

## **LIST OF INDICATORS FOR IDENTIFYING SUSPICIOUS TRANSACTIONS IN MONEY EXCHANGE OPERATIONS**

1. Client exchanges large-denomination bank notes in significant amounts for small-denomination bank notes of the same currency, or vice versa, especially if such transactions are not consistent with the client.
2. Client exchanges battered and mutilated bank notes.
3. Client exchanges bank notes which are wrapped up and packed, which is not consistent with the client.
4. Client surrenders uncounted banknotes to the money changer. After the money is counted, the client requires a transaction just below the reporting threshold.
5. Client exchanges a larger amount of money from one foreign currency to another (conversion of large amounts).
6. Client or client's family frequently exchanges money for the identical and rounded amounts, or for the amounts which are just below the responding threshold, according to the Law on the Prevention of Money Laundering.
7. Client exchanging a large amount of money requests of the money changer to structure the transaction into the amounts below the reporting threshold.
8. Client exchanges a large amount of money without showing any interest in the exchange rate or commission charged by the bureau de change.
9. Client or client's family exchange large amounts of money frequently or in cycles, ie in the same intervals (always on the same days in a week, in a month, or similar).
10. Client insists, when buying large amounts of USD, to be given the denominations which are not subject to client identification requirements, according to the regulations relevant for exchange operations (denominations of 50 and 100 USD).
11. Money changer learns of the fact that during the same day client has exchanged money in large amounts at other exchange offices.
12. Client offers money, a gift or a favour to the money changer in exchange of his/her services.
13. Client is unusually familiar with regulations related to suspicious transaction reporting, and is quick to confirm that the money is „clean” and not laundered.
14. Client is very „talkative” about money laundering or terrorism financing matters.
15. Client conducts a transaction accompanied by a person who obviously keeps an eye on the way he is behaving or insists that the transaction be conducted quickly.
16. Client is reluctant to disclose on whose behalf or for whose account the transaction is being conducted.
17. Client presents identification documents which look forged, altered or incorrect.
18. Client protests when asked by the money changer to present a personal identification document.
19. Client is eager to know in what way it is possible to exchange a large amount of money without presenting a personal document for identification purposes.
20. Client presents only photocopies of identification documents.
21. Client tries to prove his identity in another way rather than presenting a required identification document.

22. Client presents identification documents which were all issued in a foreign country and there are reasons for which it is not possible to verify their authenticity.

