

INDICATORS OF SUSPICIOUS TRANSACTIONS FOR BANKS

1. Several linked cash transactions in amounts less than EUR 15,000 which all together exceed this amount, if such transactions are not consistent with the client's usual business transactions (an example of a usual transaction conducted in several operations is the depositing of the daily receipts more than once a day).
2. Deposits or withdrawals of large amounts of money (in local or foreign currency) which significantly differ from the client's usual transactions, being inconsistent with the client's income or status, especially if they are not typical for the client's business activity.
3. Purchase or exchange of a large number of traveler's cheques or securities for cash, especially if they are not typical for the client.
4. Depositing a large amount of cash as collateral. Subsequently, a sudden request by the client to repay the loan before the maturity date.
5. Deposits or withdrawals of cash in amounts just below the threshold prescribed by the Law on the Prevention of Money Laundering.
6. Transactions in large amounts through an account that has been dormant for a long period of time, possibly followed by an order for the account to be terminated.
7. Large amounts deposited into an account, then an order to the bank to transfer the funds in favor of several persons' accounts, especially when it is noticed there is no rational explanation or economic justification to such transactions
8. Several seemingly unrelated persons deposit funds into the account of a client, who instantly withdraws them or instructs the bank to transfer them into another account, or credit them to the accounts of other persons, especially when it is noticed there is no rational explanation or economic justification to such transactions.
9. Frequent transactions based on advance payments or advance repayments justified by the client as non-performance of commercial contracts.
10. Transactions requiring several intermediaries or several accounts, especially if the parties to the complex transactions come from the non-cooperating countries and territories, or countries with strong bank secrecy. The list of such countries, developed on the basis of the information provided by relevant international organizations and the Administration, are placed on the website of the Administration for the Prevention of Money Laundering.
11. Client submits a loan application, or the one for opening a letter of credit or executing another bank instrument based on a guarantee issued or covered by an off-shore bank, or a bank of dubious credit-worthiness; also a bank from a non-cooperating country and territory. The list of such countries is placed on the website of the Administration for the Prevention of Money Laundering.
12. Transfers of large amounts to foreign countries from a client's account when the account balance stems from many cash deposits into accounts of the client in one or several banks.

13. Transactions marked as “unusual” by bank employees based on their knowledge and experience.
14. Client has never been employed but nonetheless holds significant funds in accounts.
15. Client holds accounts in several branch offices of the same bank, deposits cash into each of them, with the sum being a significant amount.
16. Frequent deposits of funds claimed by the client to originate from the sale of property, even though the existence of the property is questionable.
17. Persons authorized to conduct transactions on a company’s account refuse to provide complete information on the company’s business activities.
18. Client makes cash deposits into the account of his/her own company, marking the purpose of payment “founder’s loan” or “increase in equity”.
19. A large number of transactions to deposit cash into the account held by a company which by the nature of its business does not financially operate in cash.
20. Withdrawals of large amounts of money in cash from an account to which significant funds were transferred on the basis of a loan granted abroad.
21. A small enterprise operating in one location only deposits or withdraws funds on the same day in several branch offices of the same bank, which could be regarded as impractical for the enterprise.
22. A significant increase in number and/or frequency of cash deposits or withdrawals for a company that provides professional and consultant services, especially if the deposits are immediately transferred to other accounts.
23. Transactions between a personal and company account which do not indicate a clear economic purpose.
24. A client transfers funds into an account in a foreign country with which the client’s company has no business relations, or receives remittances from business entities with which there are no business relations.
25. Ordering customer or beneficiary of a payment order is a national of a non-cooperating country or territory or is included on the consolidated list of the United Nations Security Council Resolution 1267 Sanctions Committee. The list of countries is placed on the website of the Administration for the Prevention of Money Laundering. The United Nations list is available at <http://www.un.org/Docs/sc/committees/1267/1267ListEng.htm>
26. Transactions with persons or entities registered in countries which have a reputation for drug trafficking, or for being a transit territory for drugs, or have strict bank secrecy laws in place. The list of such countries, developed on the basis of the information provided by relevant international organizations and data available to the Administration, is placed on the website of the Administration for the Prevention of Money Laundering.

27. Frequent transfers in large and round sums.
28. Evading of questions related to the transaction, given power of attorney, identification, etc, or presentation of false documents or incorrect data.
29. Attempt by the client to prove his/her identity in another manner, rather than presenting a personal identification document as prescribed.
30. A client is rather talkative about the topics related to money laundering or terrorism financing.
31. Unusually thorough knowledge of regulations related to suspicious transactions reporting demonstrated by a client, who is then quick to confirm that the money involved is “clean” and not laundered.
32. Transaction is effected by a client accompanied by a person obviously watching the client’s behavior, or insisting that the transaction be effected quickly.
33. A loan application submitted by a client -legal entity, despite the fact that economic and financial indicators of the client’s standing do not identify a need for a loan. Subsequently, the funds granted by the loan are transferred into accounts kept with an off-shore bank, or in favor of a third party, or are used beyond specified purpose.
34. A safe–deposit box is used only by a person identified in the contract as a proxy that requests a cancellation of the contract for using the safe.
35. A company that is exempt from routine reporting requirements begins to have many transactions outside the pattern of its usual activity.
36. Large and/or frequent cash deposits by a politician or his family members or associates with no known or recognized source of funds.