

Regulations Concerning Client Identity Verification and Record Preservation, Etc.

(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

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 Client Identity Verification and Record Preservation, Etc. (No. 95 of the Federation Rules; hereinafter referred to as the “Rules”).

2. The terms used in these Regulations shall be in accordance with terms used in the Rules.

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

The amount prescribed in the provisions of 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)

If it is provided for in the provisions stipulated in Paragraph 1 of Article 2 of the Rules, the cases set forth in each following item shall be applicable, and the matters provided for in the provisions stipulated in the said paragraph shall be the matters as provided for in the relevant each item in accordance with the classification of the case set forth in the relevant each item:

(1) When a client that is a natural person is unable or finds it extremely difficult to prove their address or data of birth due to being abroad: items that an operator verifies in order to identify the natural person in such country such as their name or passport number, etc.

(2) When a client that is a natural person is in custody in a penal detention facility due to having been arrested, taken into detention, or serving a sentence, etc.: 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)

If it is provided for in the provisions stipulated in Item 5 of Paragraph 3 of Article 2 of the Rules, the cases set forth in each following item shall be applicable, and the methods provided for in Item 5 of Paragraph 3 of Article 2 of the Rules shall be the methods as provided for in the relevant each item in accordance with the classification of the case set forth in the relevant each item:

(1) When identity verification is not possible using methods stated in Items 1 or 2 of Paragraph 3 of Article 2 of the Rules due to the client's being abroad, or when it is not possible to send Mail Not Requiring Forwarding by Registered Mail, etc., the method that a business operator uses for verifying identity in the said foreign country, 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

(2) When a client is in custody at a penal detention facility due to reasons such as arrest, detention, or serving a sentence, etc., 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 Public Positions or Countries Acknowledged as not Having Adequately Established a System Concerning the Prevention of Transfer of Criminal Proceeds)

1. The persons provided for in the provisions stipulated in Item 3 a) of Article 3 of the Rules shall be the persons who had been the head of foreign state or one who had occupied important position in the government of foreign state, and are considered as being highly likely to be involved in 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 the provisions of 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, etc. or Transactions, etc. 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

(3) The method that confirms requesting 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 is 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 the Engagement Agreement, etc. to be sent to the Natural Person Concerned may be sent to the head office, sales office, or other location acknowledged as being a place at which the client concerned conducts work in substitute for being sent to the home of the Natural Person Concerned.

Article 7. (Entity that Actually Exists)

Entities stipulated in the provisions of 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
- (4) Entities that are listed or registered on markets that trade securities (excluding markets in countries and regions provided for in Paragraph 2 of Article 5)

Article 8. (Contents 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 verifier
- (2) Measures adopted in order to confirm identity and the date and time at which identity verification documents are presented

Article 9. (Contents 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, etc. or Transactions, etc.
- (3) Type(s) of the Asset Management Acts, etc. or Transactions, etc.
- (4) Value of property relating to the Asset Management Acts, etc. or Transactions, etc.
- (5) Name(s) of the transferring entity or the receiving entity (meaning the original transferring entity or the final receiving entity relating to such transfer of property to the extent known when the work undertaken by Attorneys, etc. is to execute a part of the transaction, act, or procedures relating to such

transfer of property, and the same shall apply hereinafter) relating to the transfer of property in the Asset Management Acts, etc. or Transactions, etc. involving the transfer of property, and other matters that are sufficient to identify the transferring entity or the receiving entity relating to such transfer of property.

Article 10. (Measures to Accurately Implementing Steps for Identity Verification)

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

- (1) Investigating preparation or implementation of Asset Management Acts, etc. or Transactions, etc. that the client himself/herself carries out and analyzing the same, and reviewing the results of such investigation and analysis as necessary and making alteration thereto.
- (2) Gathering, sorting out and analyzing necessary information when taking measures for identity verification, etc., taking into consideration the content of the survey report on the degree of risk of criminal proceeds transfer.
- (3) Closely examining the confirmation records and transaction records on a continuous basis taking into consideration the result of the investigation and analysis of Item 1.
- (4) When gathering, sorting-out and analysis of information is conducted pursuant to the provisions of Item 2 with respect to preparation or implementation of Asset Management Acts, etc. or Transactions, etc. that fall under each item of Article 3 of the Rules, preparing a document stating the results thereof and keeping them together with the confirmation records and transaction records.
- (5) Conducting audit necessary for adequate implementation of measures for identity verification.

Article 11. (Form, Etc. of Annual Report)

1. The form provided for by the regulations stipulated in Paragraph 4, Article 11 of the Rules shall be the appended form or the form approved by the Federation, which has no alteration to the matters to be reported as set forth in the appended form.

2. The attachment provided for by the regulation stipulated in Paragraph 4, Article 11 of the Rules shall be materials to make prima facie showing the reason with respect to Attorneys, etc. who have not performed duties as Attorneys, etc. 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 provided for by the regulation stipulated in Paragraph 4, Article 11 of the Rules shall be methods listed below:

- (1) Method of bringing it
- (2) Method of mailing it
- (3) Method of transmitting it by facsimile
- (4) Method of inputting it to website
- (5) Method of transmitting it by attaching to 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 Item 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, etc. 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 (Act No.118 of 1947) 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, etc. 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. Attorneys, etc. 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)

(Date of Enforcement)

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 Client Identity Verification and Record Preservation, Etc. 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 Client Identity Verification and Record Preservation, Etc. (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.

Annual Report

To: President of Bar Association

Pursuant to the provision of Article 11 of the Rules Concerning Client Identity Verification and Record Preservation, Etc. (hereinafter referred to as the “Rules”), I (the corporation) hereby report as follows concerning the matters listed in each item of Paragraph 1 of the said article during the reporting period stated below.

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

1. Working state as Attorneys, etc.

Working state as Attorneys, etc. (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) Have conducted practice of Attorneys, etc. through the entire or part of the period;
- (ii) Have conducted only business of an organization to which I (we) belong as an in-house Attorneys, etc. through the entire period; → to 3
- (iii) Have been absent from practice of Attorneys, etc. through the entire 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 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” of “e. Injury”, attach materials making prima facie showing the reasons.

2. Implementation status of Measures for Identity Verification, etc.

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

(1) Implementation status 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 conducting preparation or execution of Asset Management Acts, etc. and certain Transactions, etc. Therefore, if preparation or execution of Asset Management Acts, etc. or certain Transactions, etc. is included during the reporting period, they must be reported even if the date of acceptance is before the reporting period. Please select answer from (i) to (iv) below (no multiple answers).

Note 2. Notwithstanding if verification is performed only when identity verification is deemed to be required, or performed for all cases regardless of whether identity verification is required, if there were no legal matters during the reporting period, mark in option (i).

Note 3. If no review on requirement of identity verification was performed during the reporting period and identity verification was not performed, mark in option (iv).

(Please mark in one of the applicable items)

- (i) No legal matters, etc. requiring identity verification were entrusted
- (ii) I (we) verify only when determined identity verification is necessary
- (iii) I (we) verify all the cases regardless of the necessity of identity verification
- (iv) Have not implemented identity verification → to 3

[Reference: Specific example where identity verification is needed]

- Where taking custody of assets of 2 million yen or more
 - When demanding the refunding of overpayment without going through judicial proceedings, and receiving payment from a financial corporation to the deposit account
 - When claiming for damage resulting from a traffic accident without going through judicial proceedings, and receiving payment from an insurance company, etc. to the deposit account
 - When conducting an agreement on division of inherited property without going through judicial proceedings, and taking custody of compensation to be paid by the client or the other party
- Where preparing for or executing specific transactions, etc. (including the case where deposit of money is not received)
 - When selling real property at division of inherited property
 - When being involved with the company's M&A
 - When taking incorporation formality on behalf of the company

(2) I (we) judge the necessity of identity verification and record preservation 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
- (iii) Other means (Please mention concretely in the following)

(Note: Using the means set forth in options (i) or (ii) is not obligatory. When (i) or (ii) is not applicable, select (iii) and mention briefly the judgment method.)

(3) Implementation status of preservation of identity verification records and transaction records pursuant to the provision of Article 5 of the Rules where identity verification pursuant to the provisions of Article 2 through 4 of the Rules has been conducted during the reporting period and prior to the reporting period is as follows.

Note 1. Even where identity verification, preparation or execution of Asset Management Acts, etc. or certain Transactions, etc. is not included in the reporting period, if identity verification, preparation or execution of Asset Management Acts, etc. or certain Transactions, etc. is conducted before the reporting period, select options (i) to (iii) on the status of preservation of identity verification records and transaction records for them.

Note 2. If option (i) was selected for “2. (1)” and there were no legal matters requiring identity verification before the reporting period, preservation of records pursuant to Article 5 of the Rules would not have been conducted, so mark in option (iii).

Note 3. If both identity verification record and transaction record is preserved pursuant to Article 5 of the Rules, mark in options (i) and (ii).

(Please mark in all applicable items)

- (i) I (we) preserve records of identity verification (Paragraph 1, Article 5 of the Rules)
- (ii) I (we) preserve transaction records of Asset Management Acts, etc. and Transactions, etc. (Paragraph 2, Article 5 of the Rules)
- (iii) I (we) do not preserve records → to 3

(4) I (we) use the following means to preserve 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 preservation prepared by the Japan Federation of Bar Associations
- (ii) I (we) introduce a computer system for client identity verification and record preservation

(iii) Others (Please mention concretely in the following)

(Note: Using the means set forth in options (i) or (ii) is not obligatory. When (i) or (ii) is not applicable, select (iii) and mention briefly the preservation method.)

3. Implementation status of proper response when and after accepting requests

I. Proper response when accepting requests

Implementation status (Item 3, Paragraph 1, Article 11 of the Rules) of proper response when accepting requests (Article 6 of the Rules) is as follows.

(1) When accepting requests for legal matters, as to whether purpose of the said requests relates to a transfer of criminal proceeds or not:

- (i) I (we) review it
- (ii) There was a request for legal matter, but I (we) did not review it. → to II
- (iii) There were no requests for legal matter, so I (we) did not review it. → to II

(Please mark in one of the applicable item)

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

- (i) Yes
- (ii) No → to II

(Please mark in one of the applicable item)

(3) As to the requests which were determined 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 requests
- (ii) I (we) did not refuse to accept the requests
- (iii) There are requests which I (we) refused and did not refuse to accept

II. Proper response after accepting requests

Implementation status (Item 3, Paragraph 1, Article 11 of the Rules) of proper response after

accepting requests (Article 7 of the Rules) is as follows.

(1) After accepting requests for legal matters from clients, there are cases to which I (we) become to know that the purpose of said requests relates to a transfer of criminal proceeds:

- (i) Yes
- (ii) No → to 4

(Please mark in one of the applicable item)

(2) After having known that the purpose of requests 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 avoid realizing the purpose, accordingly the client accepted persuasion → to 4
- (ii) I (we) explained it as being illegal and persuaded to avoid realizing the purpose, however the client did not accept persuasion → to (3)
- (iii) I (we) explained it as being illegal, however did not persuade to avoid realizing the purpose → to 4
- (iv) I (we) neither explained it as being illegal nor persuaded to avoid realizing the purpose → to 4

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

(3) As to the clients who refused to accept persuasion, to whom I (we) have persuaded to avoid realizing the purpose, becoming to know that the purpose of requests relates to a transfer of criminal proceeds after accepting the requests, we responded as follows.

(Please mark in one of the applicable item)

- (i) Resigned
- (ii) Did not resign
- (iii) There are requests to which I (we) resigned and did not resign
- (iv) Others (Please mention concretely in the following)

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

(1) There are cases where I (we) was requested to take custody of assets including money, etc.

with no relation to legal matters:

- (i) Yes
- (ii) No → to 5 (for in-house Attorneys, etc. 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)

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

- (i) Yes
- (ii) No → to (4)

(Please mark in one of the applicable item)

(3) As a result of the review, there are requests which were determined to have related to a transfer of criminal proceeds:

- (i) Yes
- (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, etc. with no relation to legal matters, and I (we):

- (i) Accepted the requests (→ for in-house Attorneys, etc. who marked in (ii) of 1, move to (8))
- (ii) Did not accept the requests → to 5 (for in-house Attorneys, etc. 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, etc. who marked in (ii) of 1, move to (8))

(Please mark in one of the applicable item)

(5) When taking custody of money, etc. with no relation to legal matters, I (we) have conducted identity verification of a person intending to deposit the said asset:

- (i) Yes
- (ii) No → to (7)
- (iii) There are requests to which I (we) conducted and did not conduct identity verification

(Please mark in one of the applicable item)

(6) As to documents delivered when having taken custody of money, etc. with no relation to legal matters and conducted identity verification:

- (i) I (we) preserved them
 - (ii) I (we) did not preserve them
 - (iii) There are requests for which we preserved and did not preserve documents
- (Please mark in one of the applicable item)

(7) As to documents in which outline of the relevant asset custody is described when having taken custody of money, etc. with no relation to legal matters:

- (i) I (we) preserved them
 - (ii) I (we) did not preserve them
 - (iii) There are requests for which we preserved and did not preserve documents
- (Please mark in one of the applicable item)

(8) There are cases to which I (we) become to know that the purpose of deposit relates to a transfer of criminal proceeds after having taken custody of money, etc.

- (i) Yes
 - (ii) No → to 5 (for in-house Attorneys, etc. 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 deposit is involved in 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 avoid realizing the purpose, accordingly the person who deposited assets including money, etc. accepted persuasion
- (ii) I (we) explained it as being illegal and persuaded to avoid realizing the purpose, however the person who deposited assets including money, etc. did not accept persuasion
- (iii) I (we) explained it as being illegal, however did not persuade to avoid realizing the purpose
- (iv) I (we) neither explained it as being illegal nor persuaded to avoid realizing the purpose
- (v) Other responses (Please mention concretely in the following)

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

5. Implementation status of measures to accurately take Measures for Identity Verification, etc.

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

I (we) take the following measures as measures to accurately conduct identity verification.

(Please mark in all applicable items)

- (i) Measures to update the latest information pertaining to the matters to which identity is verified
- (ii) Implementation of education and training to clerical staff
- (iii) Preparation of rules concerning implementation of the Measures for Identity Verification, etc.
- (iv) Election of a person supervising audit and other businesses necessary for adequate implementation of the Measures for Identity Verification, etc.
- (v) Researching and analyzing the preparation for or execution of Asset Management Acts, etc. and Transactions, etc. being carried out by myself, and reviewing the results of such research and analysis, and making modification as necessary
- (vi) Conducting the collection, arrangement, and analysis of information necessary when taking Measures for Identity Verification, etc., considering the content of a criminal proceeds transfer risk degree dossier
- (vii) Closely examining verification records and transaction records on a continuous basis, considering the results of research and analysis of the preparation for or execution of Asset Management Acts, etc. and Transactions, etc. being carried out by myself
- (viii) When conducted the collection, arrangement, and analysis of information necessary when taking Measures for Identity Verification, etc. with respect to preparation for or execution of Asset Management Acts, etc. and Transactions, etc. which require strict client management, considering the content of a criminal proceeds transfer risk degree dossier, preparing documents stating the results thereof and preserving them together with verification records and transaction records
- (ix) Conducting an audit necessary for accurately implementing Measures for Identity Verification, etc.
- (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 conducted measures or response listed in Items 2 through 5, Paragraph 1, Article 11 of the Rules due to the absence from practice of Attorneys, etc. through the entire period.

Reporting date MM DD YY

Name or appellation	Registration number or notification number
Name of office	
Address of 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 a document is to be submitted.

Personal information you have submitted will be strictly managed in accordance with the Federation's rules, etc. concerning personal information. The Federation may, in some cases, statistically process and analyze personal information, and publish the result thereof in state where specific individual cannot be identified.