

STATE SECURITY DEPARTMENT OF THE REPUBLIC OF LITHUANIA

Attn.:

Bank of Lithuania
Department of Cultural Heritage
Insurance Supervisory Commission of the Republic of Lithuania
Securities Commission of the Republic of Lithuania
Gaming Control Authority
Lithuanian Bar Association
Chamber of Notaries
Chamber of Auditors
Lithuanian Chamber of Bailiffs
Lithuanian Assay Office
Financial Crime Investigation Service

INFORMATION ON AVAILABLE TERRORIST FINANCING IDENTIFICATION CRITERIA

In pursuance of the requirements of Clause 3 of Article 6(1) of the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania (Official Gazette 1997, No. 64-1502, 2008 No. 10-335), we hereby provide the information on the available terrorist financing identification criteria.

These criteria supplement the criteria, established in the List of Criteria, pursuant to which a monetary operation or transaction is to be regarded as suspicious or unusual, approved by the Resolution No. 677 of the Government of the Republic of Lithuania dated 9 July 2008 (Official Gazette, 2008, No. 82-3258), as well as the List of Criteria, pursuant to which a customer is deemed to pose a small threat of money laundering and / or terrorist financing and criteria based on which a threat of money laundering and / or terrorist financing is considered to be great approved by the Resolution No. 942 of the Government of the Republic of Lithuania dated 24 September 2008 (Official Gazette, 2008, No. 114-4348).

ENCLOSED. Information on available terrorist financing identification criteria, 1 page.

General Manager at interim

/signature/

Alvydas Kunigėlis

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Transactions or monetary operations as well as whether a customer or a beneficiary can be related to terrorist financing, if a customer's or a beneficiary's place of birth, place of residence, citizenship, nationality, legal entity's registered office, place of conclusion of transaction, place of operating activities is related to the states, where terrorist organizations are active, and if a transaction, customer, or beneficiary satisfies the following criteria of unusual operations and customer behavior:

1. monetary operations or transactions are mostly only performed between natural persons and legal entities related to the states, where terrorist organizations are active;
2. only cash transactions of international transfers from the states, where terrorist organizations are active, are performed on the accounts or cash deposited is transferred to the states, where terrorist organizations are active;
3. use of payment cards in the states, where terrorist organizations are active;
4. transactions are performed in the currency of the states, where terrorist organizations are active;
5. transactions with non-profit organizations;
6. authorized capital of the company is transferred to the state, where terrorist organizations are active, or cashed out;
7. subject of transaction – military equipment, items of dual purpose, strategic items;
8. cash remittance without opening an account and money orders to the persons, who do not have affinity or economic relations;
9. documents, submitted by a customer or a beneficiary, are unclear, raise doubts as to authenticity, unduly drawn, containing discrepancies or errors;
10. a customer does not have accurate information on the activities or transactions, declared by him, uses the assistance of third persons;
11. it is complicated to get in touch with a customer or a beneficiary, customer's contact details and place of residence is changed frequently;
12. possibility for several authorized persons, who do not have family or partnership relations, to use the account;
13. a customer acts through an authorized person without being present at the transactions and continually being abroad;
14. frequent change of persons, entitled to manage the account or perform transactions;
15. there are grounds for suspecting that a customer declares fictitious economic activities or takes such other steps with a view to groundlessly obtain a residence permit in Lithuania;
16. accounts are opened in different names of natural persons or legal entities by indicating the same registration address;
17. there is data available that a customer or a beneficiary is related to terrorist activities (satisfies the list of terrorists, published by other states, information received from public sources, etc.).