



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.	TC004799
Name of Licensee	聯盟顧問有限公司 UNION TOP CONSULTANTS LIMITED
Contravention	<ol style="list-style-type: none">(1) Contravention of Condition 2 of the licence imposed by the Registrar of Companies pursuant to section 53J of the AMLO, namely, the Licensee has failed to put in place adequate and proper anti-money laundering and counter-terrorist financing policies, procedures and controls, as evidenced by policy statement(s) or other written documents.(2) Contravention of section 2(1)(d) of Schedule 2 to the AMLO.(3) Contravention of section 9 of Schedule 2 to the AMLO.(4) 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.(5) 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.(6) 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	18 August 2023
Disciplinary Action Taken	Public reprimand, order for remedial action and imposition of a pecuniary penalty of HK\$30,000.