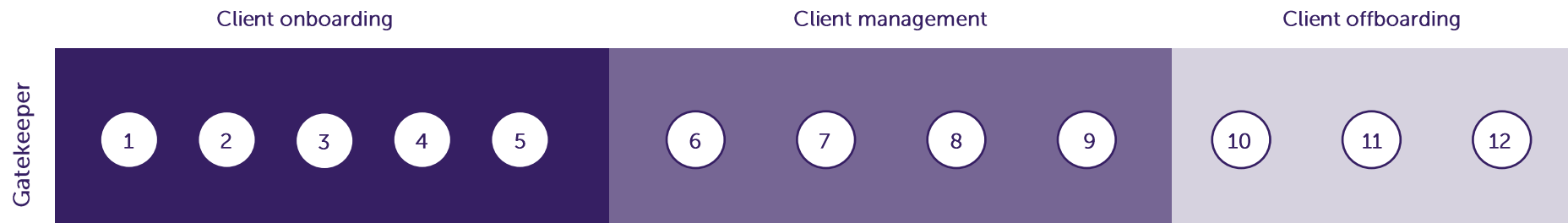


# Reporting unusual transactions: when do I need to be alert?

*What is considered to be an unusual transaction? What can you report to prevent money laundering and terrorist financing?*

An unusual transaction includes more than just a deviating transaction pattern. A report can be filed when something unusual is suspected. This does not implicate that a client is also a suspect. This overview provides an example of moments when you need to be alert to unusual transactions. If you have any doubt whether a situation concerns an unusual transaction, always contact your compliance officer.



1. The client does not give full disclosure
2. The client is situated in a high risk country
3. The origin of assets and/or UBO is untraceable
4. There is reason to believe an unusual transaction took place in the past
5. Due to integrity risks the client is not accepted

6. There are deviating deposits and withdrawals (in size and nature)
7. The origin of assets remains unclear and the client will not give full disclosure
8. Withdrawals do not fit the investment goal or regular transaction pattern
9. Information is changed during services (address, contra account, authorizations)

10. It is unclear why a client wants to discontinue services (prematurely)
11. The reason to discontinue services does not match the client profile (investment goal, risk appetite)
12. The client moves to an investment firm situated in a high risk country

*By reporting unusual transactions you contribute to a fair financial sector*