

FORM U5 – RISK DETERMINATION AND SCREENING CHECKLIST

Note: EAs and RESs are required to conduct screenings and risk assessments for all persons involved in rental and sale and purchase transactions using this form, as part of Unrepresented Counterparty Due Diligence. These include UCPs, BOs, and persons the UCPs is acting on behalf of. Separate forms should be used for each person.

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The screening is performed on the following person:

Name: _____ Identification Number: _____

Section 1: Check Against Lists on Terrorist Designation and Designated Individuals and Entities			
S/No	Description	Screening Results	Follow-Up
1	Is the UCP or BO a foreign PEP, a family member or close associate of a foreign PEP?	<input type="checkbox"/> No <input type="checkbox"/> Yes	Important Note: If the above screening result is positive, EAs and RESs must conduct Enhanced UCP Due Diligence (Form U6).
2	Is the transaction high risk? (Refer to red flag indicators in Annex A)	Any match? <input type="checkbox"/> No <input type="checkbox"/> Yes	
3	Is the UCP or BO from a High-Risk or Other Monitored Jurisdiction? (https://www.fatf-gafi.org/en/countries/black-and-grey-lists.htm https://www.fatf-gafi.org/en/topics/high-risk-and-other-monitored-jurisdictions.html)	Any match? <input type="checkbox"/> No <input type="checkbox"/> Yes	
4	Is the UCP or BO a designated individual or entity under the Terrorism (Suppression of Financing) Act 2002 (TSOFA)? (https://sso.agc.gov.sg/Act/TSFA2002)	Any match? <input type="checkbox"/> No <input type="checkbox"/> Yes	Important Note: If the above screening result is positive, EAs and RESs must not carry out any transaction with the UCP and terminate any transaction already entered into. They must consider submitting a Suspicious Transaction Report (STR) via SONAR (http://www.police.gov.sg/sonar).
5	Is the UCP or BO a designated individual or entity under United Nations sanctions lists or any regulations made under the United Nations Act 2001 (UN Act)? (https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list)	Any match? <input type="checkbox"/> No <input type="checkbox"/> Yes	
6	Has the UCP or BO obtained an exemption order under the TSOFA or UN Act?	Any match? <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> N/A	

Section 2: Red Flag Indicators Checklist			
S/No	Red Flag Indicators	Yes	No
1.	Is the UCP linked to negative news or crime (e.g. named in crime reports or UN Security Council Resolutions)?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Has the UCP provided multiple travel documents or documents from citizenship by investment (CBI) and residency by investment (RBI) programmes countries or FATF-flagged countries?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Does the UCP appear to be a shell company refusing to disclose the identity of its BO(s)?	<input type="checkbox"/>	<input type="checkbox"/>
4.	Is the UCP overly concerned about AML/CFT requirements and due diligence checks?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is the UCP resistant to providing additional information about BO or source of funds?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the UCP appear hesitant to put their name on property transaction documents?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Is the UCP using different names on Option to Purchase, closing documents and deposit receipts?	<input type="checkbox"/>	<input type="checkbox"/>
8.	Is the UCP purchasing property in the name of nominees (excluding spouse/child)?	<input type="checkbox"/>	<input type="checkbox"/>
9.	Is the UCP acting as a proxy and attempting to conceal the identity of a BO?	<input type="checkbox"/>	<input type="checkbox"/>
10.	Does the UCP appear to be structuring the transaction to hide the identity of a BO?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Has the UCP inadequately explained last-minute changes to a purchasing party?	<input type="checkbox"/>	<input type="checkbox"/>
12.	Has the UCP used different identification documents/passports for purchases?	<input type="checkbox"/>	<input type="checkbox"/>
13.	Has the UCP provided suspicious addresses (unknown/false/PO box)?	<input type="checkbox"/>	<input type="checkbox"/>
14.	Is the UCP taking on debt significantly higher than the property value?	<input type="checkbox"/>	<input type="checkbox"/>
15.	Is the UCP unconcerned about property value, location, or condition?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Is the UCP purchasing property without inspection or reviewing materials?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Is the UCP purchasing multiple properties quickly without due consideration?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Is the UCP a new legal entity with large transaction amounts?	<input type="checkbox"/>	<input type="checkbox"/>
19.	Does the UCP's business activity not match the transaction purpose?	<input type="checkbox"/>	<input type="checkbox"/>
20.	Is the UCP purchasing high-end property without professional assistance?	<input type="checkbox"/>	<input type="checkbox"/>
21.	Are there cash transactions exceeding S\$20,000?	<input type="checkbox"/>	<input type="checkbox"/>
22.	Is there a substantial cash down payment (>S\$20,000)?	<input type="checkbox"/>	<input type="checkbox"/>
23.	Is the rent paid far in advance (>3 months)?	<input type="checkbox"/>	<input type="checkbox"/>
24.	Are there unexplained third-party payments or unusual funding sources?	<input type="checkbox"/>	<input type="checkbox"/>
25.	Is the transaction value significantly different from market value?	<input type="checkbox"/>	<input type="checkbox"/>
26.	Are there successive transactions with unusual price differences?	<input type="checkbox"/>	<input type="checkbox"/>
27.	Does the transaction involve unnecessarily complex legal structures?	<input type="checkbox"/>	<input type="checkbox"/>
28.	Is the property purchased without a loan?	<input type="checkbox"/>	<input type="checkbox"/>
29.	Is there a transfer of property within an unusually short period?	<input type="checkbox"/>	<input type="checkbox"/>

Important Note: EA/RES must determine whether to file an STR if the answer to any of the above is a "yes".

Section 3: RES's Risk Determination and Conclusions

If the RES has determined the UCP or transaction to be presenting a higher risk of ML/PF/TF based on the information obtained during CDD and in this Risk Determination and Screening Checklist, the reasons for concluding that the UCP or transaction is of a higher risk are to be recorded below. The RES should proceed to conduct enhanced UCPDD (using Form U6) and determine whether to file an STR.

Reasons for Conclusion of Risk Level:

I, _____(RES Name), _____(Registration No.), declare that the above information provided are true, accurate and complete to the best of my knowledge and understanding.

Estate Agent Name:

Date of Completion:

Date of Submitting to EA:

Signature of RES: