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Adressaat: RAB rahapesu <info@fiu.ee>

Teema: [SUSPECTED SPAM] Clarification on Reporting Requirements for Indirect Sanction Transactions

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Tähelepanu!

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

Lugupeetud rahapesubüroo!

Loodan, et see sõnum leiab teid hästi üles.

Kirjutan, et saada selgitusi riiklike riskihindamise ja aruandlusnõuete kohta nii EL-i kui ka OFAC-i kaudsete sanktsioonide tehingute puhul, eriti stsenaariumide puhul, kus sanktsiooniga kokkupuude on vähem kui 25% hoiatatud tehingusummast kaugkokkupuutega, st rohkem kui ühe teenuse vahel.

Meie organisatsioon on pühendunud kõikidele regulatiivsetele nõuetele täieliku vastavuse säilitamisele ning meie jaoks on ülioluline tagada, et meie isu ja aruandlusprotsessid oleksid vastavuses regulatiivsete ootustega. Oleme kokku puutunud olukorraga konsultantide ja tööstuse esindajatega, kes on sarnast nõu küsinud.

Konteksti lisamiseks tehke järgmist.

Mõistame, et otseseid tehinguid, mis hõlmavad sanktsioneeritud üksusi või üksikisikuid, tuleb eskaleerida, uurida ja teatada.

Siiski otsime selgust vahendajate kaudu toimuvate kaudsete tehingute regulatiivsete nõuete osas, eriti kui tehing on kaugelt nähtav.

Oleme tänulikud teie abi eest nende küsimuste selgitamisel. Nende nüansside mõistmine aitab meil täiustada oma vastavusprotokolle ja tagada, et täidame oma regulatiivseid kohustusi täpselt.

Täname teid sellele päringule tähelepanu pööramise eest. Ootame teie kiiret vastust.

Dear Money Laundering Bureau,

I hope this message finds you well.

I am writing to seek clarification regarding the national risk assessment and reporting requirements for both EU and OFAC indirect sanction transactions, specifically in scenarios where the sanction exposure is less than 25% of the alerted transaction amount with remote exposure i.e. more than one service inbetween.

Our organization is committed to maintaining full compliance with all regulatory requirements, and it is crucial for us to ensure that our appetite and reporting processes align

with regulatory expectations. We have encountered a situation with consultants and industry players who have sought similar advice.

To provide more context:

- We understand that direct transactions involving sanctioned entities or individuals must be escalated, investigated, and reported.
- However, we are seeking clarity on the regulatory requirements for indirect transactions that occur through intermediaries, particularly when the transaction is remotely exposed.

We appreciate your assistance in clarifying these matters. Understanding these nuances will help us enhance our compliance protocols and ensure that we are fulfilling our regulatory obligations accurately.

Thank you for your attention to this inquiry. We look forward to your prompt response.

Best regards,

Harrison Carey
Member of the Management Board
Pay Perform OÜ

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Chief Information Officer

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