

LIST OF INDICATORS FOR RECOGNIZING SUSPICIOUS TRANSACTIONS FOR PROVIDERS OF FINANCIAL LEASING

1. The client – lessee applies for the financing of the leasing object; the application contains incomplete or inaccurate data with an obvious intention to conceal basic information on the client's identity or business activity.
2. The client – lessee applies for the financing of the leasing object; the application does not seem justified in terms of the intended use of the leasing object or in terms of the client's business activity (obvious disproportion between the size of the investment and the type of the lessee's business, or a case when the leasing agreement is not appropriate in type to the client's business activity or intended business activity).
3. The client – lessee provides in the financial leasing agreement an offer for the leasing object at a price which is significantly different from the reasonable market price.
4. The client – lessee has selected a provider of the leasing object which is not known to be either a manufacturer or an authorized seller of the product which is the leasing object, especially if the provider comes from an offshore destination or from a country in which anti-money laundering and terrorism financing standards do not apply, or from a country with strict regulations in place on confidentiality and secrecy for banking and business data. The lists of such countries are posted at the Administration's website.
5. The client – lessee makes frequent payments according to the financial leasing agreement but from different branches of the same banks or from different banks, that is, from an account other than the one stated in the original version of the agreement.
6. The client – lessee cannot comply with contractual terms for payment, which results in another natural or legal person making payments on the lessee's behalf.
7. Leasing operations when a third party provides a guarantee to the lessee because of poor creditworthiness rate and when the connection between the lessee and the provider of guarantee, as well as the reasons for providing the guarantee are not clear enough. This is especially true in the cases when the guarantee is provided by a natural or legal person transferring funds from an offshore destination or from the countries which do not apply anti-money laundering and terrorism financing regulations. The list of such countries are posted on the Administration's website.
8. Leasing operations in which there is a provision on buy-back of the leasing object by the provider, which is offered at non-market prices (above or below the reasonable market price), especially when the leasing company does not know of the provider of the leasing object from before.
9. The client – lessee applies for the financing of the leasing object and submits documents to prove one's creditworthiness which show other income or guarantees covered by a bank or a third party with dubious creditworthiness or which are located in a country that does not apply anti-money laundering and terrorism financing standards. The lists of those countries are posted on the Administration's website.
10. The client – lessee offers down payment in a larger amount for the leasing object with no proper reason although the lessor does not explicitly requires it.
11. The client – lessee is a newly established, fast growing business company with small nominal capital which operates using a suspicious capital.
12. The client – lessee signs a financial leasing agreement accompanied by another person who is obviously watching the client's behaviour, which raises suspicion that the client is a “front” person for somebody else.