



**Circular to Money Service Operators**

**Supplementary Guideline on Criteria for Determining Fitness and Propriety,  
Guidelines for Submission of Business Plan, and  
Guidelines for Submission of Anti-Money Laundering and Counter-Terrorist  
Financing (“AML/CFT”) Policy**

This is to inform you that the Customs and Excise Department (“C&ED”) published the following guidelines on 8 January 2020.

(1) Supplementary Guideline on Criteria for Determining Fitness and Propriety

This supplementary guideline must be read in conjunction with the Guideline on Criteria for Determining Fitness and Propriety for determining whether an applicant for a licence to operate a money service or a licensee is a fit and proper person, and it aims to provide examples to further understanding of any applicant or licensee in this respect.

(2) Guidelines for Submission of Business Plan

These guidelines set out key elements that should be included in the business plan to let the C&ED have a comprehensive understanding of the applicant or licensee’s proposed money service business and its mode of operation so as to further enhance the effectiveness of regulatory regime of the money service operator (MSO) sector.

(3) Guidelines for Submission of AML/CFT Policy

These guidelines aim to provide practical guidance to assist applicants or licensees to draw up their own policies, procedures and controls in the relevant operational areas, taking into consideration of their proposed business plan and special circumstances so as to meet the relevant AML/CFT statutory and regulatory requirements.

MSO licence applicants and licensees are advised to take note of the above guidelines which are available on the C&ED’s website at [https://eservices.customs.gov.hk/MSOS/index?request\\_locale=en](https://eservices.customs.gov.hk/MSOS/index?request_locale=en).

Should you have any queries regarding the contents of this circular, please contact us at 2707 7837.

Money Service Supervision Bureau  
Customs and Excise Department

End