



公 司 註 冊 處
COMPANIES REGISTRY

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 against the following trust or company service provider licensee:

Licence No.	TC008593
Name of Licensee	加域會計事務有限公司 KEY WILL ACCOUNTANTS & ADVISORS LIMITED
Contravention	<p>(1) Contravention of section 2(1)(a), (b) and (d)(ii) of Schedule 2 to the AMLO, namely, the Licensee has failed to take measures to verify the identity of its customers and their beneficial owners and to verify the authority of the persons purported to act on behalf of its customers.</p> <p>(2) Contravention of section 5(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to continuously monitor the business relationships with its customers by reviewing from time to time documents, data and information relating to the customers that have been obtained by the Licensee for the purpose of conducting customer due diligence to ensure that they are up-to-date and relevant.</p> <p>(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.</p> <p>(4) Contravention of section 20(1)(b)(i) of Schedule 2 to the AMLO, namely, the Licensee has failed to keep the original or copies of the documents and records obtained in the course of identifying and verifying the identity of its customers or any beneficial owner of the customers in accordance with Part 2 of Schedule 2.</p> <p>(5) 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.</p>
Date of Decision	20 January 2026
Disciplinary Action Taken	Public reprimand, order for remedial action and imposition of a pecuniary penalty of HK\$25,000.