing for Electronic Payment Institutions (Template);” therefore, the identity confirmation procedures could not be completed.

#### IV. Terrorism financing category

- (I) A real beneficiary of a transaction is a terrorist or group on the list provided by a foreign government and forwarded by the Financial Supervisory Commission; or a terrorist organization identified or traced by an international organization; or the transaction fund is suspected of or reasonably suspected of relating to terrorist activities, terrorist organization, or terrorism financing.
- (II) Users have withdrawn or transferred funds exceeding a specified amount over a certain period of time to hot zones where military and terrorist activities are frequent, or to non-profit organizations accumulate more than a specified amount and has the business relationship ended immediately.
- (III) Frequently conduct transnational transactions amounting to more than a specified amount in the name of a not-profit group without a reasonable explanation.

#### V. Cross-border transactions

- (I) Users frequently withdraw or transfer funds to foreign countries for a certain amount of money.
- (II) Users frequently deposit large sums with foreign funds and immediately make withdrawals for a specified amount of money.
- (III) Users frequently receive funds from overseas for a specified amount and then have the funds withdrawn or transferred to another person in the same country or region, or transferred the funds to the payer's account in another country or region.
- (IV) Users frequently have large funds withdrawn or transferred from the country or region with high risk of tax avoidance or high financial

confidentiality.