For the internal purpose

**To the attention of subjects of financial monitoring on current**

**indicators of risky financial transactions!**

For more than a month, Ukraine has been resolutely fighting back against the aggressor country and fighting for freedom and democracy around the world. The criminal actions of the russian federation and its henchman, the Republic of Belarus, are aimed at destroying the Ukrainian government and the Ukrainian people by carrying out/encouraging terrorist acts and violence that contain all signs of international terrorism, including bomb terrorism. The great people of Ukraine have united, the countries have united to fight for common values of lLaw Enforcement.

In peacetime, the financial monitoring system was effective and efficient. At present, all participants in the financial monitoring system must focus their efforts on not giving any chance to any attempts to finance terrorism or the use of the financial system by terrorists.

To this end, we must take systematic measures to prevent or stop supporting terrorists, their financing, whether directly or indirectly, and to counter the movement of funds that can be used to commit terrorist offenses and/or terrorist financing, as well as to resist the movement of funds received as a result of such crimes, and to intensify the exchange of such information with other participants in the financial monitoring system (subjects of primary and state monitoring, State Financial Monitoring Agency, law enforcement agencies), foreign colleagues. It should be borne in mind that terrorists can use channels of international cooperation to cover their activities, including those that pursue charitable, social and cultural goals.

The risk-oriented approach of the subjects of primary financial monitoring (SPFM) should be aimed as much as possible at preventing the implementation of financial transactions that have signs of terrorism or its financing in Ukraine. At the same time, it should be noted that the following risk indicators are intended to increase the SPFM's attention in research and analysis to confirm suspicions of terrorist financing. It should be noted that the presence of only one indicator can not serve to confirm the financing of terrorism and the analysis should use information from different sources.

The following list contains indicators inherent in clients or counterparties, including residents of the russian federation and the republic of belarus, as well as persons registered in the uncontrolled or temporarily occupied territories of Ukraine, in particular:

-residents of Ukraine who have shares in the authorized capital, formed by individuals and legal entities registered on the territory of the russian federation and the republic of belarus and on the non-controlled territories;

-legal entities - residents of Ukraine, which are official representations of russian and belarusian companies;

-residents of Ukraine who have a stable business relationship with russian / Belarusian individuals or legal entities;

- non-resident clients with hidden ultimate beneficial owners (controllers) who have open accounts in Ukrainian banks;

- non-resident clients registered in offshore jurisdictions and jurisdictions with weakened tax/currency controls that have open accounts in Ukrainian banks;

-citizens of the russian federation and the republic of belarus, as well as citizens of Ukraine registered in the temporarily occupied territories of Ukraine, who opened accounts in Ukrainian banking institutions/received transfers during the year before the war;

-non-residents individuals - employees of law enforcement agencies of russia and belarus, who took/are participating in the criminal activities of the aggressor country on the territory Ukraine and Europe.

Please, pay attention to the implementation of enhanced measures of proper inspection of clients (nominal, real) and persons acting in their interests or on their behalf, or control them, in particular:

- persons who have previously been or are currently accused of terrorism or its financing and/or crimes related to terrorism/separatism;

-persons who support or promote the ideas of separatism, radicalism, extremism, racism;

- clients who avoid personal contact with employees of financial monitoring entities;

- clients who provide documents with signs of forgery to the subjects of primary financial monitoring, as well as provide newly issued identification documents;

- customers who refuse to provide additional information or update it;

-individuals who constantly change their place of residence;

-individuals who submit different documents to different subjects of primary financial monitoring;

- clients who provide false contact information;

- clients who use shared IP addresses;

- clients whose accounts are used as transit accounts to receive and further transfer funds;

- client-recipient of funds, who indicates the address of the hotel as a personal registration address;

- the purchaser of goods is not the final recipient of these goods.

The subjects of primary financial monitoring should pay particular attention to the financial transactions of clients who try to hide the sources of funds and/or real beneficiaries, which, in turn, may have the effect of concealing assets used by terrorists or persons associated with them.

Unacceptably high risks may be borne by foreign economic financial transactions carried out for the benefit of beneficiaries from russia and belarus or persons controlled by them, in particular:

- transfer of funds outside Ukraine on the basis of sham additional debt assignment on assignment of debt, offsetting of claims under import contracts concluded with residents of the russian federation and the republic of belarus, in order to withdraw funds to other enterprises, including other jurisdictions;

- transfer of funds outside Ukraine on the basis of sham additional debt assignment on assignment of debt, offsetting claims under loan agreements (loans, credits, financial assistance) concluded with residents of the russian federation and the republic of belarus, in order to return borrowed funds to other enterprises, including others jurisdiction (lack of full information on the total loan amount, established/paid interest, which allows repayment of loans, interest payments after many years);

-carrying out any transactions with securities issued by residents of the russian federation and the republic of belarus or persons affiliated with such residents.

In addition, the following financial transactions may involve unacceptably high risk:

- the amount of funds and location of the financial transaction is not compatible with the location, income and age of the client;

- multiple payment of prepaid zit cards and/or expensive smartphones;

- repeated receipt of financial assistance from the same sources;

- financial transactions, which are repeatedly carried out in different places

short period of time;

- withdrawal of cash from the account in a short period of time after crediting funds;

- withdrawal of cash from the card account in various places (regions) near or in combat zones;

-receipt of financial assistance from third parties, accompanied by cash withdrawals in various places (regions) near or in combat zones;

- obtaining loans to purchase goods for third parties;

- financial transactions on currency exchange in significant volumes;

- repeated receipt of funds by individuals for use

various payment systems;

- payments to personal accounts of individuals made via the Internet as charitable contributions;

- repeated deposit of cash on card accounts with subsequent transfer of funds as payment for hotel rooms, air/train tickets, car rental, gasoline/diesel, mobile phones, zit cards;

- calculations related to the purchase of military and dual-use goods, as well as materials, technologies and industrial equipment for the needs of commercial entities subject to international and national sanctions restrictions;

- financial operations of persons who promote and support separatism on the territory of Ukraine and activities to discredit the constitutional order of Ukraine, encouragement of military action of the russian federation on the territory of Ukraine, and persons who promote such actions;

- transfer of funds by non-profit organizations (hereinafter - NPOs) in favor of citizens (organizations) of Russia and Belarus, citizens who are included in the sanctions lists, including foreign countries;

- large donations from abroad for unspecified purposes;

-the amount of donations to the NPO does not correspond to the financial condition of the person providing it;

- charitable contributions are transferred to a limited number of people;

- incomprehensible use of charitable contributions for purposes incompatible with the activities of NPOs;

- use of NPOs to sell goods.

UN Security Council Resolution #1373, adopted on September 28, 2001 under the Convention on the Suppression of the Financing of Terrorism provides:

- prevent and stop the financing of terrorist acts;

- immediately block the funds and other financial assets or economic resources of persons who commit or attempt to commit terrorist acts, or participate in the commission of terrorist acts, or contribute to their commission; organizations directly or indirectly owned or controlled by such persons, as well as persons and organizations acting on behalf or at the direction of such persons and organizations, including funds received or acquired through property directly or indirectly owned by owned or controlled by such persons, as well as related persons and organizations, acting on behalf of or by order of such persons.

Therefore, we strongly recommend that in case of detection of financial transactions aimed at committing terrorist offenses and/or its financing, take restrictive measures provided by the Law of Ukraine "On Prevention and Counteraction to Legalization (Laundering) of Proceeds from Crime, Terrorist Financing and Financing Weapons Proliferation Destruction”, in particular to apply the procedure of suspension of financial transactions in accordance with Part 1 of Article 23 of the Law.

Our country is in danger, we continue to work.

Thank you for your cooperation, together we are a force!