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Financial Intelligence Office

2020 Annual Report



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DIRECTOR'S MESSAGE

Due to Coronavirus disease (COVID-19) pandemic in 2020, global economy and livelihood has been severely affected. Macao, as an export-oriented economy, would not be able to be isolated from the pandemic. During the initial outbreak of COVID-19, the rapid response of Macao Special Administrative Region (SAR) government in implementing the necessary pandemic prevention and isolation measures has been able to protect the overall health and wellbeing of Macao citizens.

Although the pandemic in Mainland China and Macao SAR has been effectively controlled, the global pandemic is still severe. With the dramatical drop in the number of tourists, Macao's economy will inevitably be affected. During the pandemic, various industries in Macao suffered obvious decline in their business, so the number of suspicious transaction reports (STRs) related to anti-money laundering (AML) activities decreased as well. Besides, the Financial Intelligence Office (*GIF*) conducted some international conferences and external trainings through virtual environment during the year in order to observe Macao SAR government's pandemic preventive measures.

In the global context, due to the vigorous and continuous impact of COVID-19 pandemic, global economy has also slowed down drastically in 2020. All jurisdictions are striving to stop the wide-spread of the pandemic with quarantine requirements, while also working so hard to boost economic recovery. Nevertheless, criminals exploit these economic downturns by means of numerous medical facility frauds, government subsidy scams, with intense use of cyber and virtual environment. These associate illicit fund flows hamper the endeavors of economic recovery by legitimate businesses. As such, the financial intelligence units, law enforcement agencies (LEAs) as well as supervisory agencies have to work together to suppress these detrimental behaviors.

When the going gets tough, the tough get going. Tackling money laundering (ML), terrorist financing (TF) and proliferation financing (PF) is never easy. With the AML/Combating the Financing of Terrorism (CFT)/Countering Proliferation Financing (CPF) Strategic Plan for 2021 to 2025 adopted in 2020, *GIF*, being one of the key AML/CFT/CPF competent authorities, remains vigilant to financial crime risks, in order to protect legitimate businesses from harms and unfair competition brought by criminals and fraudsters. A clean financial system will provide confidence for both domestic and international investors, thus facilitating the economic recovery at a much faster pace.

Director
Chu Un I, Connie

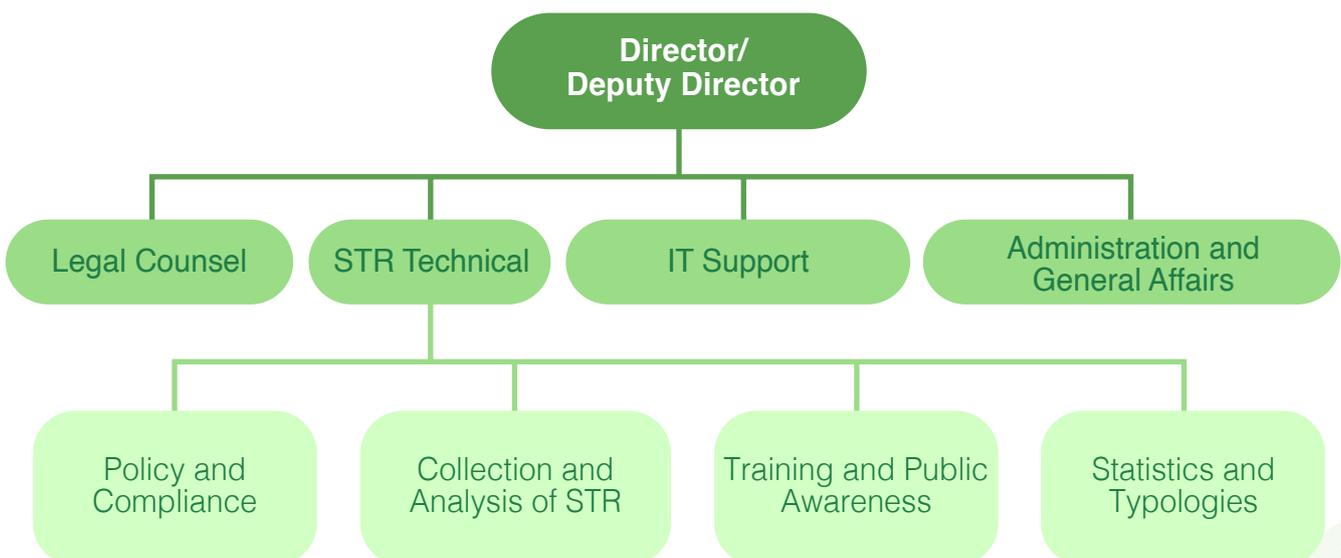
CHAPTER I BACKGROUND AND ORGANIZATION STRUCTURE

1.1 GIF's Organization Background

GIF was established on 8th August 2006 under Executive Ruling no. 227/2006 with the primary role of collecting, analyzing and disseminating information on suspicious transactions of ML and TF. It was established for coping with the implementation of Law no. 2/2006 and Law no. 3/2006 in force, on “Prevention and Suppression of Crimes of Money Laundering” and “Prevention and Suppression of Crimes of Terrorism”.

Under Executive Ruling no. 227/2006, GIF was set up in the form of a project entity with a term of 3 years that could be extended by Executive Ruling. The mandate of GIF was extended in May 2020 for two years until August 2022 by Executive Ruling no. 116/2020.

1.2 GIF's Organization Structure and Functions



The core function of *GIF* is to collect, analyze and disseminate relevant information to LEAs, judicial authorities or other entities vested with the authority to prevent and suppress crimes relating to ML or TF. In exercising such duties, *GIF* is granted with the following specific competence:

- To receive information provided in accordance with the prevalent Article 7 of the Administrative Regulation no. 7/2006 in force and to establish and maintain a database with such information;
- To analyse the information received and report the suspicious ML activities to the Public Prosecutions Office (*MP*);
- To provide assistance to LEAs, judicial authorities and other entities empowered to prevent and suppress ML and TF crimes, based on their requests with stated legitimate reasons, particularly in the form of information sharing and technical support;
- To provide to and receive from foreign entities information about ML and TF crimes, for the implementation of inter-regional agreements or any other international law instruments;
- To collaborate with public entities to establish and revise AML/CFT guidelines;
- To develop promotion and education programs for public awareness about AML/CFT;
- To furnish the Secretary for Security with an annual report on its activities.

1.3 Duties of *GIF*

The Director takes on the leadership, coordination and management responsibilities so as to fulfill the duties stipulated in paragraph 2 of Article 8 of Law no. 2/2006, paragraph 2 of Article 11 of Law no. 3/2006 in force, and Executive Ruling no. 227/2006.

The duties of *GIF* are categorized into 4 main areas: Policy and Compliance, Collection and Analysis of STRs, Statistics and Typologies and Training and Public Awareness. Such duties are performed with the support of the following 3 teams of back office staff: Legal Counsel, Information Technology (IT) Support and Administration and General Affairs.

Policy and Compliance

GIF has the duty to keep track of international developments and update the information on international standards, laws and conventions. It liaises on continual basis with international bodies such as Financial Action Task Force (FATF), Asia/Pacific Group on Money Laundering (APG), and the Egmont Group through the participation in the meetings of these professional bodies, commitments in the assessment missions of member jurisdictions, answer assessment questionnaires and enquiries in relation to AML/CFT. Domestically *GIF* follows up with the change in local laws and guidelines, and recommends new measures for keeping abreast with the latest developments in AML/CFT regime.

Collection and Analysis of STRs

GIF is responsible for collecting and analyzing STRs submitted by different reporting entities as well as inputting data collected through these STRs into the database. All incoming reports will be verified to ensure all data are properly filled in and a first feedback will be sent to the reporting entity accordingly. The initial feedback will be followed by subsequent follow-up replies if deemed necessary. At the same time analysis will be carried out, including data matching against existing records and intelligence provided by local law enforcement and foreign counterparts. *GIF* has been granted the authority to request additional information from reporting entities, if necessary, for in-depth analysis on any case, and to propose reported cases deemed suspicious to the *MP*.

Statistics and Typologies

GIF has to extract statistical data periodically from STRs received, as well as providing instructive information such as trends and typologies to the supervisory agencies. Analysis reports on typologies and transaction types will be prepared for internal and cross-departmental reference, and these reports may serve as insights for further policy review.

Training and Public Awareness

To arrange training and public awareness programs on AML/CFT is one of *GIF*'s important responsibilities. For this reason, *GIF* needs to search for suitable training resources provided by international bodies, arrange local courses by inviting experts from abroad, and take part in seminars and workshops overseas. At the same time, promotional campaigns by means of delivering AML/CFT trainings and seminars to reporting entities and public, broadcasting promotional videos on various platforms, as well as updating the content of WeChat Official Account of *GIF* and publication of newsletters on a regular basis are the common channels to raise public awareness about the importance of AML/CFT.

CHAPTER II TREND AND DEVELOPMENT OF SUSPICIOUS TRANSACTION REPORTS

2.1 Statistical Data

GIF continues to carry out its duties as provided under Executive Ruling no. 227/2006 to perform statistics on STRs data and detailed STRs cases analysis. Due to COVID-19 pandemic, there was a decline in total number of STRs received in 2020 as compared with 2019.

The total number of STRs received and their variances are as follows:

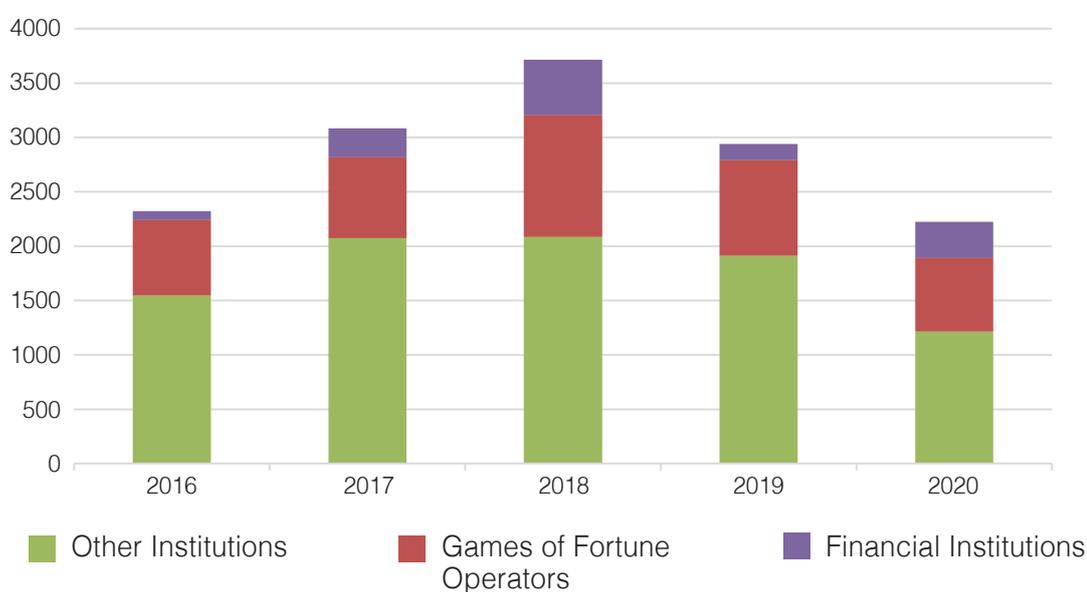
Year	Number of STRs	Variance
2016	2,321	+ 28.4%
2017	3,085	+ 32.9%
2018	3,716	+ 20.5%
2019	2,941	- 20.9%
2020	2,224	- 24.4%

Among all STRs received in 2020, the gaming sector submitted 1,215 reports, financial sector submitted 677 reports, and other institutions submitted 332 reports, which accounted for 54.6%, 30.4% and 15.0% respectively, and the total number of STRs has decreased by 24.4% as compared with the figure of 2019. The major reduction in number of STRs was from gaming sector. The outbreak of COVID-19 pandemic in 2020 not only severely affected the global economy, but also adversely affected the economy of Macao. The STRs submitted by the gaming sector and financial sector has decreased dramatically by 36.5% and 23.1% respectively. In contrast, the number of reports submitted by other institutions has increased significantly which reflected the continuous efforts on public awareness programs on AML/CFT carried out by *GIF* and members of interdepartmental AML/CFT Working Group to different sectors throughout the years. Although the number of reports submitted by other institutions increased, it could only partially offset the overall decline in the total number of STRs submitted. Statistical information relating to the number of STRs received in 2020 is given in Table 1 and Chart 1.

Table 1: Statistical Data of STRs Received from 2016 to 2020

Reporting Entity	Number of STRs					Variance '19 vs '20
	2016	2017	2018	2019	2020	
Financial Institutions	696	746	1,122	880	677	- 23.1%
Games of Fortune Operators	1,546	2,074	2,087	1,913	1,215	- 36.5%
Other Institutions	79	265	507	148	332	+124.3%
Total	2,321	3,085	3,716	2,941	2,224	- 24.4%

Chart 1: Number of STRs Filed by Sectors in 2016 - 2020



During 2020, *GIF* disseminated 92 STRs to *MP*, which has decreased by 48.6% as compared with 2019. With the adverse impact of COVID-19 pandemic to Macao's economy, not only the number of STRs received has been decreased, but also the number of STRs reported to *MP*.

2.2 Statistics on Recent Trends of Suspicious Transactions

“Irregular large cash withdrawals” was the most common typology in 2020. The second to sixth ranking included “Significant cash deposit with non-verifiable source of funds”, “Chips conversion without/with minimal gambling activities”, “Use of automated teller machine (ATM), phone banking, cash deposit machine (CDM)”, “Suspected to be engaged in illegal financial activities” and “Use of cheques/promissory notes/account transfer etc. to transfer funds”. These rankings were basically the same as in 2019. The reason was that *GIF* received a large number of STRs related to frequent use of ATM/CDM for cash withdrawal and exchange transactions in 2020. The top 10 most prevailing typologies (in terms of occurrence) in 2020 are given in the following Chart 2 and Table 2.

Chart 2: Ranking of Statistics on Typologies of STRs

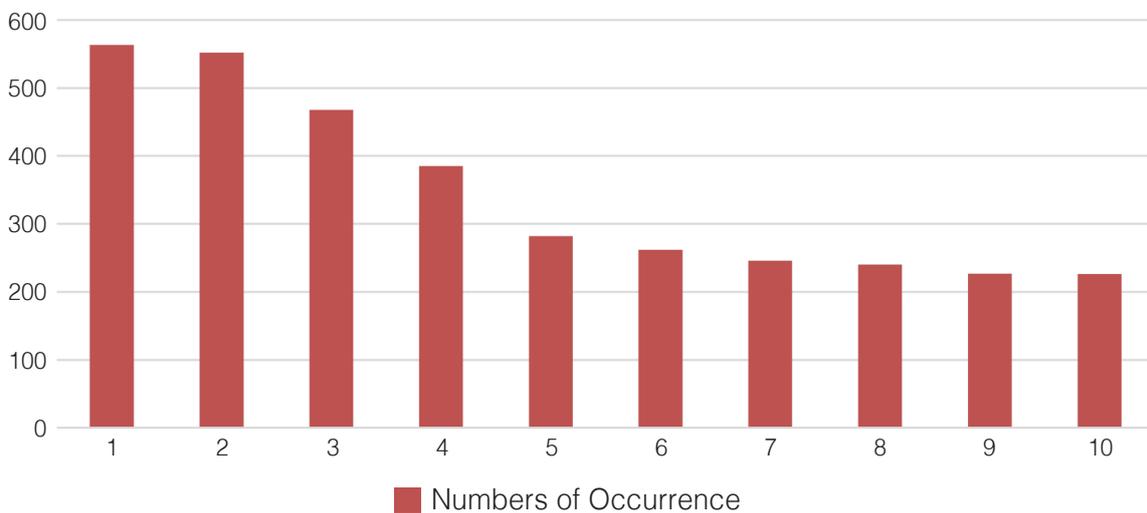


Table 2: Ranking of Statistics on Typologies of STRs (in order of occurrence)

Typologies		Number of STRs
1	Irregular large cash withdrawals	563
2	Significant cash deposit with non-verifiable source of funds	552
3	Chips conversion without/with minimal gambling activities	468
4	Use of ATM, phone banking, CDM	385
5	Suspected to be engaged in illegal financial activities	282
6	Use of cheques/promissory notes/account transfer etc. to transfer funds	262
7	Currency exchange/cash conversion	246
8	Possible match with International watch-list or other Black List	242
9	Chips conversion/marker redemption/gambling on behalf of third part(ies)	227
10	Suspicious wire transfers	226
11	Others*	1,542

* Other typologies including “Related to others crimes”, “Foreign exchange transactions with unidentified source of funds”, “Attempted but unsuccessful transaction”, “Gambling activities (casinos, horse racing, internet gambling etc.)” and “Use of online banking/internet”.

CHAPTER III COORDINATION OF ANTI-MONEY LAUNDERING AND COUNTER TERRORIST FINANCING WORK IN MACAO SAR

3.1 Coordination of the Interdepartmental AML/CFT Working Group

In order to strengthen the coordination work in the AML/CFT regime in Macao SAR, the Interdepartmental AML/CFT Working Group was established in 2002 and formalized in 2014. The AML/CFT Working Group is an interdepartmental group of different government agencies and judicial authorities and it has been working smoothly and closely for many years. Functions of the AML/CFT Working Group are specified as follows:

- (1) Coordination and follow-up of the works related to the evaluation and assessment of Macao SAR conducted by international and inter-regional AML/CFT organizations, especially in coordinating the collection of related necessary data;
- (2) Carrying out policy studies related to AML/CFT;
- (3) Provision of AML/CFT training and public awareness programs to the economic sectors involved in the fight against ML and TF;
- (4) Exchange of information on trends related to AML/CFT;
- (5) Establishment of special sub-Working Groups whenever deemed necessary for the study of some particular AML/CFT related issues.

The Interdepartmental AML/CFT Working Group continued to follow up all the AML/CFT related works in Macao SAR. *GIF* continues to be the coordinator of the Interdepartmental AML/CFT Working Group and meetings were held regularly. At present, the AML/CFT Working Group is comprised of 15 different agencies of supervisory, legal and law enforcement nature, including (in alphabetical order of Portuguese acronym):

- (1) Monetary Authority of Macao (*AMCM*)
- (2) Commission Against Corruption (*CCAC*)
- (3) Independent Committee for the Exercise of Disciplinary Power over Solicitors (*CIEPDSS*)
- (4) Public Security Force (*CPSP*)

- (5) Gaming Inspection and Coordination Bureau (*DICJ*)
- (6) Legal Affairs Bureau (*DSAJ*)
- (7) Economic and Technological Development Bureau (*DSEDT*)
- (8) Financial Services Bureau (*DSF*)
- (9) Housing Bureau (*IH*)
- (10) Macao Trade and Investment Promotion Institute (*IPIM*)
- (11) Public Prosecutions Office (*MP*)
- (12) Judiciary Police (*PJ*)
- (13) Macao Customs Service (*SA*)
- (14) Unitary Police Service (*SPU*) and
- (15) Financial Intelligence Office (*GIF*).

3.1.1 Interdepartmental Coordination

During 2020, *GIF* organized 2 Interdepartmental AML/CFT Working Group meetings and 18 meetings with individual government or supervisory agencies, including *AMCM*, *CCAC*, *DICJ*, *DSAJ*, *DSEDT*, *DSF*, *IH*, *MP*, *PJ*, *SA*, *SPU* and other judicial authorities like The Court of the Macao SAR. The following issues were discussed:

- Formulate and discuss the AML/CFT/CPF Strategic Plan (2021-2025) of the Macao SAR; (See Section 3.2)
- Initiate the 3rd round of ML/TF risk assessment by using the risk assessment tools from international organization, coordinate the scope of the data collection, including statistics and other information required, and set up an action plan for ML/TF risk assessment accordingly; (See Section 3.3)
- Coordinate the Asset Freezing Coordination Commission (hereafter as “the Commission”) as the Secretariat in order to discuss the practical operational procedures of asset freezing and emergency notification mechanism, and held seminars on “Asset Freezing Regime” to different industries; (See Section 3.4) and
- Coordinate training activities for different government agencies and judicial authorities.

3.1.2 Strategic Analysis

GIF has been coordinating relevant Interdepartmental AML/CFT Working Group members to carry out thematic risk assessments in various areas since 2009. Results and findings from those risk assessments have been shared among relevant government agencies and judicial authorities, meetings were also arranged to explain the risks identified and suggest risk mitigation measures. These ongoing risk assessment project studies include:

- (a) Non-profit organization sector review based on international standard requirements;
- (b) ML/TF risks based on STRs received in relation to the gaming sector;
- (c) Analytical review on the enhanced customer due diligence data received from supervisory agency;
- (d) Thematic review based on particular typologies from STRs;
- (e) Review on risks of the cross-border cash declaration system.

These study reports cover the results from STR analysis as well as international AML/CFT developments. Whenever emerging trends or threats were detected, *GIF* will share the information with Interdepartmental AML/CFT Working Group members for follow-up actions, and discuss how to develop the relevant risk mitigation measures. These study reports served as useful reference for different government agencies and judicial authorities in preparing their AML/CFT work plan and polices, which include prioritizing their work according to the risks identified, allocating more resources in higher risk areas, amending the operational

The 1st Interdepartmental AML/CFT Working Group Meeting in 2020



procedures and supervisory guidelines to incorporate risk mitigation measures. Most of the recommendations have been adopted by the respective agencies, with timely follow-up, as so to comply with the requirements of international organizations and reduce the risk of ML/TF involved in different industries.



The 2nd Interdepartmental AML/CFT Working Group Meeting in 2020

3.2 The AML/CFT/CPF Strategic Plan (2021–2025) of the Macao SAR

The 1st round of AML/CFT/CPF risk assessment for the Macao SAR was completed in 2015, based on the findings and results of the assessment, the 1st AML/CFT/CPF strategic plan was developed to follow up the related work. The 1st strategic plan was endorsed in 2016 and expired by the end of 2020. Therefore, *GIF*, being the coordinator of the Interdepartmental AML/CFT Working Group, developed and discussed with the members of the Working Group in 2020 the direction and objectives of the AML/CFT/CPF policy of the Macao SAR for the years from 2021 to 2025, in order to respond to the complex changes in the development of international trends of ML/TF/PF and to sustain the growth and diverse development of Macao SAR's economy.

The 2nd AML/CFT/CPF Strategic Plan (2021–2025) of the Macao SAR was formulated on the basis of the 2017 APG Mutual Evaluation (ME) Report, the 2019 Macao Follow-Up Report, and the review of implementation of the 1st Strategic Plan. The main goal is to follow-up on the priority actions hereinafter:

- (a) Establishment of a specific, consolidated operational AML/CFT strategy for all LEAs;
- (b) Establishment of a more comprehensive AML/CFT legal framework;
- (c) Promotion of proactive financial investigation;
- (d) Development of strategic intelligence;
- (e) Continuously increase the level of awareness of reporting entities;
- (f) Enhancement of monitoring of compliance of company registry;
- (g) Implementation of obligations under PF (United Nations Security Council Resolutions (UNSCRs)).

The AML/CFT/CPF Strategic Plan (2021–2025) of the Macao SAR

Anti-Money Laundering/Countering the Financing of Terrorism/Combating the Financing of Proliferation of Weapons of Mass Destruction

Strategic Plan (2021-2025)

Macao Special Administrative Region



In order to effectively implement the above goals, the Interdepartmental AML/CFT Working Group has developed various strategic goals and a series of sub-goals and action items, and has scheduled the implementation time frame into short-term, medium-term, long-term and ongoing, taking into account the priority of the work.

According to the APG's earlier assessment schedule, after the APG mutual assessment in 2017, the Macao SAR should undergo a five-year follow-up assessment after the 3rd round of APG assessment in 2023/2024. However, considering the allocation of resources and overall effectiveness, FATF decided to cancel the five-year follow-up assessment and to commence a new round of ME after completion of the current round. The assessment methodology and the ME schedule of the next round for each jurisdiction are still under discussion. The 2nd AML/CFT/CPF Strategic Plan of the Macao SAR demonstrates high level policy and commitment to address the concerns, that is AML/CFT/CPF issues, of the international community and organizations. Meanwhile, the strategic plan can assist the agencies to implement their work systematically and with proper direction. It also serves as a guide for better planning and preparation for the next (4th) round of APG ME.

3.3 Preparation Work of the Next Round of ML/TF Risk Assessment of the Macao SAR

According to the requirement of Recommendation 1 of FATF, each jurisdiction should not only identify and assess the risk of ML and TF, but also allocate resources and implement risk mitigation measures based on risk, and update the risk assessment regularly to keep it up-to-date. Therefore, following the completion of the 1st and 2nd rounds of ML/TF risk assessment in 2015 and 2019 respectively, the Macao SAR has commenced the preparation work for the new round of risk assessment in 2020.

As always, being the coordinator of the Interdepartmental AML/CFT Working Group, *GIF* is responsible for planning and coordinating the risk assessment project and has been exploring risk assessment tools that can be well-utilized by the Macao SAR. In 2020, while consulting the relevant risk assessment tool providers, *GIF* also made efforts to liaise with neighboring regions to seek their views on the use of such tools, in which a virtual meeting was arranged for the key working group members with counterparts in Mainland China sharing their experience on the use of risk assessment tools.

After a robust procurement process and thorough consideration, the Macao SAR officially engaged the service of the international organization's risk assessment tool in November 2020, and a series of training workshops and remote technical support were scheduled. To kick off the project, a briefing session was held on 16th December with the participation of 16 government departments and judicial authorities, including the *AMCM*, *CCAC*, *CIEPDSS*, *CPSP*, *DICJ*, *DSAJ*, *DSEDT*, *DSF*, *GIF*, *IH*, *IPIM*, *MP*, *PJ*, *SA*, *SPU* and the Court.

Training Workshop on Risk Assessment Tools of International Organization



Members of the Interdepartmental AML/CFT Working Group will use the international organization's risk assessment tools to conduct a comprehensive assessment on their respective industry, including the products/services provided by regulated entities, to identify or assess higher risk areas in order to allocate appropriate resources for supervision. The judicial authorities and LEAs will collect more detailed information for each investigation case according to the risk assessment module, and conduct comprehensive analysis on various criminal tools, fund flows, etc., in order to have a precise understanding and identification of crime threat.

3.4 Coordination of the Asset Freezing Coordination Commission

The Asset Freezing Coordination Commission (hereafter as “the Commission”) was established on 1st September 2016, in accordance with Paragraph 4 of Article 5 of Law no. 6/2016 “Asset Freezing Regime”. Due to the incoming of the 5th-term Government, the composition of the Committee members was renewed in accordance with the Chief Executive Order no. 64/2020 in March 2020, the new members are the *SPU* (Coordinator), *MP*, *SA*, *DSAJ*, *AMCM*, *GIF* (the Secretariat of the Commission) and *PJ*. The Commission is mainly responsible for setting up, maintaining and updating the public database available on its website, for the lists of the designated natural and legal persons and entities, as well as the record of frozen assets, communicating to the entities in accordance with the Law, providing guidelines to ensure the entities to implement their obligations and duties, and issuing technical opinions.

The Commission held a meeting in May 2020, which was the first meeting for the new members, to discuss the practical operational procedures of asset freezing and emergency notification mechanism. In 2020, the Commission had issued several notifications to the supervisory agencies on the publication of UNSCR in the official Gazette of the Macao SAR.

The Commission Meeting



In order to ensure the effective implementation of the “Asset Freezing Regime” and to raise the awareness of the industry about the responsibilities and obligations of the relevant laws, the Secretariat of the Commission (*GIF*) incorporated the relevant content of the “Asset Freezing Regime” in the routine AML/CFT trainings provided to the industry. The Commission, through the Secretariat, provided two thematic training sessions in 2020, with the aim of enhancing the industry's understanding of the effective implementation of “Asset Freezing Regime” and establishing relevant policies and internal procedures. The two training sessions were attended by around 80 participants, which were from financial institutions, compliance departments of gaming concessionaires/sub-concessionaires and pari-mutuel concessionaires.

The Secretariat of the Commission organized thematic seminar on “Asset Freezing Regime” for financial institutions



The Secretariat of the Commission organized thematic seminar on “Asset Freezing Regime” for gaming sector

3.5 Participation of International Bodies Activities

ML and TF crimes never confine themselves to the border of a jurisdiction and always involve international movements of funds. As such, different international organizations foster cooperation and compliance globally with the internationally recognized standards in AML/CFT, in particular the 40 Recommendations of FATF. Macao SAR joined the APG in 2001 and *GIF* joined the Egmont Group in 2009. As a member, Macao SAR has been proactively enhancing its AML/CFT efforts through the participation in the meetings as well as the assessment missions of member jurisdictions. These commitments not only fulfill the obligations of the Macao SAR being a member of the international organization, but also enhance the international status of the Macao SAR.

3.5.1 Chairing of APG ME Committee

Since September 2013, the Legal Counsel of *GIF* was appointed as one of the Co-Chairs of the APG ME Working Group (MEWG). The core function of the MEWG is to support implementation of the 3rd round ME under the new assessment methodology and to communicate any outcome with the APG Secretariat. The MEWG discusses the ME Report, prior to their discussion and approval in Plenary, makes recommendations to members concerning some key issues related to each ME Report and Follow-Up Report. The MEWG is also responsible to manage the program of training and allocation of assessors for the 3rd round ME, contribute to the development and implementation of procedures and mechanisms to help ensure quality and consistency in ME, including handling follow-up procedures. In August 2019, the Legal Counsel of *GIF* had successfully sought the election as Co-Chair of the ME Committee (MEC) (MEWG was changed to MEC in 2017) during the APG Annual Meeting for a 3-year term until 2022. During 2020, a total of 6 virtual meetings were held for the MEC.

3.5.2 Participation in ME of other APG Member Jurisdictions

Being a member of APG, Macao SAR is obliged to nominate appropriate experts to assist APG in the ME assessment. In the past few years, members of the Interdepartmental AML/CFT Working Group have proactively participated in the assessor training workshops organized by APG and committed themselves to take up assessment work for other APG member jurisdictions, in order to fulfill its duties as a member of an international organization.

In 2020, the Director of *GIF*, 1 representative from *GIF* and 1 representative from the Interdepartmental AML/CFT Working Group have taken up the assessor role in the APG ME of 3 member jurisdictions. In addition, with the invitation from FATF, the Legal Counsel of *GIF* has also taken up the assessor role for the ME of FATF member. Aside from that, another 2 representatives have committed to take up the missions as FATF/APG reviewers according to their own areas of expertise.

3.5.3 Chairing Asia/Pacific Joint Group of International Cooperation Review Group of FATF

Since May 2020, the Director of *GIF*, representing Macao SAR, was appointed as one of the Co-Chairs of the Asia/Pacific Joint Group (APJG), a regional sub-group of the International Cooperation Review Group (ICRG) which is responsible for establishing sanction and monitoring lists under FATF. The APJG, with two Co-Chairs and other regional members, is responsible to assess the progress of listed regional members, and the Co-Chairs have to follow up the progress of each listed member and report regularly to the ICRG Co-Chairs, who in turn report to the FATF members.

The Director of *GIF*, as Co-Chair of the APJG, needs to hold 3 face-to-face meetings with the joint group every year to follow up the progress of the members listed in the monitoring list. Due to the impact of COVID-19 pandemic, these face-to-face meetings have been held virtually. The Director of *GIF*, serving as the Co-Chair of the APJG, has participated or chaired over nearly 20 virtual meetings until the end of 2020, including follow-up meetings with the 3 listed jurisdictions, discussion meetings with ICRG sub-group members and FATF plenary meetings, etc.

As always, the Macao SAR will continue to nominate representatives to participate in international AML organization affairs and actively participate in international work on combating ML and TF.

The Director of *GIF* presided over the virtual regional meetings of international AML organization as the "Asia/Pacific Joint Group" Co-Chair



3.6 International Cooperation

Nowadays, technology evolves rapidly with all aspects in life becoming digitalized. With this trend, technological innovations can always bring significant benefits to daily life and economic growth, but at the same time, it may also be exploited by criminals as new tools or methods to commit new types of crimes. For instance, under COVID-19 pandemic in 2020, internet scams were even more rampant of which criminals used internet to quickly transfer the criminal proceeds. *GIF* understands that international cooperation is the key to success in the prevention and suppression of ML and TF. Therefore, *GIF* has been actively seeking opportunities to establish cooperation and financial intelligence exchange channels to foster cooperation with overseas Financial Intelligence Units (FIUs).

Up to 2020, there were 28 foreign jurisdictions established an information exchange mechanism under the format of Memoranda of Understanding with *GIF*.

The following table indicates the statistics on information exchange between *GIF* and foreign counterparts during 2020:

Table 3: Statistical Data of Information Exchange

2020	Number
Incoming Requests for Information	32
Outgoing Requests for Information	62
Intelligence Received	12
Intelligence Sent	11

Apart from intelligence exchanges with foreign counterparts, *GIF* also seeks opportunities to strengthen other forms of cooperation in AML/CFT with neighboring regions.

3.6.1 “AML/CFT Tripartite Meeting between Mainland China, Hong Kong SAR and Macao SAR”

In order to effectively implement the requirements of the "Greater Bay Guangdong-Hong Kong-Macao Development Planning Guidelines" regarding the improvement of the cross-border mechanism for exchanging information on combating money laundering and terrorist financing, *GIF* periodically meets with the FIUs of Mainland China and Hong Kong SAR, namely the China Anti-Money Laundering Monitoring and Analysis Center (CAMLMAC) of the People's Bank of China (PBOC) and the Hong Kong Joint Financial Intelligence Unit (HKJFIU). To further strengthen the cross-border exchange and cooperation between FIUs of Mainland China, Hong Kong SAR and Macao SAR in the fight against money laundering, the Director and other representatives of *GIF* participated the AML/CFT Tripartite Meeting on 23th December 2020 in Zhuhai, China and meet with representative from CAMLMAC, while representatives from HKJFIU joined the meeting online. The meeting mainly focused on experience sharing of cross-border suspicious transactions involving Mainland China, Hong Kong SAR and Macao SAR, and the typologies development of relevant criminal threats, exploration of feasible mechanism to enhance cooperation among these 3 FIUs, and also information sharing of cross-border capital flows and Macao AML/CFT policies.

Through this meeting, in addition to deepening the mutual understanding of the 3 FIUs about suspicious transactions involving Mainland China, Hong Kong SAR and Macao SAR, it also helps strengthening the cooperation and communication between these 3 jurisdictions on AML/CFT supervision, so as to enhance the preventive capability of financial institutions in the Greater Bay Area against cross-border money laundering crimes.

“AML/CFT Tripartite Meeting between Mainland China, Hong Kong SAR and Macao SAR”



In-depth discussion between Mainland China, Hong Kong SAR and Macao SAR

3.6.2 PBOC, AMCM and GIF organized the “Guangdong-Macao AML Seminar”

To strengthen the cooperation between Macao SAR and the Greater Bay Area in financial development and the prevention of ML, *AMCM* and *GIF* have frequent communication with PBOC. On 8th January 2020, the “Guangdong-Macao AML Seminar” was held in Zhuhai, China with the representatives of PBOC, *AMCM* and *GIF*. In this seminar, the establishment of different cooperation mechanisms had been discussed, including risk management of cross-border innovative financial products or services, information sharing on AML supervisory issues and cases, as well as cross-border risk monitoring mechanism within same financial group.

In second half of the year, due to COVID-19 pandemic, an online experience sharing session had been held on 5th November 2020, participated by the Deputy Director and other representatives of *GIF*, Banking Supervision Department and Internal Audit Department of *AMCM*, as well as representatives from PBOC including AML Bureau of PBOC, Financial Services Division and AML Division of PBOC Shanghai. The meeting mainly focused on the sharing of experience on AML/CFT issues in relation to Macao SAR’s preparation for APG ME and the practical implementation in response to the latest revision of FATF recommendations. *GIF* will continue to collaborate closely with PBOC, in order to maintain stable financial system development and financial security.

“Guangdong-Macao AML Seminar” in Zhuhai, China





Online AML experience sharing session held by PBOC, AMCM and GIF

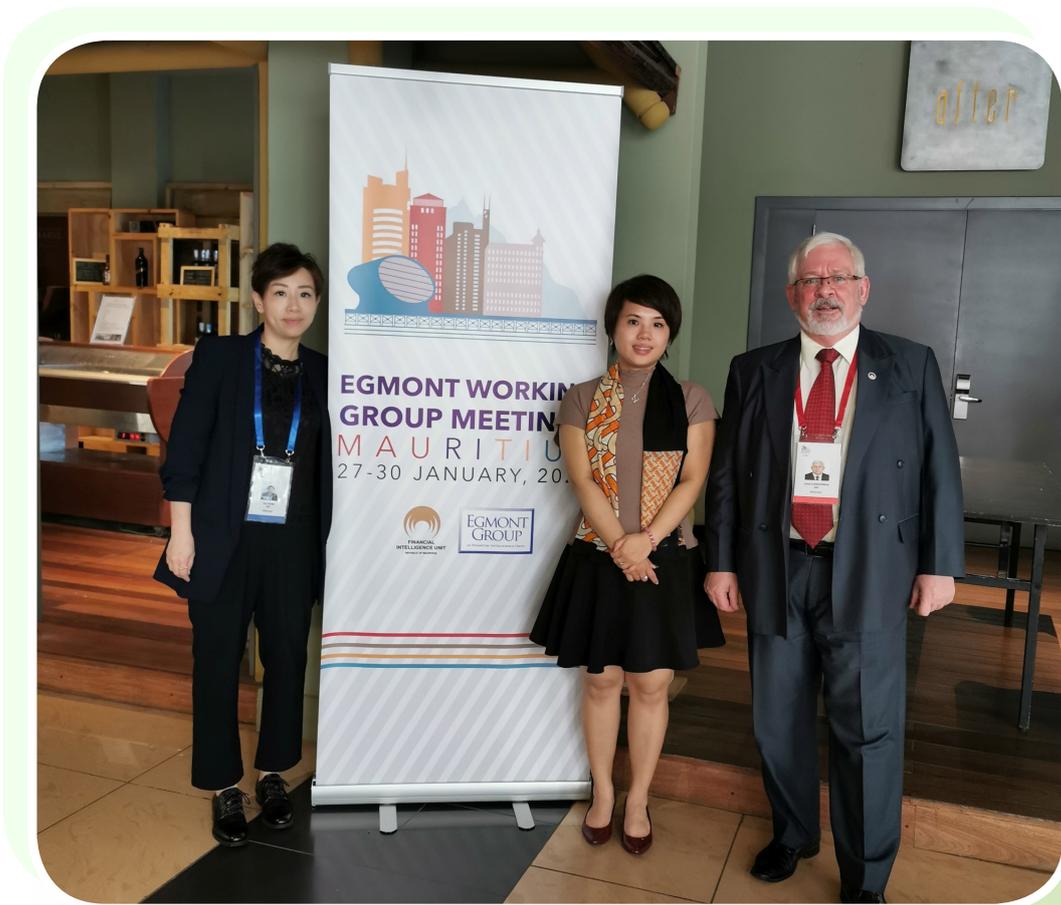
3.7 Attending International Conferences

As a responsible member of international organization, *GIF* proactively participated in international conferences and the assessment missions of member jurisdictions. The international conferences participated in 2020 are as follows:

Table 4: List of International Conferences

Quarters	Conferences	Venues
1 st Quarter	Egmont Group Working Group Meetings 2020	Port Louis, Mauritius
2 nd Quarter	ICRG Meeting	<i>GIF</i> Meeting Room (Virtual meeting)
	Meeting of the APG ad hoc committee on the FATF Strategic Review	
	PF - Updated proposals to amend Recommendation 1	
	Virtual Meeting with private sector experts on CPF	
	Egmont Group Meeting	
3 rd Quarter	FATF Plenary Meeting	<i>GIF</i> Meeting Room (Virtual meeting)
	AML/CFT Working Group Meeting	
	ICRG Meeting	

Quarters	Conferences	Venues
4 th Quarter	ICRG Meeting	G/F Meeting Room (Virtual meeting)
	Egmont Group Meeting	
	FATF Plenary Meeting	
	“Guangdong-Macao AML Seminar” organized by PBOC, AMCM, and GIF	
	FATF Joint Expert Meeting - Emerging ML/TF Risks	
	Meeting of the APG ad hoc committee on the FATF Strategic review	
	FATF Joint Expert Meeting - Digital Transformation for AML/CFT	
	AML/CFT Tripartite Meeting between Mainland China, Hong Kong SAR and Macao SAR	Zhuhai, China



Egmont Group Working Group Meetings 2020 in Port Louis, Mauritius

ICRG Meeting



FATF Plenary Meeting

ICRG Meeting



Meeting of the APG ad hoc committee on the FATF Strategic review

3.8 Local Cooperation

3.8.1 Cooperation among Government Agencies

Information sharing and collaboration is fundamental to *GIF's* operations. Maintaining effective partnerships with all the relevant government agencies has been a cornerstone of *GIF's* work. Partnerships and collaboration continued to be crucial to the success of cross-agency task forces in the past year to achieve the objective of fighting ML/TF. During 2020, the following meetings were held among legal departments, supervisory agencies and LEAs:

Judicial Authorities and LEAs

- A meeting was held with *MP*, *AMCM*, *DICJ* and *PJ* in March to discuss the revision of "Financial System Act".
- Meetings were held with *PJ* in June and November to discuss the prevention of TF and PF through the banking sector under the existing legal framework.
- A meeting was held with *DICJ* and *PJ* in July to discuss the effectiveness of AML and international cooperation of the gaming sector.
- A meeting with the Court, *MP* and *PJ* was held in October to organize the second meeting of the working group of central coordination mechanism and asset recovery mechanism, to discuss the implementation of the above mechanisms.
- A meeting was held with *SA* in December to discuss the implementation of control of the cross-border transportation of cash and bearer negotiable instruments.

Supervisory Agencies

- Tripartite meetings were held with *AMCM* and *DICJ* in January and September to discuss the trend of suspicious transactions.
- A meeting was held with Asset Freezing Coordination Commission in May to organize the 13th Asset Freezing Coordination Commission Meeting.
- Bilateral meetings were held with *AMCM* in June and December to discuss AML/CFT activities, 3rd round of ML/TF risk assessment, FATF's recommendation on virtual assets, STR typologies and trends, "Trust Law", regional cooperation of AML/CFT in Greater Bay Area, and cooperation in organizing trainings, seminars, promotional activities, etc.
- Bilateral meetings were held with *DICJ* in August and November to discuss the fund flow and risk assessment of ML/TF in the gaming sector of Macao.

- A meeting with *DSAJ*, *DSEDT*, *DSF* and *IH* was held in October to discuss the supervisory procedures of AML/CFT and update the supervision manuals.
- A meeting was held with Macao Postal Savings in November to discuss the implementation of AML/CFT supervisory measures and the relevant international trends.

Other Departments

- A meeting was held with *DSI* in September to discuss the AML/CFT international standard on digital identity.

Interdepartmental Risk Assessment Meeting

- Meetings with AML Working Group were held in June and December to discuss AML/CFT work and the 3rd round Risk Assessment preparation work.

3.8.2 “Joint Meeting on Prevention and Suppression of Financial Crimes”

In respond to the rapid changing financial crime patterns, *GIF* had held four “Joint Meetings on Prevention and Suppression of Financial Crimes” since 2018 in order to strengthen the information exchange and cooperation mechanism with the financial sector. The 5th and 6th joint meetings had been held in June and December 2020 respectively in the meeting room of *GIF* and *IPIM*. Altogether 20 representatives from the compliance department of the banking sector and *GIF* attended the 5th joint meeting, which discussed the latest trends of suspicious transactions in the financial sector and feedback system of STRs. The 6th joint meeting was participated by 55 representatives from *GIF* and financial sector, topics for discussion including the detection of suspicious transactions and implementation of asset freezing regime, user list renewal of online STR reporting system as well as organization of training courses and promotional activities on AML/CFT.

“The 5th Joint Meeting on Prevention and Suppression of Financial Crimes”



“The 6th Joint Meeting on Prevention and Suppression of Financial Crimes”

3.8.3 Communication with Private Sector

In 2020, in order to cope with the pandemic prevention work of Macao SAR government, *GIF* only started to organize meetings with reporting entities from different industries in the second half year, when the pandemic situation in Macao SAR was under control. *GIF* met with reporting entities in order to maintain effective communication and to discuss the statistics, typologies and recent trends of STRs. In addition, *GIF* also enquired about the latest market development of new products and services, so as to consider the ML/TF risks involved and amend the relevant AML/CFT preventive measures when necessary, with the aim to elevate the effectiveness of AML/CFT in Macao SAR.

ChongWa (Macao) Financial Asset Exchange Company Limited visited *GIF*



3.9 Public Awareness Program

GIF continued to raise public awareness on AML/CFT through publications and trainings. Despite the impact of COVID-19 pandemic in 2020, *GIF* still tried to organize series of public awareness programs for different sectors and public, including trainings or online trainings tailored to different stakeholders, the publication of newsletters and annual reports, as well as the website and WeChat Official Account with updates on AML/CFT issues accessible to the public.

GIF will continue to conduct different types of public awareness programs in order to deliver AML/CFT knowledge to the public and other practitioners, for the betterment of economic environment and development for Macao SAR.

3.9.1 Local and International Training for *GIF* Staff and Other Government Agencies

From the 2nd quarter to 4th quarter of 2020, 16 training sessions had been attended by staff of *GIF* and other government agencies and judicial authorities of the Interdepartmental AML/CFT Working Group:

Table 5: List of Local and International Trainings and Seminars

Quarters	Topics of Trainings/Seminars	Organizers
2 nd Quarter	Risk Assessment Training on AML/CFT (Mainly focus on Investigation, Prosecution and Confiscation)	PBOC, <i>GIF</i>
	FATF Supervisors' Forum - Challenges in supervision of Designated Non-Financial Businesses and Professions (DNFBPs) and Strategies for establishing risk-based supervision of DNFBPs	FATF
3 rd Quarter	The role of the FIUs in national ML/TF risk assessments: lessons learned	Egmont Group
	Egmont Centre of FIU Excellence & Leadership (ECOFEL) Virtual Training Sessions: - Clarify the role of FIUs in National Risk Assessments and provide important information on successes, failures and lessons learned	
	HoFIU Webinars: 1. Introduction to virtual assets and virtual asset service providers 2. Operational aspects associated with virtual assets	
	ECOFEL Virtual Training Sessions: - Help FIUs to build knowledge and acquire a better understanding of the risks and challenges posed by COVID-19	
	HoFIU Webinars: 1. Domestic and international cooperation on ML/TF cases through virtual assets and virtual asset service providers 2. Vulnerabilities of mobile payment services to ML/TF	
	ECOFEL Virtual Training Sessions: - This co-delivered training session by FATF and ECOFEL help FIUs to better understand, identify and investigate financial flows related to Illegal Wildlife Trade	
	Illegal Wildlife Trade	

Quarters	Topics of Trainings/Seminars	Organizers
3 rd Quarter	Experience Sharing Session on Combating ML	<i>MP, PJ, GIF</i>
	Combating Financial Frauds through Effective Money Interception Mechanisms	The International Criminal Police Organization
	FATF Webinars on the impact of COVID-19 pandemic on ML/TF risks	FATF
	Experience Sharing Session on Combating ML	<i>PJ</i>
	Internal training for financial intelligence analysis	<i>GIF</i>
	Seminar on Integrity	<i>CCAC</i>
4 th Quarter	Experience Sharing Session on Combating ML	<i>PJ, GIF</i>

Risk assessment training on AML/CFT by PBOC



FATF Supervisors' Forum - Challenges in supervision of DNFBPs and Strategies for establishing risk-based supervision of DNFBPs



GIF was invited by PJ to share experiences on AML



金融情報辦公室
Gabinete de Informação Financeira



GIF invited AML specialist to conduct training on financial intelligence analysis

CCAC provided "Seminar on Integrity" for GIF



Experience sharing session on AML by PJ and GIF

3.9.2 Training for Government Departments and Private Sector

Raising the awareness of supervisory departments and reporting entities on their AML/CFT obligations is always crucial to the functions of *GIF*. During 2020, the following training sessions had been conducted not only for the staff of government departments, but also the front line staff, compliance departments and management of different industries. Details are as follows:

Table 6: List of Trainings and Seminars Organized by *GIF*

Sectoral training – Total number of participants: 300

Industries	Training Target
Banking Industry	Financial Institutions
Gaming Industry	Compliance Officers of Gaming Concessionaires
Real Estate Industry	Real Estate Agents
Professional Association	Members of Macau Anti-Money Laundering Specialists Association

GIF provided AML/CFT Seminar for Financial Sector



The 2nd seminar of “Tools and Techniques for Enhancement on AML/Anti-Financial Crime”

Government officials training – Total number of participants: 50

Industries	Training Target
Government Agencies	DICJ

Individual training – Total number of participants: 600

Industries	Training Target
Financial Institutions	Staff of <i>Banco Comercial de Macau, S.A.</i>
	Staff of Bank of Communications Company Limited, Macao Branch
	Management and compliance departments of Bank of China Limited, Macao Branch
	Staff of Tai Fung Bank Limited
	Staff of Macao Development Bank Limited
	Staff of ChongWa (Macao) Financial Asset Exchange Company Limited
	Staff of China Taiping Life Insurance (Macao) Company Limited
Educational institutions	Bachelor Students of Macau Institute of Management

GIF provided AML/CFT training to *Banco Comercial de Macau, S.A.*



GIF provided AML/CFT training to Bank of Communications Company Limited, Macao Branch



GIF provided AML/CFT training to Bank of China Limited, Macao Branch

GIF provided AML/CFT training to Tai Fung Bank Limited



GIF provided AML/CFT training to Macao Development Bank Limited

GIF provided AML/CFT training to ChongWa (Macao) Financial Asset Exchange Company Limited



GIF provided AML/CFT training to China Taiping Life Insurance (Macao) Company Limited



GIF provided AML/CFT training to Macau Institute of Management

3.10 Courtesy Visit from/to Other Entities

In the second half of 2020, *GIF* continued to receive courtesy visits from different institutions including financial institutions, educational institutions and professional associations. Through these visits, *GIF* introduced the AML/CFT related works conducted by the Macao SAR government, the trends, typologies of STRs and related financial knowledge, as well as discussed relevant supervisory policies and measures so as to enhance the effectiveness of combating ML/TF crimes in various industries.

Macao Anti-Money Laundering Specialists Association visited *GIF*



Tai Fung Bank Limited visited *GIF*



GIF visited Macau Institute of Management

CHAPTER IV ADMINISTRATION

4.1 Means of STR Submission

GIF has launched the Online STR Reporting System (secured website) for 9 years. Through this secured and efficient way to submit STR, paper consumption can be reduced and hence, it is more environmental friendly. The table below shows the utilization rate of the 3 current methods of STRs submission in the past 3 years.

Table 7: Statistical Data for the Methods of STRs Submission

Methods of Submission	Number of STRs					
	2018	%	2019	%	2020	%
Paper Form	407	11.0%	401	13.6%	583	26.2%
Encrypted Email*	29	0.8%	0	0.0%	0	0.0%
Secured Website	3,280	88.2%	2,540	86.4%	1,641	73.8%
Total	3,716	100%	2,941	100%	2,224	100%

*The method of Encrypted Email had been suspended since January 2019.

From the data above, secured website and paper form are the main methods of submission of STRs in 2020. Number of STRs submitted by paper form in 2020 increased significantly was mainly affected by the STR reporting by other institutions. A total of 1,641 STRs were submitted through secured website, which accounted for 73.8% of the total submission rate. This decrease in submission rate was mainly due to the overall decline in business activities as well as STR reporting by the gaming sector under the pandemic. Out of these 1,641 STRs, 1,175 STRs were submitted by the gaming sector, while 466 STRs were submitted by the financial sector. As the Online STR Reporting System has been widely used in gaming and financial industries, it is expected that the submission of STRs through secured website will continue to grow in the future.

4.2 Enhancement in Information Security and Management

During 2020, *GIF* continued to enhance the analytical functions of STR reporting system and improve the multi-functional risk assessment model. By continuous data input and feedbacks to modify the assessment deviation, with the use of risk based approach, the analytical functions had been able to enhance the efficiency of analyzing STRs and the accuracy to identify the trends of STRs.

In complying with the E-Government policy development, daily operations had been optimized by introducing automated system that can handle and process tedious and repetitive workload in batch. The system can standardize the workflows, improve the work quality and allow human resources to handle more complicated analysis. IT team had developed an automated online research application in the second half of 2020 and planned to be launched in the 1st quarter of 2021. The scope of this system will be extended in the future so as to optimize the work flow of *GIF*.

GIF always stays alert to the importance of data security, as such a new system had been introduced to further enhance data protection. This system can better standardize the usage of different documents and data in a secure environment. It also categorizes and maintains the data in a more detailed format to improve effectiveness and data protection. The system had been installed in mid-2020 and partially used by some users in the office during the initial stage. The system is expected to be used by all staff of *GIF* in 1st quarter of 2021. The second stage of the system testing had been finished and these new functions would be extended to the analytical system in the second half of 2021.

As the “Cybersecurity Law” become effective, *GIF* had focused on cyber security construction, optimized the cyber security managing system, established and revised the relevant guidelines and raised the awareness of staff with cyber security requirements in order to implement “Cybersecurity Law” more effectively. In addition, *GIF* had strengthened the network and system including modifying network structure and introduced logbook managing system, enhanced cyber security management, carried out relevant risk assessment to further enhance *GIF*'s cybersecurity.

APPENDIX – GLOSSARY

AMCM	Monetary Authority of Macao (<i>Autoridade Monetária de Macau</i>)
AML	Anti-Money Laundering
APG	Asia/Pacific Group on Money Laundering
APJG	Asia/Pacific Joint Group
ATM	Automated Teller Machine
CCAC	Commission Against Corruption (<i>Comissariado contra a Corrupção</i>)
CAMLMAC	China Anti-Money Laundering Monitoring and Analysis Center
CDM	Cash Deposit Machine
CFT	Combating Terrorist Financing
CIEPDSS	Independent Committee for the Exercise of Disciplinary Power over Solicitors (<i>Comissão Independente para o Exercício do Poder Disciplinar sobre os Solicitadores</i>)
CPF	Countering Proliferation Financing
CPSP	Public Security Force (<i>Corpo de Polícia de Segurança Pública</i>)
DICJ	Gaming Inspection and Coordination Bureau (<i>Direcção de Inspecção e Coordenação de Jogos</i>)
DNFBPs	Designated Non-financial Businesses and Professions
DSAJ	Legal Affairs Bureau (<i>Direcção dos Serviços de Assuntos de Justiça</i>)
DSEDT	Economic and Technological Development Bureau (<i>Direcção dos Serviços de Economia e Desenvolvimento Tecnológico</i>)
DSF	Financial Services Bureau (<i>Direcção dos Serviços de Finanças</i>)
ECOFEL	Egmont Centre of FIU Excellence & Leadership
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit

APPENDIX – GLOSSARY

<i>GIF</i>	Financial Intelligence Office (<i>Gabinete de Informação Financeira</i>)
HKJFIU	Hong Kong Joint Financial Intelligence Unit
ICRG	International Cooperation Review Group
<i>IH</i>	Housing Bureau (<i>Instituto de Habitação</i>)
<i>IPIM</i>	Macao Trade and Investment Promotion Institute (<i>Instituto de Promoção do Comércio e do Investimento de Macau</i>)
IT	Information Technology
LEAs	Law Enforcement Agencies
Macao SAR	Macao Special Administrative Region
ME	Mutual Evaluation
MEC	Mutual Evaluation Committee
MEWG	Mutual Evaluation Working Group
ML	Money Laundering
<i>MP</i>	Public Prosecutions Office (<i>Ministério Público</i>)
PBOC	People's Bank of China
PF	Proliferation Financing
<i>PJ</i>	Judiciary Police (<i>Polícia Judiciária</i>)
SA	Macao Customs Services (<i>Serviços de Alfândega</i>)
<i>SPU</i>	Unitary Police Services (<i>Serviços de Polícia Unitários</i>)
STR	Suspicious Transaction Report
TF	Terrorist Financing
UNSCR	United Nations Security Council Resolution



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