

## STATEMENT OF DISCIPLINARY ACTION

## ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING ORDINANCE (Chapter 615)

Pursuant to section 53Z of the Anti-Money Laundering and Counter-Terrorist Financing Ordinance ("AMLO"), disciplinary action set out below has been taken by the Registrar of Companies ("the Registrar") against the following trust or company service provider licensee:

Licence No.	TC000026
Name of Licensee	進領顧問有限公司
	JINETIC CONSULTANTS LIMITED
Contravention	(1) Contravention of section 2(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to verify the customer's identity on the basis of documents, data or information as required under section 2(1)(a); and the Licensee has failed to verify the authority of the person purporting to act on behalf of a customer as required under section 2(1)(d).
	(2) Contravention of section 19(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to establish and maintain effective procedures for determining whether a customer or a beneficial owner of a customer is a politically exposed person.
	(3) Contravention of section 19(3) of Schedule 2 to the AMLO, namely, the Licensee has failed to establish and maintain effective procedures not inconsistent with the AMLO for the purpose of carrying out the duties under sections 3, 4, 5, 9, 10 and 15 of Schedule 2.
	(4) Contravention of section 23 of Schedule 2 to the AMLO, namely, the Licensee has failed to take all reasonable measures to ensure that proper safeguards exist to prevent a contravention of any requirement under Part 2 or 3 of Schedule 2; and to mitigate money laundering and terrorist financing risks.
Date of Decision	11 January 2024
Disciplinary Action Taken	Public reprimand and imposition of a pecuniary penalty of HK\$18,000