

Saatja: Kullus - Anton Fessenko <anton.fessenko@kullus.com>
Saadetud: 19.01.2024 14:37
Adressaat: RAB rahapesu <info@fiu.ee>
Koopia: <anton.fessenko@kullus.com>
Teema: Kullus OÜ - KYC/AML/CTF procedure clarifying question

Tähelepanu!

Kiri saabus väljastpoolt a metit/RM valitsemisala. Palume linke ja faile mitte avada, kui kiri on saabunud tundmatult aadressilt!

Fm : Kullus Ltd.

Mob : +372 5757 0340

Tel: +372 6352454

E-Mail: operations@kullus.com

To: Financial Intelligence Unit of Republic of Estonia

Inquiry

Dear representatives of the Financial Intelligence Unit of Republic of Estonia

I am reaching out with an inquiry on behalf of our company, Kullus OÜ, reg nr. 10526186, VATID EE100199280, engaged in ship agency services (type of activity of business Tegevusala: Muud veetransporti teenindavad tegevusalad, EMTAK kood: 52229 (EMTAK 2008), NACE kood 52). Specifically, we provide services for vessels arriving in the territory of Estonia.

We would like to seek clarification regarding KYC/AML/CTF procedures in our industry, considering that we are not a financial institution and not a bank and not financial advisors.

In connection with this, we kindly request clarification on the following questions:

1. Are we obligated to conduct KYC/AML/CTF procedures for our shipowner clients, given that we do not provide financial services but engage in ship agency, providing services for vessels arriving in Estonia?
2. If the answer to the first question is affirmative, to what extent should these procedures be conducted, considering the specifics of our activities?
3. We are considering the possibility of using company checks against the FATF, OMFC, and EU sanctions lists. Is this sufficient to comply with KYC/AML requirements?

Currently, we conduct checks on shipowners and vessels using the following sources:

- Checking the country of the shipowner's company against the FATF blacklist (<https://www.fatf-gafi.org/en/countries.html>).
- Checking the company and cargo on the vessel for sanctions imposed by Estonia, the EU, and the United States using the following links:

* *Rahvusvahelise sanktsiooni seadus* <https://www.riigiteataja.ee/akt/108032022003>

* *Regulation (EU) No. 833/2014* <https://eur-lex.europa.eu/legal-content/En/TXT/HTML/?uri=CELEX:02014R0833-20230624>

* *OFAC, Sanctions List Search* <https://sanctionssearch.ofac.treas.gov/>

* *OFAC Sanctions Lists* <https://ofac.treasury.gov/ofac-sanctions-lists>

* *Specially Designated Nationals and Blocked Persons List (SDN)* <https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>

* *Other OFAC Sanctions Lists* <https://ofac.treasury.gov/other-ofac-sanctions-lists>

We appreciate your attention to this inquiry and look forward to your recommendations.

Best Regards,

Anton Fessenko

Juhatuse liige

Küllus OÜ

Tel Estonian: +372 635 2454

Mob Estonian: +372 5757 0340

E-mail: anton.fessenko@kullus.com

This e-mail (including any attachments) may contain confidential, proprietary or privileged information. It may be read, copied and used only by the intended recipient. If you are not the intended recipient of this message you must not use, disseminate or copy it in any form or take any action in reliance on it. If you have received this e-mail in error, please notify the sender immediately by return e-mail. Please then delete the e-mail and any copies of it and do not disclose the contents to any person. We believe but do not warrant, that this e-mail and any attachments are virus free. You should take full responsibility for virus checking. Kullus Ltd and its affiliated companies reserve the right to monitor all email communications through their internal and external networks.

Kullus Ltd may contact you from time to time about products and services that we feel are relevant to your business. If you do not want to receive marketing emails from Kullus Ltd, please [Email Us!](#)