

B. Recommendation 9

Question 4. If the above-mentioned Recommendations have been applied to the conduct of financial activities as a commercial undertaking by other businesses or professions which are not financial institutions, please give a brief description.

Question 5. If yes to question 1, but the above-mentioned Recommendations have not been applied to the conduct of such financial activities please specify the reasons for not applying Recommendations 10 to 21 and 23 to non-financial institutions.

| Country | Brief description of application of the relevant Recommendations to NFI | Reasons for not applying Recommendations 10 to 21 and 23 to non-financial institutions. |
|-----------------|--|---|
| Australia | Casinos, bookmakers, solicitors and accountants (1) | na |
| Austria | Casinos must identify client, otherwise no measures in place | Not considered necessary due to limited ml involvement |
| Belgium | Draft law to cover notaries, bailiffs, internal and external accountants, real estate agents, fund conveyers and casinos (2) | na |
| Canada | No measures in place | Subject to review |
| Denmark | If financial activities (Annex to the ML Act) is main activity of NFIs, covered by anti-money laundering law | Subject to review by Committee |
| Finland | Casinos, real estate and betting agents, pawn shops and insurance brokers, etc. | |
| France | No measures in place | All NFI exercising financial activities are s.t. regulation |
| Germany | Businessmen, persons administering another person's assets against payment, gambling casinos, auctioneers and dealers in precious metals | All NFI exercising financial activities are s.t. regulation |
| Greece | na | |
| Hong Kong | No measures in place | |
| Iceland | No measures in place | Proposal to cover activities |
| Ireland | Measures under consideration for lawyers, accountants and estate agents (no casinos exist) | Designation of lawyers and accountants under active consideration |
| Italy | No measures in place | NFI cannot engage in this activity |
| Japan | No measures in place | |
| Luxembourg | No measures in place | |
| Netherlands | Casinos by law; lawyers, notaries, accountants and auditors have self-regulatory measures | |
| Neths. Antilles | Any person providing financial services by virtue of his profession or in business | |
| Aruba | No measures in place | |
| New Zealand | Anti-ML law applies to financial activities, even carried out by NFIs | |

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 Erindi nr. P
 Alþingi
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| Country | Brief description of application of the relevant Recommendations to NFI | Reasons for not applying Recommendations 10 to 21 and 23 to non-financial institutions. |
|-------------|--|---|
| Norway | na | |
| Portugal | na | |
| Singapore | All persons/entities covered | |
| Spain | Special measures for casinos, real estate, trading in jewels, precious stones and metals, trading activities in art works, antiques, stamps and coins investment | |
| Sweden | No measures in place | Cost of regulating outweighs benefits and there are confidentiality considerations |
| Switzerland | Bill for casinos including provision dealing with money laundering issues, is pending in Parliament | |
| Turkey | na | Recc. 23 n/a in UK for financial institutions either |
| U.K. | Lawyers and accountants. All citizens have a legal duty to report | |
| U.S.A. | Reporting of large cash transactions applies to any person | Working towards self-regulation with accountants |

(1) Australia - see footnote (1) page.5.

(2) Belgium - see footnote (2) page 5.