

FORM B – 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 Customer Due Diligence. These include clients, BOs, and persons the client is acting on behalf of. Separate forms should be used for each person.

The screening is performed on the following person:

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Name: _____ Identification Number: _____

Section 1: Check for PEPs and Lists on Terrorist Designation and Designated Individuals and Entities			
S/No	Description	Screening Results	Follow-Up
1	Is the client or BO a foreign PEP, a family member or close associate of a foreign PEP?	☐ No ☐ Yes	Important Note: If the screening result is positive, EAs and RESs must conduct Enhanced Customer Due Diligence (Form C).
2	Is the transaction high risk? (Refer to red flag indicators in Annex A)	☐ No ☐ Yes	
3	Is the client or BO from a High-Risk or Other Monitored Jurisdiction? (https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html) (https://www.fatf-gafi.org/en/topics/high-risk-and-other-monitored-jurisdictions.html)	☐ No ☐ Yes	
4	Is the client 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? ☐ No ☐ Yes	Important Note: If the screening result is positive, proceed to Q6 below.
5	Is the client 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? ☐ No ☐ Yes	
6	Has the client or BO obtained an exemption order under the TSOFA or UN Act?	☐ No ☐ Yes ☐ N/A	Important Note: If screening result for either Q4 or Q5 above is positive and no exemption order has been obtained under TSOFA or UN Act, EAs and RESs must not carry out any transaction with the client and must terminate any transaction already entered into. They must submit a Suspicious Transaction Report (STR) via SONAR (https://www.police.gov.sg/sonar).

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

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 client 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 client or transaction is of a higher risk are to be recorded below. The RES should proceed to conduct ECDD (using Form C) 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: