

## Annex 2 – Transaction Descriptions (non-exhaustive)

### Matter Types and Activities

(for extended definition of the matter types set out below, refer to the glossary published by the Financial Action Task Force: <http://www.fatf-gafi.org/glossary/>)

(for interpretation of specified activities, refer to Money Laundering and Terrorist Financing Vulnerabilities of Legal Professionals, published by FATF:

<http://www.fatf-gafi.org/media/fatf/documents/reports/ML%20and%20TF%20vulnerabilities%20legal%20professionals.pdf>

- (a) buying and selling real property, including:
  - (i) mortgage advice;
  - (ii) arranging finance;
  - (iii) introducing client to financial institutions or other professionals;
- (b) managing of client monies, whether through a client account or otherwise, and including:
  - (i) cash, vouchers, cryptocurrencies or equivalents;
  - (ii) bearer cheques;
  - (iii) debt recovery;
  - (iv) structuring payments or purchases of any kind;
  - (v) assisting in obtaining financial services or loans;
- (c) managing of securities, including:
  - (i) issuing, buying, selling or repurchasing stocks, shares, bonds or any other security;
  - (ii) brokerage or agency services;
  - (iii) nominee arrangements;
- (d) managing assets, including:
  - (i) tax advice;
  - (ii) devising ownership structures;
  - (iii) administration of deceased estates;
  - (iv) insolvency services;
  - (v) receiving and holding client monies or assets in a client account;
  - (vi) nominee arrangements;

- (vii) buying or selling businesses;
- (viii) managing real estate, leases and rents;
- (ix) managing high value items such as yachts and aircraft;
- (e) management of bank, savings or securities accounts, including:
  - (i) opening accounts;
  - (ii) making introductions to financial institutions;
  - (iii) coordinating several bank accounts;
  - (iv) powers of attorney;
  - (v) acting as a signatory;
  - (vi) nominee arrangements;
- (f) organisation of contributions for the creation, operation or management of companies, including:
  - (i) share offerings and transfers;
  - (ii) subscriptions;
  - (iii) contributions to capital of any kind;
  - (iv) acquisitions and mergers of companies;
  - (v) bye-laws;
  - (vi) shareholder agreements;
  - (vii) director services;
  - (viii) registered office;
  - (ix) corporate secretarial services;
  - (x) nominee arrangements;
  - (xi) powers of attorney;
  - (xii) management services of any kind;
  - (xiii) introductions to financial institutions;
  - (xiv) insolvency services;

but excluding any such service which may be provided solely by any separate legal person which may be affiliated with the Applicant and which is duly licensed under the Corporate Services Provider Business Act 2012;

- (g) creation of legal persons or arrangements, including:
  - (i) the settlement of trusts, unit trusts or investment funds and pooling arrangements of any kind;
  - (ii) formation of partnerships of any kind;

- (iii) joint ventures;
- (iv) complex structures of any kind;
- (v) setting up charities;
- (h) operation of legal persons or arrangements, including:
  - (i) acting as a trustee;
  - (ii) managing a trust;
  - (iii) managing a partnership;
  - (iv) managing or co-ordinating a joint-venture;
  - (v) managing a charity;
  - (vi) powers of attorney;
  - (vii) dealings with or on behalf of trust beneficiaries;
  - (viii) dealings with or on behalf of partners or joint venturers;
  - (ix) trust disputes and enforcement;
  - (x) partnership disputes and enforcement;
  - (xi) joint venture disputes and enforcement;
  - (xii) insolvency services;

but excluding any such service which may be provided solely by any separate legal person which may be affiliated with the Applicant and which is duly licensed under the Trusts (Regulation of Trust Business) Act 2001.

