

## NOTIFICATION

Labuan Financial Services Authority (Labuan FSA) has taken enforcement actions on the following Labuan Licensed Entities for AML/CFT related non-compliances from July 2018 to June 2026.

Date of Action Taken	Name of Entity/ License	Provision Contravened	Nature of non-compliances (among others)	Actions Taken
15 Aug 2022	Alfa Asset Group Limited / Money Broker	<p>Para 8.1 &amp; 11.0 of Guidelines on Money Broking Business in Labuan IBFC</p> <p>Section 28B of the Labuan Financial Services Authority Act 1996</p>	<p>Failure to:</p> <ul style="list-style-type: none"> <li>i. comply with minimum capital requirement.</li> <li>ii. submit information and Statistical Management System (SMS) report including AML/CFT Form</li> </ul>	Revocation of Licence
14 July 2022	Select Investment Company Limited / Money broker	Para 11.0 of Guidelines on Money Broking Business in Labuan IBFC	Failure to submit SMS report including AML/CFT Form and Audited Financial Statements.	Revocation of licence
14 July 2022	SG Advisory Limited / Money Broker	<p>Breach of Section 19 (4) of Anti Money Laundering, Anti- Terrorism Financing and Proceeds of Unlawful Activities Act 2001</p> <p>Circular on Information on Designated of Compliance Officer</p> <p>Para 27.4.9 of Guidelines on Anti-Money Laundering and Counter Financing of Terrorism – Banking Sector</p> <p>Para 8.1 &amp; 11.1 of Guidelines on Money Broking Business in Labuan IBFC</p>	<p>Failure to:</p> <ul style="list-style-type: none"> <li>i. appoint compliance officer (CO) or designated compliance officer (DCO).</li> <li>ii. comply with minimum capital requirement and submit Audited Financial Statements.</li> </ul>	Suspension of Business
27 May 2022	Archipelago Life Insurance Limited / Life Insurance	<p>Section 16(4) of Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001</p> <p>Para 12.2 13.8, 25 &amp; 12.4 of the Guidelines on Anti-money Laundering and Counter</p>	<p>Failure to:</p> <ul style="list-style-type: none"> <li>i. make available evidence on on-going due diligence on existing clients.</li> </ul>	Administrative Penalty of RM610,000.00

Date of Action Taken	Name of Entity/ License	Provision Contravened	Nature of non-compliances (among others)	Actions Taken
		Financing Terrorism for Insurance and Takaful Sectors  Para 5,6,7 & 8 of the Guidelines on Risk-Based Approach (RBA) for The Purpose of AML/CFT	ii. maintain listing on screening against United Nations Security Council resolution (UNSCR) and Ministry of Home Affairs (MOHA).  iii. make available Risk Matrix criteria for client's rating.  iv. make available the evidence on overall risk assessment on AML/CFT risk based on customers, countries or geographical areas and products, services, transaction or delivery channels.	
27 May 2022	Archipelago Insurance Limited / General Insurance	Breach of Section 16 of Anti-Money Laundering, Anti- Terrorism Financing and Proceeds of Unlawful Activities Act 2001  Para 13, 12.2, 12.4 & 25 of the Guidelines on Anti-money Laundering and Counter Financing Terrorism for Insurance and Takaful Sectors  Para 5, 6, 7, 8 & 9 of Guidelines On Risk-Based Approach (RBA) for The Purpose of AML/CFT	Failure to:  i. carry out complete client due diligence (CDD), including failure to obtain complete information and/or supporting documents from clients for CDD purposes.  ii. conduct Enhanced CDD (ECDD) on Politically Exposed Person (PEP).  iii. make available evidence on on-going due diligence on existing clients.  iv. maintain listing on screening against UNSCR and MOHA.  v. make available Risk Matrix criteria for client's rating.  vi. make available the evidence on overall risk assessment on AML/CFT risk based on customers, countries or geographical areas and products, services, transaction or delivery channels.	Administrative Penalty of RM250,000
17 Dec 2021	Caps Solution Ltd / Money Broker	Para 13.4 & 27.4.2 of Guidelines on Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) – Banking Sector	Failure to undertake adequate customer due diligence screening and process.  The DCO did not have sufficient stature, authority and seniority within the reporting institution to participate and	Suspension of Business

Date of Action Taken	Name of Entity/ License	Provision Contravened	Nature of non-compliances (among others)	Actions Taken
		<p>Para 9.1 (v) of Guidelines on Money Broking Business in Labuan IBFC</p> <p>Para 13.1 of Reporting Guidelines on Statistical Data Submission for Labuan Entities</p>	<p>be able to effectively influence decisions relating to AML/CFT.</p> <p>Failure to have in place a proper dispute mechanism and complaint handling procedure.</p> <p>Inaccurate SMS submission.</p>	
25 Sept 2018	MGK Global Limited / Money Broker	<p>Breach of Section 19 (4) of Anti Money Laundering, Anti- Terrorism Financing and Proceeds of Unlawful Activities Act 2001</p> <p>Circular on Information on Designated of Compliance Officer</p> <p>Para 27.4.9 of Guidelines on Anti-Money Laundering and Counter Financing of Terrorism – Banking Sector</p> <p>Para 8.1 &amp; 11.1 of Guidelines on Money Broking Business in Labuan IBFC</p>	<p>Failure to:</p> <ul style="list-style-type: none"> <li>i. appoint CO or DCO.</li> <li>ii. comply with minimum capital requirement and submit Audited Financial Statements.</li> </ul>	Suspension of Business
27 July 2018	Golden Sunrise Finance Broking Company Limited / Insurance Broker	<p>Section 4 of Labuan Financial Services &amp; Securities Act 2010</p> <p>Para 6.2 of Guidelines on Fit and Proper Persons Requirement</p>	The person in control did not comply with fit and proper requirement.	Revocation of Licence

Date of Action Taken	Name of Entity/ License	Provision Contravened	Nature of non-compliances (among others)	Action Taken
20 February 2025	AMS Trust Company Limited / Trust Company	<ol style="list-style-type: none"> <li>1. Item B.1.6 of Paragraph 6.18 of the Guidelines on Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Labuan Key Reporting Institutions (AML/CFT/CPF and TFS for Labuan KRIs) dated 21 May 2024 (Guidelines).</li> <li>2. Item B.5.1 of Paragraph 10.22(i) of the Guidelines.</li> <li>3. Item B.5.4 of Paragraph 10.61 reads together with Item B.9 and Item B.7.3, Paragraph 12.9 of the Guidelines.</li> <li>4. Paragraph 3.2 reads together with Paragraph 8.2 of the Guidelines for Labuan Trust Officer dated 24 November 2017.</li> <li>5. Paragraph 6.1.1 (v) of the Guidelines on Compliance Function for Labuan Licensed Entities dated 6 November 2013.</li> </ol>	<p>Failure to:</p> <ol style="list-style-type: none"> <li>1. conduct risk profiling on its customers and assign the money laundering, terrorism financing and proliferation financing ("ML/TF/PF") risk rating that commensurate with their risk profile.</li> <li>2. identify the customer and verify its identity through the name, legal form and proof of existence, such as Memorandum / Article / Certificate of Incorporation / Constitution / Partnership Agreement or any other reliable references to verify the identity of the customer.</li> <li>3. perform Enhanced Customer Due Diligence ("ECDD") where ML/TF/PF risks are assessed as higher risk.</li> </ol>	Administrative Penalty in accumulative amount of RM112,000

		6. Paragraph 6.2 (ii) of the Governance and Market Conduct Framework for Labuan Trust Companies Guidelines dated 21 August 2015.	<p>4. ensure that the Trust Officer discharging his duties, for effective Customer Due Diligence, including ECDD for high-risk clients, in accordance with the Guidelines.</p> <p>5. ensure the Board of Director discharging their roles and responsibilities.</p> <p>6. ensure sufficient resources to carry out the compliance function.</p>	
2 December 2025	UBB Amanah (Labuan) Limited / Managed Trust Company	<p>1. Paragraph 6.4, 6.9, 6.11, 6.16, 6.18, 7.5(i) and (iv), 7.6, 7.7 (vii), 7.16 (i), (ii), (iii) and (iv) of Guidelines on Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Labuan Key Reporting Institutions (AML/CFT/CPF and TFS for Labuan KRIs).</p> <p>2. Section 19(4) of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities 2001.</p>	<p>Failure to:</p> <p>1. take appropriate steps to identify, assess and understand their Money Laundering / Terrorism Financing / Proliferation Financing (“ML/TF/PF”) risks.</p> <p>2. have adequate policies, procedures and controls to manage and mitigate ML/TF/PF risks that have been identified.</p>	Administrative Penalty of RM35,000

			<p>3. conduct risk profiling on its customers and assign ML/TF/PF risk rating commensurate with their risk profile.</p> <p>4. ensure the Board of Director, Senior Management and Compliance Officer discharging their roles and responsibilities with regards to AML/CFT compliance as per the guidelines.</p>	
2 December 2025	UBB Investment Bank Limited / Investment Bank	<p>1. Paragraph 6.4, 6.9, 6.11, 6.16, 6.18, 7.5(i) and (iv), 7.6 and 7.16 (i), (ii), (iii) and (iv) of Guidelines on Anti-Money Laundering, Countering Financing of Terrorism, Countering Proliferation Financing and Targeted Financial Sanctions for Labuan Key Reporting Institutions (AML/CFT/CPF and TFS for Labuan KRIs).</p> <p>2. Paragraph 1.1 of Guidelines on the Establishment of Labuan Marketing Office (LMO)</p>	<p>Failure to:</p> <p>1. take appropriate steps to identify, assess and understand their Money Laundering / Terrorism Financing / Proliferation Financing (“ML/TF/PF”) risks;</p> <p>2. have adequate policies, procedures and controls to manage and mitigate ML/TF/PF risks that have been identified;</p>	Administrative Penalty of RM35,000

			<ol style="list-style-type: none"><li>3. conduct risk profiling on its customers and assign ML/TF/PF risk rating commensurate with their risk profile.</li><li>4. ensure the Board of Director, Senior Management and Compliance Officer discharging their roles and responsibilities with regards to AML/CFT compliance as per the guidelines.</li><li>5. comply with Guidelines on the Establishment of Labuan Marketing Office (LMO)</li></ol>	
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