

為加深持牌人對反洗錢及反恐怖分子資金籌集（「反洗錢」）議題的認知，我們會在《專業天地》這個「反洗錢專區」為大家提供有關反洗錢的有用資訊及最新消息。

To enhance licensees' knowledge on the subject of anti-money laundering ("AML") and counter-terrorist financing, we will provide useful information and updates about AML in the "AML Corner".



鑑於監管局近期發現一些有關反洗錢指引的違規行為，我們在此提醒持牌人注意以下事項。

在處理涉及非個人（例如有限公司）的物業交易時，當持牌人進行客戶盡職審查，以識別及核實聲稱代表客戶行事的人士時，持牌人須取得授權文件（例如公司董事會決議或公司發出的書面授權），以核實該代表已獲正式授權簽署臨時買賣協議。即使該代表為公司唯一董事，此要求依然適用。

此外，監管局已於2025年10月3日就有關遵守反洗錢及反恐怖分子資金籌集規定的執業通告，更新了一套詳細的問與答，持牌人可以到監管局網站閱讀更新的問與答：
https://www.eaa.org.hk/Portals/0/Sections/LGA/Circular/23-01_CRC_QAs_20251003.pdf

In view of some recent malpractice discovered by the EAA, we would like to remind licensees on the below.

When handling a property transaction involving an entity (such as a limited company) and the licensee is performing customer due diligence to identify and verify a person purporting to act on behalf of a customer, the licensee has to obtain an authorisation document (such as a board resolution or similar written authorisation issued by the said company) to verify that the representative is duly authorised to sign the provisional agreement for sale and purchase. This requirement applies even if the representative is the sole director of the company.

In addition, the EAA has updated a set of detailed Questions and Answers related to the Practice Circular on Guidelines on Compliance of Anti-Money Laundering and Counter-Terrorist Financing Requirements for the Estate Agency Sector on 3 October 2025. Licensees are advised to read the abovementioned updated Q&As on the EAA's website: https://www.eaa.org.hk/Portals/0/Sections/LGA/Circular/23-01_CRE_QAs_20251003.pdf

