

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 ("the Registrar") against the following trust or company service provider licensee:

| Licence No. | TC005121 |
|---------------------------|---|
| Name of Licensee | ZENITH CONSULTING SERVICES LIMITED |
| Contravention | (1) Contravention of sections 2(1)(a) and 3(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to take measures to identify and verify the identity of customers before establishing business relationship with customers. |
| | (2) Contravention of section 5(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to continuously monitor the business relationship with a customer by reviewing from time to time documents, data and information relating to that customer that have been obtained by the Licensee for the purpose of conducting customer due diligence to ensure that they are up-to-date and relevant. |
| | (3) Contravention of section 20(1) of Schedule 2 to the AMLO, namely, the Licensee has failed to keep the original or copies of the documents and records obtained in the course of identifying and verifying the identity of customers in accordance with Part 2 of Schedule 2 to the AMLO. |
| | (4) Contravention of section 23 of Schedule 2 to the AMLO, namely, the Licensee has failed to take all reasonable measures to mitigate money laundering and terrorist financing risks. |
| Date of Decision | 19 July 2022 |
| Disciplinary Action Taken | Public reprimand and imposition of a pecuniary penalty of HK\$10,000 |