

RED FLAG INDICATORS FOR PAWNBROKER

A. General

- Pawner admits or makes statements about involvement in criminal activities.
- Pawner does not want correspondence sent to home address.
- Pawner is accompanied and watched by another person / other people.
- Pawner shows uncommon curiosity about internal systems, controls and policies.
- Pawner presents confusing details about the loan/transaction or knows few details about its purpose.
- Pawner over justifies or explains the loan/transaction.
- Pawner gives conflicting accounts as regards the purpose of the loan/transaction.
- Pawner's home or business telephone number has been disconnected or there is no such number when an attempt is made to contact pawner shortly after transaction was made.
- Pawner appears to be acting on behalf of a third party, but does not tell you.
- Pawner provides the particulars and contact details of owner of the pledge but the owner could not be contacted using the given contact details (or the contact details appear to be invalid).
- Pledge offered from pawning does not appear to be owned by the pawner but pawner insisted that it is his/hers (e.g. a male pawner offering a female watch for pawning and when queried, claimed that the watch is his).
- Pawner insists that a transaction be done quickly and that the identification and verification processes be done away with.
- The transaction does not appear to make sense or is out of keeping with usual or expected activity for the pawner.
- Pawner attempts to develop close rapport with staff yet appears to hide his true intentions.
- Pawner spells his or her name differently from one loan/transaction to another.
- Pawner provides false information or information that you believe is untrue.
- Pawner is the subject of a money laundering or terrorist financing investigation.
- There is information from a reliable source (that can include media or other open sources), that the pawner is suspected of being involved in illegal activity.
- There is adverse information concerning the pawner where he is listed on the UNSCR lists (terrorist, pirates, genocide), sanctions list or the customer

appeared in media articles indicating his investigation, arrest, prosecution or conviction;

B. Knowledge of reporting or record keeping requirements

- Pawner attempts to convince employee not to complete any documentation or verification required for the transaction.
- Pawner makes inquiries that would indicate a desire to avoid reporting.
- Pawner has unusual knowledge of the law in relation to suspicious transaction reporting.
- Pawner seems unusually conversant with money laundering or terrorist activity financing issues.
- Pawner is quick to volunteer that repayment funds are “clean” or “not being laundered.”
- Pawner appears to be structuring amounts (loans or payments) to avoid record keeping, client identification or reporting thresholds.

C. Identity documents

- Pawner provides doubtful or vague and unverifiable documents (e.g. proof of purchase / original receipts that appear shady).
- Pawner does not resemble the photograph in his personal identification document
- Pawner produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate.
- Pawner refuses to produce personal identification documents.
- Pawner only submits copies of personal identification documents and is not able to produce the originals.
- Pawner expects the staff to establish identity using something other than his or her personal identification documents.
- All identification documents presented appear new or have recent issue dates.
- Pawner presents different identification documents at different times.
- Pawner’s residential address does not correspond with domicile or employment status.

D. Cash transactions

- Pawner starts taking frequent loans in large amounts when this has not been a normal activity for the pawner in the past.
- Pawner makes multiple pledges in close successions for an aggregated loan of a substantial value, redeeming the pledges way before the due date and unable to provide a reasonable explanation on the source of funds used for repayment (such a behaviour, if repetitive, may attract a higher suspicion).

- Pawner uses notes in denominations to make repayments that are unusual for the pawner (i.e. repayment in notes of SGD \$1,000 or \$10,000).
- Pawner presents notes that are packed or wrapped in a way that is uncommon for the pawner.
- Pawner presents significant excessive funds for repayment without bothering to count them, which suggests that the source is doubtful.
- Pawner applies for a loan of an amount that is unusual compared with amounts of past transactions.