

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.

Page 1 of 3

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?	☐ No ☐ 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? ☐ No ☐ 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.html) (https://www.fatf-gafi.org/en/topics/high-risk-and-other-monitored-jurisdictions.html)	Any match? ☐ No ☐ 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? ☐ No ☐ 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? ☐ No ☐ Yes	
6	Has the UCP or BO obtained an exemption order under the TSOFA or UN Act?	Any match? ☐ 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 UCP linked to negative news or crime (e.g. named in crime reports or UN Security Council Resolutions)?	☐	☐
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?	☐	☐
3.	Does the UCP appear to be a shell company refusing to disclose the identity of its BO(s)?	☐	☐
4.	Is the UCP overly concerned about AML/CFT requirements and due diligence checks?	☐	☐
5.	Is the UCP resistant to providing additional information about BO or source of funds?	☐	☐
6.	Does the UCP appear hesitant to put their name on property transaction documents?	☐	☐
7.	Is the UCP using different names on Option to Purchase, closing documents and deposit receipts?	☐	☐
8.	Is the UCP purchasing property in the name of nominees (excluding spouse/child)?	☐	☐
9.	Is the UCP acting as a proxy and attempting to conceal the identity of a BO?	☐	☐
10.	Does the UCP appear to be structuring the transaction to hide the identity of a BO?	☐	☐
11.	Has the UCP inadequately explained last-minute changes to a purchasing party?	☐	☐
12.	Has the UCP used different identification documents/passports for purchases?	☐	☐
13.	Has the UCP provided suspicious addresses (unknown/false/PO box)?	☐	☐
14.	Is the UCP taking on debt significantly higher than the property value?	☐	☐
15.	Is the UCP unconcerned about property value, location, or condition?	☐	☐
16.	Is the UCP purchasing property without inspection or reviewing materials?	☐	☐
17.	Is the UCP purchasing multiple properties quickly without due consideration?	☐	☐
18.	Is the UCP a new legal entity with large transaction amounts?	☐	☐
19.	Does the UCP's business activity not match the transaction purpose?	☐	☐
20.	Is the UCP 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 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 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: