

INTERNAL GUIDELINES FOR ONGOING AML/CFT MONITORING OF EXISTING/RENEWAL CLIENTS

This is the guidelines for Healy Consultants' Compliance department to **i)** obtain relevant due diligence documents from clients as part of the ongoing monitoring process of existing/renewal clients and **ii)** comply with the AML/CFT requirements as required by ACRA from Registered Filing Agents.

1. Six months before annual return date, Compliance department must complete below tasks for each client:

- Liaise with CRO or directly (where CROs in charge have left) complete Renewal Client Risk Assessment, conduct DJ and Google searches on client and save findings in client folder;
- Review the client file and due diligence documents in our possession, prepare renewal due diligence checklist for expired or missing documents;
- Prepare **i)** relevant agreements if new services have been added since the last renewal and **ii)** request for declaration of UBO;
- Email our client with above requests and give clients a 2-week timeline to respond;
- Follow up with our client for due diligence documents by sending weekly reminder.

2. Other consideration

According to the risk profile of the Client and the nature of services we are providing, for purposes of ongoing monitoring, Compliance will use the table below to determine documents to be requested from existing/renewal clients:

Client	Re-engagement letter	Business proof	Updated DD
Low risk	Yes, every two years	Yes, every year	Yes, every three years
Medium risk	Yes, every two years	Yes, every year	Yes, every two years
High risk	Yes, every two years	Yes, every year	Yes, every year

3. Non-payment of Renewal Fees

For those clients who have renewal payments pending for years, Legal department to **i)** email our client closure letter, tax letter and bank letter after Aidan's approval; **ii)** assist Healy Consultants to legally resign as company director and/or secretary **iii)** remove our registered office address **iv)** close the company (if needed).