

## Regulations Concerning Verification of Client Identity and Retention of Records

(Adopted on December 20, 2012: Regulations No. 154)

Amended on January 22, 2016

Amended on May 6, 2016

Amended on September 16, 2016

Amended on March 16, 2017

Amended on December 21, 2017

Amended on August 24, 2018

Amended on October 24, 2018

Amended on January 17, 2019

Amended on November 22, 2019

Amended on December 20, 2019

Amended on August 20, 2020

### Article 1. (Purpose)

1. These Regulations are intended to stipulate the matters based on the delegation pursuant to the provisions of Paragraph 4, Article 11 and Article 13 of the Rules Concerning Verification of Client Identity and Retention of Records (No. 95 of the Federation Rules; hereinafter referred to as the “Rules”).

2. The terms used in these Regulations shall have the meanings used in the Rules.

### Article 2. (Amount of Assets Relating to Asset Management Acts That Require Client Identity Verification)

The amount prescribed in Paragraph 1 of Article 2 of the Rules shall be 2,000,000 JPY.

### Article 3. (Special Provisions for Identity of Client that is a Natural Person)

Such circumstances that are stipulated in Paragraph 1 of Article 2 of the Rules shall be the cases set forth in each following item below and such matters that are stipulated in the said paragraph shall be the matters as provided for in respect of the relevant case:

(1) When Attorneys find it impossible or extremely difficult to prove their address or data of birth because the client who is a natural person is abroad: name, passport number and such other information that a business operator in that foreign country confirms to identify the client; and

(2) When a client who is a natural person is in custody in a penal detention facility due to having been arrested, taken into detention, serving a sentence or other reasons: items stated by the courts in order to

identify the client in a document that indicates the grounds for the client's custody.

Article 4. (Special Provisions for Identity Verification Method)

Such circumstances that are stipulated in Item 5 of Paragraph 3 of Article 2 of the Rules shall be the cases set forth in each following item below and such method that is stipulated in Item 5 of Paragraph 3 of Article 2 of the Rules shall be the method as provided for in respect of the relevant item:

(1) When Attorneys may not verify the identity using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules or send Mail Not Requiring Forwarding by Registered Mail because the client is abroad, the method that a business operator in that foreign country uses for verifying identity of clients, or otherwise the method that is equally reliable as the method set forth in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules; and

(2) When a client is in custody at a penal detention facility due to arrest, detention, or serving a sentence or other reasons, the method of receiving delivery or access to documents such as a copy of detention warrant and written judgment, in which the court indicates the basis for body restraint of the client, that states identity of the client.

Article 5. (Persons Equivalent to Those Who Occupy Important Positions or Countries not Having Adequately Established a System for Prevention of Transfer of Criminal Proceeds)

1. Persons provided for in Item 3 a) of Article 3 of the Rules shall be such persons who had been the head of a foreign state or who had occupied important position in the government of a foreign state, and are considered as having high risks of a transfer of criminal proceeds, taking into consideration the degree of influence that may be given by the said person as well as the relevance between the position assumed by said person in the past and his/her current duties.

2. Countries and regions stipulated in Item 4 of Article 3 of the Rules are Iran and North Korea.

Article 6. (Method of Identity Verification for Natural Persons)

1. Methods provided for in the provisions of Paragraph 1 of Article 4 of the Rules shall be the method set forth below:

(1) The method that confirms the Natural Person Concerned has possessed a power of attorney or any other document attesting that the Natural Person Concerned has been engaged in Asset Management Acts or Transactions for the client;

(2) The method that confirms the Natural Person Concerned has been registered as an officer with the authority to represent the client; or

(3) The method that confirms the authority of the Natural Person Concerned by means of making a

phone call to the head office, the principal place of business or business place of the client.

2. The Method stipulated in the provisions of Paragraph 2 and Paragraph 4 of Article 4 of the Rules shall be a method that verifies the identity of the Natural Person Concerned according to the methods stated in each item of Paragraph 3 of Article 2 of the Rules; provided, however, that Attorneys may send the Engagement Agreement to the head office, business place, or other location where the client concerned works instead of the home of the Natural Person Concerned.

#### Article 7. (Entities Whose Identities are Confirmed)

Entities stipulated in Item 3 of Paragraph 3 of Article 4 of the Rules shall be as follows.

- (1) Incorporate administrative agencies;
- (2) Juridical persons in which a national or local government has contributed more than 50% of capital, funds, or other money pursuant thereto;
- (3) Foreign governments, foreign governmental institutions, foreign local governments, foreign central banks or international institutions of which Japan is a member; and
- (4) Entities that are listed on or registered with stock exchanges that trade securities (excluding markets in countries and regions provided for in Paragraph 2 of Article 5).

#### Article 8. (Details of Verification Records)

Details stipulated in the provisions of Paragraph 1 of Article 5 of the Rules shall be as follows.

- (1) Name of the person that conducted the identity verification and other matters that are sufficient to identify such person; and
- (2) Measures adopted in order to confirm identity and the date and time at which identity verification documents are presented.

#### Article 9. (Details of Transaction Records)

Details stipulated in the provisions of Paragraph 2 of Article 5 of the Rules shall be as follows.

- (1) Matters in order to search client identity verification records;
- (2) Date(s) of the Asset Management Acts or Transactions
- (3) Type(s) of the Asset Management Acts or Transactions
- (4) Value of property relating to the Asset Management Acts or Transactions
- (5) In case the Asset Management Acts or Transactions involve a transfer of property, name(s) of the transferring entity and the receiving entity (meaning the initial transferring entity and the final receiving entity relating to such transfer of property which is known to the Attorneys who carry out a part of the transaction, act, or procedures relating to such transfer of property, and the same shall apply hereinafter)

and such other matters that are sufficient to identify the transferring entity and the receiving entity.

Article 10. (Measures to Ensure Implementation of Preventive Measures)

Measures provided for in Item 5 of Article 9 of the Rules shall be measures set forth below:

(1) Review of Asset Management Acts or preparation for or carrying out of Transactions that the Attorneys conduct and analyzing the same, and using the results of such investigation and analysis to change the measures as necessary.

(2) Collection, sorting out and analysis of such information that is necessary to implement Measures for Identity Verification, taking into consideration National Risk Assessment of Money Laundering and Terrorist Financing.

(3) Continuous and careful examination of the verification records and transaction records taking into consideration the result of the review and analysis of Item 1.

(4) When Attorneys collect, sorting-out and analyze information pursuant to Item 2 with respect to Asset Management Acts or preparation for or carrying out of Transactions that fall under each item of Article 3 of the Rules, preparing for a document stating the results thereof and keeping them together with the verification records and transaction records.

(5) Conducting an audit necessary for adequate implementation of Measures for Identity Verification.

Article 11. (Form of Annual Report)

1. The form stipulated in Paragraph 4, Article 11 of the Rules shall be the appended form or such other form that has not altered the matters to be reported and that is approved by the Federation.

2. The attachment stipulated in Paragraph 4, Article 11 of the Rules shall be materials to make prima facie showing the reason with respect to Attorneys who have not practiced law during the previous fiscal year due to reasons listed below (as to legal profession corporations and registered foreign legal profession corporations, meaning the reasons pertaining to their members):

(1) Childbirth

(2) Childcare

(3) Disease

(4) Injury

Article 12 (Method for Submitting Annual Report)

The submission method in Paragraph 4, Article 11 of the Rules shall be methods listed below:

(1) Physical delivery;

(2) Posting;

- (3) Transmission by facsimile;
- (4) Website; and
- (5) Transmission via e-mail.

#### Supplementary Provisions

1. These Regulations shall come into force as from March 1, 2013.
2. In light of the damages caused by the heavy rainfall in July 2018, notwithstanding the provisions of Article 4, as a temporary measure until identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules becomes possible, for the time being, a case when identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules is difficult due to the client's being a person who resides in, or has the head office or principal place of business in an area of municipality where the Disaster Relief Act (Act No.118 of 1947) was applied for the heavy rainfall in July 2018 shall be deemed to be a case stipulated in the Regulations provided in Items 5 of Paragraph 3 of Article 2 of the Rules, and the method of receiving a report from a natural person if the client is a natural person, or from a representative, agent, or employee of the juridical person who made the request and performs other matters if the client is a juridical person (hereinafter referred to as "Method of Identity Verification by Reporting") shall be deemed to be the method stipulated in the Regulations provided in Item 5 of Paragraph 3 of Article 2 of the Rules. In such a case, Attorneys shall conduct Identity Verification for such client using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules without delay when it becomes possible to conduct Identity Verification using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules.
3. In light of the damages caused by the 2018 Hokkaido Eastern Iburi Earthquake, notwithstanding the provisions of Article 4, as a temporary measure until identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules becomes possible, for the time being, a case when identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules is difficult due to the client's being a person who resides in, or has the head office or principal place of business in an area of municipality where the Disaster Relief Act was applied for the 2018 Hokkaido Eastern Iburi Earthquake shall be deemed to be a case stipulated in the Regulations provided in Items 5 of Paragraph 3 of Article 2 of the Rules, and the Method of Identity Verification by Reporting shall be deemed to be the method stipulated in the Regulations provided in Item 5 of Paragraph 3 of Article 2 of the Rules. In such a case, Attorneys shall conduct Identity Verification for such client using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules without delay when it becomes possible to conduct Identity Verification using the method

stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules.

4. In light of the damages caused by the 2019 typhoon No.19, notwithstanding the provisions of Article 4, as a temporary measure until identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules becomes possible, for the time being, a case when identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules is difficult due to the client's being a person who resides in, or has the head office or principal place of business in an area of municipality where the Disaster Relief Act was applied for the 2019 typhoon No.19 shall be deemed to be a case stipulated in the Regulations provided in Items 5 of Paragraph 3 of Article 2 of the Rules, and the Method of Identity Verification by Reporting shall be deemed to be the method stipulated in the Regulations provided in Item 5 of Paragraph 3 of Article 2 of the Rules. In such a case, Attorneys shall conduct Identity Verification for such client using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules without delay when it becomes possible to conduct Identity Verification using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules.
5. In light of the damages caused by the heavy rainfall in July 2020, notwithstanding the provisions of Article 4, as a temporary measure until identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules becomes possible, for the time being, a case when identity verification using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules is difficult due to the client's being a person who resides in, or has the head office or principal place of business in an area of municipality where the Disaster Relief Act was applied for the heavy rainfall in July 2020 shall be deemed to be a case stipulated in the Regulations provided in Items 5 of Paragraph 3 of Article 2 of the Rules, and the Method of Identity Verification by Reporting shall be deemed to be the method stipulated in the Regulations provided in Item 5 of Paragraph 3 of Article 2 of the Rules. In such a case, Attorneys shall conduct Identity Verification for such client using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules without delay when it becomes possible to conduct Identity Verification using the method stipulated in Item 1 and Item 2 of Paragraph 3 of Article 2 of the Rules.
6. Attorneys shall, when conducting Identity Verification by Reporting and reviewing the purpose of request stipulated in Paragraph 1 of Article 6 of the Rules, or the purpose of custody stipulated in Paragraph 1 of Article 8 of the Rules, considering that identity verification cannot be conducted using identity verification documents of a natural person or identity verification documents of a juridical person, perform more careful review on whether the purpose of such request or custody relates to transfer of criminal proceeds, such as by sufficiently scrutinizing the reason for such request or custody and other circumstances.

Supplementary Provisions (Amended on January 22, 2016)

The amended provisions of Article 3 through Article 5, Paragraph 1 of Article 6, and Article 10 (newly established) shall become effective on the date of enforcement of the Act to Partially Amend the Act on the Prevention of Transfer of Criminal Proceeds (Act No. 117 of 2014). (To be enforced as of October 1, 2016 under Cabinet Order of 337 of 2015)

Supplementary Provisions (Amended on May 6, 2016)

(Effective Date)

1. The amended provisions of the supplementary provisions shall become effective on May 6, 2016 and become applicable from April 22, 2016.

(Interim Measures)

2. Concerning application of Paragraph 2 of the Supplementary Provisions for the Regulations Concerning Verification of Client Identity and Retention of Records after amendment by these amended provisions until the previous day of the date of enforcement of partial amendment (resolved at the Board of Directors on January 22, 2016) of the Regulations Concerning Verification of Client Identity and Retention of Record (Regulations No. 154), “Items 1 and 2 of Paragraph 3 of Article 2 of the Rules” shall be replaced with “Items 1 through 3 of Paragraph 3 of Article 2 of the Rules” and “Item 5 of Paragraph 3 of Article 2 of the Rules” shall be replaced with “Item 4 of Paragraph 3 of Article 2 of the Rules”.

Supplementary Provisions (Amended on September 16, 2016)

The amended provisions of Item 4 of Article 7 shall become effective on October 1, 2016.

Supplementary Provision (Amended on March 16, 2017)

Amended provisions of the Supplementary Provision shall become effective on April 1, 2017.

Supplementary Provision (Amended on December 21, 2017)

Amended provisions of Paragraph 1, Article 1, Article 11 (newly established), Article 12 (newly established) and appended form (newly established) shall become effective on January 1, 2018.

Supplementary Provisions (Amended on August 24, 2018)

The amended provisions of the supplementary provisions shall become effective on August 24, 2018 and become applicable from July 13, 2018.

Supplementary Provisions (Amended on October 24, 2018)

The amended provisions of the supplementary provisions shall become effective on October 24, 2018 and become applicable from September 14, 2018.

Supplementary Provisions (Amended on January 17, 2019)

The amended provisions of the Appended Form shall be effective as of January 17, 2019.

Supplementary Provision (Amended on November 22, 2019)

The amended provisions of Paragraph 4 and 5 of the supplementary provisions shall become effective on November 22, 2019 and become applicable from October 18, 2019.

Supplementary Provision (Amended on December 20, 2019)

The amended provisions of the Appended Form shall be effective as of December 20, 2019.

Supplementary Provision (Amended on August 20, 2020)

The amended provisions of Paragraph 5 and 6 of the supplementary provisions shall become effective on August 20, 2020 and become applicable from July 10, 2020.



Annual Report

To: President of Bar Association

I (the corporation) hereby report such matters that are listed in Paragraph 1, Article 11 of the Rules Concerning Verification of Client Identity and Retention of Records (hereinafter referred to as the “Rules”) during the reporting period stated below.

Reporting period: From April 1, YYYY until March 31, YYYY

1. Working Conditions as Attorneys

Working conditions as Attorneys (Item 1, Paragraph 1, Article 11 of the Rules) during the reporting period is as follows.

(Please mark  in one of the applicable item)

- (i) I practiced law as Attorneys throughout or part of the period;
- (ii) I performed duties of the organization to which I belong as an in-house Attorneys throughout the period; or → to Question 3
- (iii) I was absent from practicing law as Attorneys throughout the period due to the following reasons (as to legal profession corporations and registered foreign legal profession corporations, meaning the reasons pertaining to their members). → to Question 6
  - a. Advanced age
  - b. Childbirth (\*)
  - c. Childcare (\*)
  - d. Disease (\*)
  - e. Injury (\*)
  - f. Study abroad
  - g. Other reasons (Please mention concretely in the following)

\* In the case of falling under “b. Childbirth”, “c. Childcare”, “d. Disease” or “e. Injury”, attach materials making prima facie showing the reasons.

2. Implementation of Measures for Identity Verification

Implementation of Measures for Identity Verification (Articles 2 through 5 of the Rules) is as follows (Item 2, Paragraph 1, Article 11 of the Rules).

- (1) Implementation of identity verification pursuant to the provisions of Articles 2 through 4 of the Rules is as follows.

Note 1. Identity verification is required not at the time of acceptance, but when Attorneys conduct Asset Management Acts or prepare for or carry out Transactions. Therefore, if you conduct Asset Management Acts or prepare for or carry out Transactions during the reporting period, they must be reported even if you accepted the client's instruction before the reporting period. Please select answer from (ii) to (iv) below (no multiple answers).

Note 2. Regardless of whether you verify identification only when it is required, or you verify identification of all clients, if there were no legal matters during the reporting period, mark  in option (i).

Note 3. If you did not consider if the verification is required review and did not verify the clients' identification, mark  in option (iv).

(Please mark  in one of the applicable items)

- (i) There were no legal matters which required the verification of clients' identity;
- (ii) I (we) verify only when verification of client's identity is required;
- (iii) I (we) verify identification of all clients regardless of whether it is required; or
- (iv) I (we) did not verify clients' identification. → to Question 3

[Examples of legal matters which require the verification of clients' identity]

■ Taking custody of assets of 2 million yen or more such as;

- A demand for a refund from a money lender of overpayment without going through judicial proceedings, and receiving the refund at the attorney's deposit account;
- A claim for damage resulting from a traffic accident without going through judicial proceedings, and receiving a payment from an insurance company to the attorney's deposit account; and
- Represent an heir with regard to division of inherited property without going through judicial proceedings, and accept taking custody of compensation to be paid by the client or the other party.

■ Preparation for or carrying out of certain transactions (including cases where you are not involved in the transfer of funds) such as;

- A sale of real property in conjunction with division of inherited property;
- An M&A; and
- An incorporation of a corporation.

(2) I (we) determine the necessity of identity verification and record retention pursuant to the provisions of Article 2 through 5 of the Rules using the following means.

(Please mark  in all applicable items)

- (i) I (we) prepare paper medium such as a checklist for identity verification;
- (ii) I (we) introduce a computer system for identity verification; and / or

(iii) Other means (Please describe below).

(Note: Using the means set forth in (i) or (ii) is not obligatory. When (i) or (ii) is not applicable, check (iii) and describe the means in sufficient detail.)

(3) Implementation of retention of identity verification records and transaction records pursuant to the provision of Article 5 of the Rules with respect to cases where identity of clients were verified pursuant to the provisions of Article 2 through 4 of the Rules prior to or during the reporting period is as follows.

Note 1. Even if you select (i) for Question “2. (1)”, please select one of the answers from (i) to (iv) on the retention of identity verification records and transaction records if you verified clients identity, conducted Asset Management Acts or prepared for or carried out Transactions prior to the reporting period.

Note 2. If you select (i) for Question “2. (1)” and you have not conducted retention of records pursuant to Article 5 of the Rules (because there were no legal matters which required verification of clients identity prior to the reporting period, or because the record retention period stated in Article 5 of the Rule (five years after completion) for past legal matters which required verification of clients identity has passed prior to the reporting period, or because of other circumstances), please mark  in (iv).

Note 3. If you retain both identity verification record and transaction record pursuant to Article 5 of the Rules, mark  in (i).

(Please mark  in one of the applicable items)

- (i) I (we) retain the identity verification records as well as the transaction records of Asset Management Acts and Transactions (Paragraph 1 and 2, Article 5 of the Rules);
- (ii) I (we) retain only the identity verification records (Paragraph 1, Article 5 of the Rules);
- (iii) I (we) retain only the transaction records of Asset Management Acts and Transactions (Paragraph 2, Article 5 of the Rules); or
- (iv) I (we) do not retain any records. → to Question 3

(4) I (we) use the following means to retain identity verification records and transaction records pursuant to the provision of Article 5 of the Rules.

(Please mark  in all applicable items)

- (i) I (we) use model format for client identity verification and record retention prepared by the Japan Federation of Bar Associations;
- (ii) I (we) introduce a computer system for client identity verification and record retention; and / or
- (iii) Others (Please describe below in sufficient detail).

(Note: Using the means set forth in (i) or (ii) is not obligatory. When (i) or (ii) is not applicable, check (iii) and provide a brief description.)

### 3. Implementation of proper response when and after accepting instructions for legal matters

#### I. Proper response when accepting instructions for legal matters

Implementation (Item 3, Paragraph 1, Article 11 of the Rules) of proper response when accepting instructions for legal matters (Article 6 of the Rules) is as follows.

(1) When I (we) accept instructions for legal matters, as to whether purpose of the instruction for legal matters relates to a transfer of criminal proceeds or not:

- (i) I (we) review the same;
- (ii) There was an instruction or instructions for legal matter, but I (we) did not review the same; and / or → to Question II
- (iii) There were no instruction for legal matter, so I (we) did not review the same. → to Question II

(Please mark  in one of the applicable item)

(2) As a result of the review, there are instructions which were considered to have related to a transfer of criminal proceeds:

- (i) Yes; or
- (ii) No → to Question II

(Please mark  in one of the applicable item)

(3) As to the instruction which was considered to have related to a transfer of criminal proceeds, I (we) responded as follows.

(Please mark  in one of the applicable item)

- (i) I (we) refused to accept the instruction(s);
- (ii) I (we) did not refuse to accept the instruction(s); or
- (iii) I (we) refused to accept some instruction(s) and did not refuse to accept the other instruction(s).

II. Proper response after accepting legal matters

Implementation (Item 3, Paragraph 1, Article 11 of the Rules) of proper response after accepting legal matters (Article 7 of the Rules) is as follows.

(1) After accepting instructions for legal matters from clients, there is or are case(s) to which I (we) become aware that the purpose of said instruction relates to a transfer of criminal proceeds:

- (i) Yes; or
- (ii) No → to Question 4

(Please mark  in one of the applicable item)

(2) After I (we) become aware that the purpose of instruction relates to a transfer of criminal proceeds, I (we) responded as follows.

(Please mark  all applicable items)

- (i) I (we) explained it as being illegal and persuaded to abandon pursuit of the purpose, accordingly the client abandoned the pursuit of the purpose; → to Question 4
- (ii) I (we) explained it as being illegal and persuaded to abandon pursuit of the purpose, however the client did not abandon; → to Question (3)
- (iii) I (we) explained it as being illegal, however did not persuade to abandon pursuit of the purpose; and / or → to Question 4
- (iv) I (we) neither explained it as being illegal nor persuaded to abandon pursuit of the purpose. → to Question 4

(Note. If (ii) was marked with , please answer Question (3) below.)

(3) As to the clients who did not abandon pursuit of the purpose notwithstanding my (our) persuasions, I (we) responded as follows.

(Please mark  in one of the applicable item)

- (i) Withdrew from the legal matters;
- (ii) Did not withdraw from the legal matters;
- (iii) Withdrew from some legal matters and did not withdraw from the other legal matters;  
or
- (iv) Others (Please describe below in sufficient detail).

4. Implementation of proper response when taking custody of assets for non-legal matters

Implementation (Item 4, Paragraph 1, Article 11 of the Rules) of proper response (Article 8 of the Rules) when taking custody of assets including money for non-legal matters during the course of my practice as Attorneys is as follows.

(1) There are cases where I (we) was requested to take custody of assets including money with no relation to legal matters:

- (i) Yes; or
- (ii) No → to Question 5 (for in-house Attorneys who marked  in (ii) of Question 1, move to a column of reporting date at the end of the document)

(Please mark  in one of the applicable item)

(2) When requested to take custody of assets including money, I (we) have examined whether the purpose of such custody relates to a transfer of criminal proceeds or not:

- (i) Yes; or
- (ii) No → to Question (4)

(Please mark  in one of the applicable item)

(3) As a result of my (our) examination, I (we) considered that the requests were considered to have related to a transfer of criminal proceeds:

- (i) Yes; or
- (ii) No

(Please mark  in one of the applicable item)

(4) There are cases where I (we) was requested to take custody of assets including money which are not related to legal matters, and I (we):

- (i) Accepted the requests; (→ for in-house Attorneys who marked  in (ii) of 1, move to Question (8))
- (ii) Did not accept the requests; or → to Question 5 (for in-house Attorneys who marked  in (ii) of 1, move to a column of reporting date at the end of the document)
- (iii) There are requests which I (we) accepted and did not accept. (→ for in-house Attorneys who marked  in (ii) of 1, move to Question (8))

(Please mark  in one of the applicable item)

(5) When taking custody of assets which are not related to legal matters, I (we) verified the identity of a person who is requesting for the custody of assets:

- (i) Yes;

- (ii) No; or → to Question (7)
- (iii) There are requests to which I (we) verified the identity and did not verify the identity.  
(Please mark  in one of the applicable item)

(6) As to documents received for verification when having taken custody of assets which are not related to legal matters:

- (i) I (we) retain them;
- (ii) I (we) do not retain them; or
- (iii) There are requests for which I (we) retain documents and for which I (we) do not retain documents.

(Please mark  in one of the applicable item)

(7) As to documents which describe the relevant assets taken into custody:

- (i) I (we) retain them;
- (ii) I (we) do not retain them; or
- (iii) There are requests for which I (we) retain documents and for which I (we) do not retain documents.

(Please mark  in one of the applicable item)

(8) There are cases to which I (we) become aware that the purpose of custody relates to a transfer of criminal proceeds after having taken custody of assets:

- (i) Yes; or
- (ii) No → to Question 5 (for in-house Attorneys who marked  in (ii) of 1, move to a column of reporting date at the end of the document)

(Please mark  in one of the applicable item)

(9) After having known that the purpose of custody relates to a transfer of criminal proceeds, I (we) responded as follows:

(Please mark  in all applicable items)

- (i) I (we) explained it as being illegal and persuaded to abandon pursuit of the purpose, accordingly the person who deposited assets including money abandoned the pursuit of the purpose;
- (ii) I (we) explained it as being illegal and persuaded to abandon pursuit of the purpose, however the person who deposited assets including money did not abandon;
- (iii) I (we) explained it as being illegal, however did not persuade to abandon pursuit of the purpose;
- (iv) I (we) neither explained it as being illegal nor persuaded to abandon pursuit of the

purpose; and / or

- (v) Other responses (Please describe below in sufficient detail).

(→for in-house Attorneys who marked  in (ii) of 1, do not answer Questions 5 and 6, and move to a column of reporting date at the end of the document)

5. Implementation of measures to ensure implementation of preventive measures

Implementation (Item 5, Paragraph 1, Article 11 of the Rules) of measures to ensure Measures for Identity Verification (Article 9 of the Rules and Article 10 of the Regulations) is as follows.

I (we) take the following measures to ensure Measures for Identity Verification.

(Please mark  in all applicable items)

- (i) Updating and keeping current the information pertaining to the matters to which identity is verified;
- (ii) Education and training to staff;
- (iii) Preparation of rules concerning implementation of the Measures for Identity Verification;
- (iv) Appointment of a person who audit and supervise and manage other operations those are necessary for adequate implementation of the Measures for Identity Verification;
- (v) Review of Asset Management Acts or Transactions that I (we) conduct, prepares for or carries out and analyzing the same, and using the results of such investigation and analysis to change the measures as necessary;
- (vi) Collection, sorting out and analysis of such information that is necessary to implement Measures for Identity Verification, taking into consideration National Risk Assessment of Money Laundering and Terrorist Financing;
- (vii) Continuous and careful examination of the verification records and transaction records taking into consideration the result of my (our) review and analysis;
- (viii) When I (we) collect, sorting-out and analyze information pursuant with respect to Asset Management Acts or preparation for or carrying out of Transactions, preparing for a document stating the results thereof and keeping them together with verification records and transaction records;
- (ix) Conducting an audit necessary for adequate implementation of the Measures for Identity Verification; and / or
- (x) I (we) have not taken any of measures listed in (i) through (ix)

→ to a column of reporting date at the end of the document



6. Non-implementation of measures or response listed in Items 2 through 5, Paragraph 1, Article 11 of the Rules.

(Please mark )

I (we) have not implemented any measures or response listed in Items 2 through 5, Paragraph 1, Article 11 of the Rules because I (we) did not practice as Attorneys throughout the entire period.

Reporting date		MM	DD	YY
Name or attorney	Registration number or notification number			
Name of law office				
Address of law office				

Note 1. If you use professional name, please write the professional name.

Note 2. If you are a legal profession corporation or a registered foreign legal profession corporation, please write names and addresses of all offices located in the region of the Bar Association to which this report is to be submitted.

Personal information you have submitted will be strictly managed in accordance with the Federation's rules concerning personal information. The Federation may, in some cases, statistically process and analyze personal information, and publish the result thereof in such manner that an individual may not be identified.