Guidelines on Prevention of
Money Laundering & Terrorist Financing

Compiled by Mr. Kazi Zillur Rahman, Senior Vice President,
Anti-Money Laundering Department under the guidance
of Mr. Muhammad Yasin Ali, Deputy Managing Director & CAMLCO
## Index

<table>
<thead>
<tr>
<th>No. of Chapter</th>
<th>Name of Chapter</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>1.2</td>
<td>What is Money Laundering</td>
<td>1</td>
</tr>
<tr>
<td>1.3</td>
<td>Stages of Money Laundering</td>
<td>2</td>
</tr>
<tr>
<td>1.4</td>
<td>Why Money laundering is Done</td>
<td>4</td>
</tr>
<tr>
<td>1.5</td>
<td>Why We Must Combat Money Laundering</td>
<td>4</td>
</tr>
<tr>
<td>1.6</td>
<td>What is Terrorist Financing</td>
<td>5</td>
</tr>
<tr>
<td>1.7</td>
<td>Why We Must Combat Financing of Terrorism</td>
<td>6</td>
</tr>
<tr>
<td>1.8</td>
<td>The Link between Money Laundering &amp; Terrorist Financing</td>
<td>6</td>
</tr>
<tr>
<td>1.9</td>
<td>How Prime Bank Limited Can Help in Combating Money Laundering</td>
<td>7</td>
</tr>
<tr>
<td>2.1</td>
<td>Definition of Money Laundering</td>
<td>8</td>
</tr>
<tr>
<td>2.2</td>
<td>Predicate Offence</td>
<td>8</td>
</tr>
<tr>
<td>2.3</td>
<td>Property means</td>
<td>9</td>
</tr>
<tr>
<td>2.4</td>
<td>Reporting organization</td>
<td>9</td>
</tr>
<tr>
<td>2.5</td>
<td>Suspicious or Unusual Transaction</td>
<td>10</td>
</tr>
<tr>
<td>2.6</td>
<td>The Offence of Money Laundering</td>
<td>10</td>
</tr>
<tr>
<td>2.7</td>
<td>Penalties for Money Laundering Offences</td>
<td>11</td>
</tr>
<tr>
<td>2.8</td>
<td>Responsibility of Reporting Organizations in Preventing Money Laundering</td>
<td>12</td>
</tr>
<tr>
<td>2.9</td>
<td>Protection against Proceedings Undertaken in Good Faith</td>
<td>13</td>
</tr>
<tr>
<td>2.10</td>
<td>Compliance Requirements under Anti-Terrorism (Amended) Act, 2012</td>
<td>13</td>
</tr>
<tr>
<td>2.11</td>
<td>Penalties under Anti-Terrorism (Amended) Act, 2012</td>
<td>13</td>
</tr>
<tr>
<td>2.12</td>
<td>Supervisory Power of Bangladesh Bank</td>
<td>14</td>
</tr>
<tr>
<td>3.1</td>
<td>Broad Policy for Prevention of ML &amp; TF</td>
<td>16</td>
</tr>
<tr>
<td>3.2.1</td>
<td>Organization Chart for Implementing AML/CFT Policy</td>
<td>17</td>
</tr>
<tr>
<td>3.2.2</td>
<td>Job Description and Responsibilities</td>
<td>19</td>
</tr>
<tr>
<td>3.3.1</td>
<td>General Procedure for Customer Due Diligence (CDD) or Know Your Customer (KYC)</td>
<td>22</td>
</tr>
<tr>
<td>3.3.2</td>
<td>Customer Acceptance Policy</td>
<td>23</td>
</tr>
<tr>
<td>3.3.3</td>
<td>Customer Identification</td>
<td>25</td>
</tr>
<tr>
<td>3.4.1</td>
<td>Know Your Customer Procedures</td>
<td>34</td>
</tr>
<tr>
<td>3.4.2</td>
<td>Risk Management</td>
<td>35</td>
</tr>
<tr>
<td>3.4.3</td>
<td>Transaction Monitoring Process</td>
<td>36</td>
</tr>
<tr>
<td>3.5</td>
<td>Detection and Reporting of Suspicious Transactions</td>
<td>37</td>
</tr>
<tr>
<td>No. of Chapter</td>
<td>Name of Chapter</td>
<td>Page No.</td>
</tr>
<tr>
<td>---------------</td>
<td>---------------------------------------------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>3.6</td>
<td>Reporting of Cash Transaction Report (CTR)</td>
<td>41</td>
</tr>
<tr>
<td>3.7</td>
<td>Self-Assessment &amp; Independent Testing Procedure System</td>
<td>41</td>
</tr>
<tr>
<td>3.8</td>
<td>Keeping of Records</td>
<td>42</td>
</tr>
</tbody>
</table>

4. TRADE BASED MONEY LAUNDERING

| 4.1           | Definition & Process                                                             | 45       |
| 4.2           | Response of Prime Bank Limited to Combat Trade Based Money Laundering            | 45       |
| 4.3           | Correspondent Banking                                                            | 45       |
| 4.4           | Branches and subsidiaries situated/located in foreign jurisdiction               | 46       |

5. TRAINING & AWARENESS

| 5.1           | Statutory Requirements                                                           | 47       |
| 5.2           | The Need for Employees Awareness                                                 | 47       |
| 5.3           | Education and Training Programs                                                  | 47       |
| 5.4           | New Employees                                                                    | 48       |
| 5.5           | Tellers/Foreign Exchange Dealers                                                 | 48       |
| 5.6           | Employees of Front Desk                                                           | 48       |
| 5.7           | Branch Managers                                                                  | 49       |
| 5.8           | Branch Anti-Money Laundering Compliance Officer (BAMLCO)                         | 49       |
| 5.9           | Refreshers’ Training                                                             | 49       |

ANNEXURE

Annexure-A : Format of AOF (Personal)
Annexure-B : Format of AOF (Non-Personal)
Annexure-C : Identification of Directors/Signatories
Annexure-D : Explanation to Walk in/Walk off Customers
Annexure-E : Examples of potentially suspicious transaction
Annexure-F : Internal suspicious activity report form

Some Important Circular Issued by Bangladesh bank regarding Anti-money laundering:

- AML Circular No. 02 dated 17.07.2002
- AML Circular No. 15 dated 24.03.2008
- AML Circular No. 19 dated 14.08.2008
- AML Circular No. 24 dated 03.03.2010
1.1 INTRODUCTION

- This Guidelines (Guidelines on Money Laundering & Terrorist Financing) of Prime Bank Limited has been developed keeping in consistency with the “Guidance Notes on Prevention of Money Laundering” & relevant circulars issued by Bangladesh Bank to facilitate implementation of the Money Laundering Prevention Act-2012 & Anti Terrorism (Amended) Act, 2012.
- Since banks are vulnerable to being used by money launderers, Bangladesh Bank (Central Bank of Bangladesh) assesses the adequacy of anti-money laundering procedures adopted by banks and the degree of compliance with such procedures. Being a banking company, Prime Bank Limited is in an obligation to comply with the rules, regulations and guidelines issued by Bangladesh Bank from time to time.
- This Guideline is designed/updated to assist Prime Bank Limited to comply with Bangladesh’s anti-money laundering rules and regulations. Prime Bank Limited intends to use this policy as a criterion to assess the adequacy of its internal control, policies and procedures to counter money laundering and terrorist financing.

1.2 WHAT IS MONEY LAUNDERING

Money laundering can be defined in a number of ways. But the fundamental concept of Money laundering is the process by which proceeds from a criminal activity are disguised to conceal their illicit origins. Most countries subscribe to the definition adopted by the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988) (the Vienna Convention) and the United Nations Convention Against Transnational Organized Crime (2000) (the Palermo Convention):

- The conversion or transfer of property, knowing that such property is derived from any Offence, e.g. drug trafficking, or Offences or from an act of participation in such Offence or Offences, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an Offence or Offences to evade the legal consequences of his actions;

- The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of property, knowing that such property is derived from an Offence or Offences or from an act of participation in such an Offence or Offences, and;

- The acquisition, possession or use of property, knowing at the time of receipt that such property was derived from an Offence or Offences or from an act of participation in such Offence or Offences.
The Financial Action Task Force on Money Laundering (FATF), which is recognized as the international standard setter for anti-money laundering (AML) efforts, defines the term “money laundering” succinctly as “the processing of…criminal proceeds to disguise their illegal origin” in order to “legitimize” the ill-gotten gains of crime.

1.3 STAGES OF MONEY LAUNDERING

There is no single method of laundering money. In most of the criminal cases, the initial proceeds usually take the form of cash. For example, bribery, extortion, robbery and street level trade of drugs are almost always made with cash. This cash needs to enter into the financial system by some means so that it can be converted into a form which can be more easily transformed, concealed or transported.

Despite the variety of methods employed, the laundering is not a single act but a process accomplished in 3(three) basic stages, placement, layering and integration.

**Placement**- the physical disposal of the initial proceeds derived from illegal activity. This is the movement of cash from its source. On occasion the source can be easily disguised or misrepresented. This is followed by placing it into circulation through financial institutions, casinos, shops, exchange houses, security brokers, and other businesses, both local and abroad.

**Layering**- separating illicit proceeds from their source by creating complex layers of financial transactions designed to disguise the audit trail and provide anonymity. The purpose of this stage is to make it more difficult to detect and uncover a laundering activity. It is meant to make the trailing of illegal proceeds difficult for the law enforcement agencies.

**Integration**- the provision of apparent legitimacy to wealth derived criminally. If the layering process has succeeded, integration schemes place the laundered proceeds back into the economy in such a way that they re-enter into the financial system appearing as normal business funds.

These three steps are illustrated in the following page:
The three basic steps may occur as separate and distinct phases. They may also occur simultaneously or more commonly, may overlap. How the basic steps are used depends on the available laundering mechanisms and the requirements of the criminal organizations.

The table below provides some typical examples of the stages of money laundering.

<table>
<thead>
<tr>
<th>Placement Stage</th>
<th>Layering Stage</th>
<th>Integration Stage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash paid into bank (sometimes with employees complicity or mixed with proceeds of legitimate business).</td>
<td>Sale or switch to other forms of investment.</td>
<td>Redemption of contract or switch to other forms of investment.</td>
</tr>
<tr>
<td>Cash exported.</td>
<td>Money transferred to assets of legitimate financial institutions.</td>
<td>False loan repayments or forged invoices used as cover for laundered money.</td>
</tr>
<tr>
<td>Cash used to buy high value goods, property or business assets.</td>
<td>Telegraphic transfers (often using fictitious names or funds disguised as proceeds of legitimate business).</td>
<td>Complex web of transfers (both domestic and international) makes tracing original source of funds virtually impossible.</td>
</tr>
<tr>
<td>Cash purchase of single premium life insurance or other investment.</td>
<td>Cash deposited in outstation branches and even oversees banking system.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Resale of goods/assets.</td>
<td></td>
</tr>
</tbody>
</table>
1.4 WHY MONEY LAUNDERING IS DONE

First, money represents the lifeblood of the organization/person that engages in criminal conduct for financial gain because it covers operating expenses and pays for an extravagant lifestyle. To spend money in these ways, criminals must make the money they derived illegally appear legitimate.

Second, a trail of money from an offense to criminals can become incriminating evidence. Criminals must obscure or hide the source of their wealth or alternatively disguise ownership or control to ensure that illicit proceeds are not used to prosecute them.

Third, the proceeds from crime often become the target of investigation and seizure. To shield ill-gotten gains from suspicion and protect them from seizure, criminals must conceal their existence or, alternatively, make them look legitimate.

1.5 WHY WE MUST COMBAT MONEY LAUNDERING

1. Money Laundering has devastating economic, security and social consequences. It provides the fuel for drug dealers, smugglers, terrorists, illegal arms dealers, corrupt public officials and others to operate and expand their criminal enterprises. This drives up the cost of government for increased law enforcement and health care expenditures (for example, for treatment of drug addicts).

2. Money Laundering diminishes government tax revenue. It also makes government tax collection more difficult. This results in higher tax rates.

3. Money laundering distorts asset and commodity prices and leads to misallocation of resources. It can lead to an unstable liability base and to unsound asset structures thereby creating risks of monetary instability for banks.

4. One of the most serious microeconomic effects of money laundering is felt in the private sector. Money launderers often use front companies, for co-mingling their illicit proceeds with legitimate funds, to hide the ill-gotten gains. Because of substantial illicit funds, these front companies can subsidize their products and services at levels well below market rates. This makes it difficult for legitimate businesses to compete against front companies. This situation can result in the crowding out of legitimate private sector businesses by criminal organizations.

5. Among its other negative socioeconomic effects, money laundering transfers economic power from the market, government and citizens to criminals.

6. The social and political costs of laundered money are also serious as laundered money may be used to corrupt national institutions. Bribing of officials and governments undermines the moral fabric in society, weakens collective ethical standards and corrupts our democratic institutions.

7. Nations cannot afford to have their reputation and banks cannot have their image tarnished by an association with money laundering, especially in today’s global economy.
8. Money laundering weakens confidence in and reputation of a bank. A bank tainted by money laundering accusations from regulators law enforcement agencies or the press risks the loss of its good market reputation as well as reputation of the country.

1.6 WHAT IS TERRORIST FINANCING

Terrorist financing can be simply defined as financial support, in any form, of terrorism or of those who encourage, plan, or engage in terrorism. The International Convention for the Suppression of the Financing of Terrorism (1999) under the United Nations defines TF in the following manner:

1) 'If any person commits an offense by any means, directly or indirectly, unlawfully and willingly, provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out:
   a. An act which constitutes an offence within the scope of and as defined in one of the treaties listed in the link given below; or
   b. Any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking any active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing an act.

2) For an act to constitute an offense set forth in the preceding paragraph 1, it shall not be necessary that the funds were actually used to carry out an offense referred to in said paragraph 1, subparagraph (a) or (b).

According to the article 7 of the Anti Terrorism (Amendment) Act, 2012 of Bangladesh, financing of terrorism means:

Offences relating to financing terrorist activities.— (1) If any person or entity knowingly provides or expresses the intention to provide money, services, material support or any other property to another person or entity and where there are reasonable grounds to believe that the same have been used or may be used in full or partially for any purpose by a terrorist person, entity or group or organization, he or the said entity shall be deemed to have committed the offence of financing terrorist activities.

(2) If any person or entity knowingly receives money, services, material support or any other property from another person or entity and where there are reasonable grounds to believe that the same have been used or may be used in full or partially for any purpose by a terrorist person or entity or group or organization, he or the said entity shall be deemed to have committed the offence of financing terrorist activities.

(3) If any person or entity knowingly makes arrangement for money, services, material support or any other property for another person or entity where there are reasonable grounds to believe that the same have been used or may be used in full or partially for any purpose by a terrorist person or entity or group or organization, he or the said entity shall be deemed to have committed the offence of financing terrorist activities.
(4) If any person or entity knowingly instigates another person or entity to provide or receive or make arrangement for money, services, material support or any other property in such a manner where there are reasonable grounds to believe that the same have been used or may be used in full or partially by a terrorist person or entity or group or organization for any purpose, he or the said entity shall be deemed to have committed the offence of financing terrorist activities.

1.7 WHY WE MUST COMBAT FINANCING OF TERRORISM

- Financing of Terrorism was criminalized under United Nations International Convention for the Suppression of the Financing of Terrorism in 1999. To reinforce the 1999 convention, United Nations adopted UNSC Resolutions 1373 and 1390 directing member states to criminalize Financing of Terrorism and adopt regulatory regimes to detect, deter and freeze terrorists’ assets. The resolutions oblige all states to deny financing, support and safe harbour for terrorists.
- Bangladesh has actively involved in multinational and international institutions. Its international relationship and business, banking business in particular are regulated by some domestic and international regulations. So it is mandatory to abide by those regulations. Financial Action Task Force (FATF), the international standard setter, adopted Special Eight Recommendations on Terrorist Financing. So we must be involved in international effort to combat Financing of Terrorism.
- It is increasingly evident that terrorists and their organizations need to raise significant amounts of cash for a wide variety of purposes for recruitment, training, travel and materials as well as often payment for safe heaven protection. So to root up terrorism, we must stop the flow of funds that keep them in business.
- The consequences of allowing the financial system to facilitate the movement of terrorist money are so horrendous that every effort must be made to prevent this from happening. So combating money laundering and financing of terrorism are not only the regulatory requirement but also an act of self interest.

1.8 THE LINK BETWEEN MONEY LAUNDERING AND TERRORIST FINANCING

The techniques used to launder money are essentially the same as those used to conceal the sources of, and uses for, terrorist financing. But funds used to support terrorism may originate from legitimate sources, criminal activities, or both. Nonetheless, disguising the source of terrorist financing, regardless of whether the source is of legitimate or illicit origin, is important. If the source can be concealed, it remains available for future terrorist financing activities. Similarly, it is important for terrorists to conceal the use of the funds so that the financing activity goes undetected.
As noted above, a significant difference between money laundering and terrorist financing is that the funds involved may originate from legitimate sources as well as criminal activities. Such legitimate sources may include donations or gifts of cash or other assets to organizations, such as foundations or charities that, in turn, are utilized to support terrorist activities or terrorist organizations.

1.9 HOW PRIME BANK LIMITED CAN HELP IN COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

1. One of the best methods of preventing and combating money laundering and terrorist financing is a sound knowledge of a customer’s business and pattern of financial transactions and commitments. In this principle, Prime Bank Limited has already adopted sound “Know Your Customer” procedure to record full and correct information of the customers so as to avoid inadvertent involvement in money laundering and terrorist financing.

2. Thus the Bank’s effort to combat money laundering and terrorist financing largely focuses on the process where the launderer’s activities are more susceptible to recognition and therefore concentrates to a large extent on the deposit taking procedures i.e., the placement stage.

3. Branches must keep transaction records that are comprehensive enough to establish an audit trail. Such records can also provide useful information of the people and organizations involved in laundering schemes.

4. Anti-Money Laundering Department & Training Institute of the Bank also deal with employees training programs which are designed to make awareness about money laundering techniques and tools etc so as to combat money laundering and terrorist financing.
2.1 DEFINITION OF MONEY LAUNDERING

Money Laundering is defined in Section 2 (v) of the Money Laundering Prevention Act 2012 as follows:

—money laundering means –
(i) knowingly moving, converting, or transferring proceeds of crime or property involved in an offence for the following purposes:-
   1. concealing or disguising the illicit nature, source, location, ownership or control of the proceeds of crime; or
   2. assisting any person involved in the commission of the predicate offence to evade the legal consequences of such offence;
(ii) smuggling money or property earned through legal or illegal means to a foreign country;
(iii) knowingly transferring or remitting the proceeds of crime to a foreign country or remitting or bringing them into Bangladesh from a foreign country with the intention of hiding or disguising its illegal source; or
(iv) concluding or attempting to conclude financial transactions in such a manner so as to reporting requirement under this Act may be avoided;
(v) converting or moving or transferring property with the intention to instigate or assist for committing a predicate offence;
(vi) acquiring, possessing or using any property, knowing that such property is the proceeds of a predicate offence;
(vii) performing such activities so as to the illegal source of the proceeds of crime may be concealed or disguised;
(viii) participating in, associating with, conspiring, attempting, abetting, instigate or counsel to commit any offences mentioned above;

2.2 PREDICATE OFFENCE

The offences from which the proceeds derived from committing or attempt to commit the following offences:

1. Corruption and bribery;
2. Counterfeiting currency;
3. Counterfeiting documents;
4. Extortion;
5. Fraud;
6. Forgery;
7. Illicit arms trafficking;
8. Illicit dealing in narcotic drugs and psychotropic substances;
9. Illicit dealing in stolen and other goods;
10. Kidnapping, illegal restraint, hostage-taking;
11. Murder, grievous bodily injury;
12. Woman and child trafficking;
13. Smuggling:
14. Unauthorized cross-border transfer of domestic and foreign currency;
15. Theft or robbery or Dacoity;
16. Trafficking in human beings;
17. Dowry;
18. Smuggling and vat related crime;
19. Tax related crime;
20. Plagiarism;
21. Terrorism and Terrorist Financing;
22. Counterfeiting and Piracy of Products;
23. Environmental Crime;
24. Sexual Exploitation;
25. Taking market advantage through transactions by using price sensitive information of the capital market before it becomes public and trying to control or manipulate the market to gain personal advantage (Insider trading and market manipulation);
26. Organized Crime;
27. Realizing money through intimidation and
28. Any other offence which Bangladesh Bank with the approval of the Government and by notification in the Official gazette declares as predicate offence for the purpose of this Act.

2.3 PROPERTY MEANS
1. Any kind of assets, whether tangible or intangible, movable or immovable, however acquired; or
2. Cash, legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets.

2.4 REPORTING ORGANIZATION
1. Banks;
2. Financial Institutions;
3. Insurance companies;
4. Money Changers;
5. Companies or organizations remitting or transferring money;
6. Other business organizations approved by Bangladesh Bank;
7. (i) Stock Dealer and Stock Broker,
   (ii) Portfolio Manager and Merchant Bank,
   (iii) Security Custodian,
   (iv) Asset Manager;
8. (i) Non Profit Organization,
   (ii) Non Government Organization,
   (iii) Co-operative Society;
9. Real Estate Developer
10. Precious Metal & Stone business;
11. Trust & Company service provider;
12. Lawyer, Notary, Other law related profession & Accountant
13. Such other organizations as the Bangladesh Bank with the approval of Government may notify from time to time

2.5 SUSPICIOUS OR UNUSUAL TRANSACTION

- A transaction that substantially deviates from the usual norm by which that transaction is usually conducted, or
- There is reasonable cause to believe that the transaction is related to any proceeds acquired through or earned from crime or predicate offence or related financing on terrorism.

2.6 THE OFFENCE OF MONEY LAUNDERING

The money laundering offences are, in summary:

1. **Offence of Money Laundering:** The act of money laundering will be treated as an offence [See Section 4(1) of the Act].
2. **Offence Committed by a Company:** If any offence under this Act has been committed by a company then every proprietor, director, manager, secretary, or other officer or employees or representative who had direct involvement with the offence shall be deemed to be guilty for such offence [See Section 27 of the Act]. However, it is a defense for any person as aforesaid can prove that such offence was committed without his knowledge or it has occurred despite his best efforts to prevent it [See Section 27 of the Act].
3. **Offence of Not Retaining Information:** It is an offence for reporting organizations not to retain correct and full information used to identify their customers during their account relationships. It is also an offence for reporting organizations not to retain transaction related records for at least 5 (Five) years after termination of relationships with the customers [See Section 25(1) Kha of the Act].
4. **Offence of Not Reporting Suspicious Transactions:** It is also an offence for reporting organizations not to make a report to Bangladesh Bank where they suspect that a money laundering offence has been or is being committed [See Section 25(1) Gha of the Act].
5. **Offence of Not Providing Information on Demand:** It is also an offence for reporting organizations not to provide customer identification and transaction records to Bangladesh Bank from time to time on demand.
6. **Offence of Violating Freezing or Attachment Order:** It is an offence for any person to violate any freezing order or attachment order passed under this Act [See Section 5 of the Act].
7. **Offence of Divulging Information:** It is an offence for a person to divulge any information relating to an investigation or any other related information to any person, organization or news media for the purpose of frustrating the investigation or making adverse influence over the investigation [Section 6(1) of the Act].
8. **Offence of Using or Publishing Information:** It is also an offence for any person, organization or agent authorized under the Act to use, publish or divulge
any information except for the purpose of the Act, which was collected, received, retrieved and known by him/her during the period of his/her employment or appointment period or after completion of his/her employment or appointment contract [Section 6(2) of the Act].

9. **Offence of Obstructing or Refusing to Assist an Investigation:** It is an offence under the Act for any person to obstruct or refuse to assist the investigating officer engaged in any investigation under the Act [Section 7(1)(Ka) of the Act].

10. **Offence of Refusing to Submit Reports:** It is an offence under the Act for any person or refuse to submit reports or supply information without any reasonable ground under the Act [Section 7(1)(Kha) of the Act].

11. **Offence of Providing False Information:** It is an offence for any person to provide false information knowingly about the sources of funds or the identity of an account holder or the beneficial owner or nominee of an account [Section 8(1) of the Act].

**2.7 PENALTIES FOR MONEY LAUNDERING OFFENCES**

All offences under the Act are cognizable, non-compoundable and non-bail able. All penalties for commencement of the offences have prison terms and/or fines as prescribed in the Act as follows:

i. **Penalty for Offence of Money Laundering:** Any person engaged in money laundering or abetting, aiding or conspiring in the commission of such offence shall be punishable with imprisonment for a term not less than 4 (four) years and a maximum not exceeding 12 (twelve) years, and in addition a fine of Taka 10 (ten) Lac or the double amount of assets value earned from the predicate crime(s), which is higher [See Section 4(2) of the Act]. Property involved with the offence may be forfeited in favor of the state [See Section 4(3) of the Act]. If any company has been engaged in money laundering activity, either directly or indirectly, then a fine of Tk 20 (twenty) Lac or the double amount of assets value earned from the predicate crime(s), which is higher. The registration of that company shall be liable for cancellation [See Section 4(4) of the Act].

ii. **Penalty for Offence of Violating Freezing or Attachment Order:** If any person violates a freezing or order or an attachment order, then he/she will be punishable with an imprisonment not exceeding 3 (three) years or a fine amount of assets value related with freeze instruction, or both [See Section 5 of the Act].

iii. **Penalty for Offence of Divulging, Using or Publishing Information:** If any person divulges any information relating to an investigation or any other related information for frustrating the investigation or making adverse influence over the investigation or uses, publishes or divulges any information except for the purpose of the Act, then he/she will be punishable with an imprisonment not exceeding 2 (Two) years or a fine of not exceeding Taka 50 (fifty) thousand, or both [See Section 6(3) of the Act].
iv. **Penalty for Offence of Obstructing or Refusing to Assist an Investigation or Refusing to Submit Reports**: If any person obstructs or refuses to assist the investigating officer engaged in any investigation or refuses to submit reports or supply information without any reasonable ground under the Act, then he/she will be punishable with an imprisonment not exceeding 1 (One) year or a fine of not exceeding Taka 25 (twenty five) thousand, or both [See Section 7(2) of the Act].

v. **Penalty for Offence of Providing False Information**: If any person provides false information knowingly about the sources of funds or the identity of an account holder or the beneficial owner or nominee of an account, then he/she will be punishable with an imprisonment not exceeding 3 (three) years or a fine of not exceeding Taka 50 (Fifty) thousand, or both [See Section 8(2) of the Act].

### 2.8 RESPONSIBILITY OF REPORTING ORGANIZATIONS IN PREVENTION OF MONEY LAUNDERING:

For the purpose of preventing and identifying money laundering reporting organizations shall:

- keep the correct and full information of identification of its clients and during the operation of accounts;
- In case of closed account of any client, keep previous records of transactions of such account for at least five years from the date of closure;
- Provide, from time to time, the records kept under clause (a) and (b) to Bangladesh Bank time to time on demand from Bangladesh Bank;
- Inform proactively and immediately Bangladesh Bank, facts on suspicious/unusual/doubtful or transactions likely to be related to money laundering;

If any reporting organizations violate the directions mentioned in sub-section (1) Bangladesh Bank shall take the following actions:

- Bangladesh Bank may impose a fine of not less than Taka 50 (fifty) thousand and not more than Taka 25 (twenty five) Lac upon that reporting organization [See Section 25(2)(Ka) of the Act].
- In addition to the above fine as mentioned in sub section 25(2)(Kha) of the Act, Bangladesh Bank may cancel the permission or license of any Branch, Service Center, Booth or Agency of the company. And where appropriate, Bangladesh Bank shall inform the permitting or licensing authority of the reporting organizations so that the concerned authority may take necessary actions against the concerned reporting organization in accordance with their own laws or rules and regulations [See Section 25(2)(Kha) of the Act].
- Bangladesh Bank will collect the penalty money imposed under subsection (2) in its self determined manner and shall deposit the collected money into the government treasury.
2.9 PROTECTION AGAINST PROCEEDINGS UNDERTAKEN IN GOOD FAITH

No suit, prosecution either civil or criminal or other legal proceedings shall lie against government or any government officials or any reporting organizations if any person is affected or likely to be affected due to the proceedings done in good faith under this Act.

2.10 COMPLIANCE REQUIREMENTS UNDER ANTI TERRORISM (AMENDED) ACT, 2012

According to section 16 of Anti Terrorism (Amendment) Act, 2012, reporting agencies’ responsibilities to combat financing of terrorism are -

1) Every reporting agency shall take necessary measures, with appropriate caution and responsibility, to prevent and identify financial transactions which are connected to any offence under this Act and if any suspicious transaction is identified, the agency shall spontaneously report it to the Bangladesh Bank without any delay.

2) The Board of Directors, or in the absence of the Board of Directors, the Chief Executive Officer, by whatever name called, of each reporting organization shall approve and issue directions regarding the duties of its officers, and shall ascertain whether the directions issued by Bangladesh Bank under section 15, which are applicable to the reporting agency, have been complied with or not.

2.11 PENALTIES UNDER ANTI TERRORISM (AMENDED) ACT, 2012

The provision laid down in section 16 (3) of Anti Terrorism (Amendment) Act, 2012, if any reporting agency fails to comply with the directions issued by Bangladesh Bank under section 15 or knowingly provides any wrong or false information or statement, the said reporting agency shall be liable to pay a fine determined and directed by Bangladesh Bank not exceeding Taka 10 (ten) lacs and Bangladesh Bank may suspend the registration or license with intent to stop operation of the said agency or any of its branches, service centers, booths or agents within Bangladesh or, as the case may be, shall inform the registering or licensing authority about the subject matter to take appropriate action against the agency. According to section 16 (4) if any reporting agency fails to pay or does not pay any fine imposed by Bangladesh Bank according to subsection 16 (3) of ATA, Bangladesh Bank may recover the amount from the reporting agency by debiting its accounts maintained in any bank or financial institution or Bangladesh Bank and in case of any unrealized or unpaid amount, Bangladesh Bank may, if necessary, apply before the concerned court for recovery.
2.12 SUPERVISORY POWER OF BANGLADESH BANK

According to the provision laid down in the section 23 of MLPA, 2012 and section 15 of Anti terrorism (Amendment) Act, 2012, Bangladesh Bank is the core implementing agency. The major supervisory powers are:
Under MLPA, 2012, Bangladesh Bank shall have the following powers and responsibilities to prevent money laundering and to resist any such activities:

a) to analyze or review information related to cash transactions and suspicious transactions received from any reporting organization and to collect additional information relating thereto for the purpose of analyzing or reviewing from the reporting organizations and maintain data on the same and, as the case may be, provide with the said information to the relevant law enforcement agencies for taking necessary actions;
b) ask for any information or obtain a report from reporting organizations with regard to any transaction in which there are reasonable grounds to believe that the transaction is involved in money laundering or a predicate offence;
c) issue an order to any reporting organization to suspend or freeze transactions of any account for a period not exceeding 30 (thirty) days if there are reasonable grounds to suspect that any money or property has been deposited into the account by committing any offence. Provided that such order may be extended for additional period of a maximum of 6 (six) months by 30 (thirty) days, if it appears necessary to find out correct information relating to transactions of the account;
d) issue, from time to time, any direction necessary for the prevention of money laundering to the reporting organizations;
e) monitor whether the reporting organizations have properly submitted information and reports requested by Bangladesh Bank and whether they have duly complied with the directions issued by it, and where necessary, carry out on-site inspections of the reporting organizations to ascertain the same;
f) arrange meetings and seminars including training for the officers and staff of any organization or institution, including the reporting organizations, considered necessary for the purpose of ensuring proper implementation of this Act by Bangladesh Bank;
g) carry out any other functions necessary for the purposes of this Act.

The power and responsibilities of Bangladesh Bank under section 15(1) of Anti Terrorism (Amendment) Act, 2012 are as follows:
The Bangladesh Bank shall have the power and authority to take necessary measures to prevent and detect transaction intended to commit offence under ATA through any banking channel, and for that matter BB is empowered and authorized to –

- Call for STRs from reporting organizations and keep such report confidential if law does not allow disclosure;
- Compile and preserve all statistics and records;
- Create and maintain a database of all STRs;
- Analyze the STRs;
• Issue order in writing to reporting organizations to suspend a transaction for a period of 30 days where it has reasonable grounds to suspect that the transaction involves connection with terrorist acts, and extend the order to maximum 180 days.
• Monitor and observe the activities of reporting organizations;
• Issue instructions to reporting organizations directing them to take preventive measures against terrorist financing activities.
• Inspect reporting organizations for the purpose of detection of suspicious transactions connected with terrorist financing; and
• Provide training to staff and officers of reporting organizations for the purpose of detection and prevention of suspicious transactions as may be connected with terrorist financing.

It is to be noted that no law enforcement authority shall have any access to the documents or files of a financial institution without approval from the chief executive of the concerned financial institution or from Bangladesh Bank.
Chapter- III
POLICY FOR PREVENTION OF MONEY LAUNDERING & TERRORIST FINANCING

In order to arrest money laundering and bring about discipline and transparency in financial system and for safeguarding the economy, society and security Prime Bank Limited has made an attempt to frame Guidelines on Prevention of Money Laundering & terrorist Financing which would cover the following:

1. Broad Policy for Prevention of Money Laundering & Terrorist Financing
2. Organization chart for implementing AML/CFT Policy
3. Establishment of Customer’s Identity
4. Anti-Money Laundering Process
5. Recognition and Reporting of Suspicious Transactions
6. Cash Transaction Report (CTR)
7. Self Assessment Independent Testing Procedure
8. Record keeping

3.1 BROAD POLICY FOR PREVENTION OF MONEY LAUNDERING & TERRORIST FINANCING

It includes senior management commitment to the anti-money laundering program. More clearly, senior management must evolve such a culture for the Bank so that all the employees strictly adhere to each and every provision of Money Laundering Prevention Act-2012 and Anti Terrorist (Amended) Act-2012. An ethos should be created amongst the organization that money laundering and terrorist financing, the criminal acts, must be combated and each and every officer has a bounden responsibility to make the Bank free from the clutches of money launderers.

There should be a policy of compliance with all laws and regulations which are designated to deter money laundering and it should go to all employees of the Bank as a message from the top management. There should also be a policy that every new entrant, either fresh or lateral, must give a declaration that he/she will strictly adhere to anti-money laundering policy pursued by the Bank. Besides, all employees of the Bank irrespective of the positions they hold are accountable to the top management and regulatory body for their activities which might directly or indirectly relate to money laundering.

The Chief Executive Officer of the Bank shall, on annual basis, send a statement of compliance policy in this regard to all employees of the Bank which, at minimum, must contain the following:

i. That each and every employee of the Bank is required to comply with applicable laws and regulations and maintain ethical standards;
ii. That all activities being carried out by our Bank are in conformity with laws, regulations in force and instructions of Bangladesh Bank issued from time to time.

iii. That complying with relevant laws, rules and regulations is the individual responsibility of each employee working in the Bank. It should be made clear that ignorance of any of the provisions of law, rules, regulations is no excuse for non-compliance.

iv. That there is a well defined reporting procedure for compliance with Money Laundering Prevention Program of the Bank.

v. That customer’s identity is appropriately established by the officers rendering services to him either in liability or in asset viewpoint and also for other ancillary services. KYC procedures should be followed in this regard.

3.2.1 ORGANIZATION CHART FOR IMPLEMENTING AML/CFT POLICY

With a view to implementing any policy it is imperative that an organization should have an organogram depicting the position of people working there with job description and responsibilities having dot lines for making them accountable to the organization for their activities. Anti-money laundering program has been taken up as a serious and important policy to be implemented in our Bank for which it is proposed that there should be a Central Compliance Committee in the Bank which may consist of the following members:

<table>
<thead>
<tr>
<th>Sl.</th>
<th>Position in the Bank</th>
<th>Position in the Committee</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Chief Risk Officer (CRO)</td>
<td>Chairman</td>
</tr>
<tr>
<td>2.</td>
<td>Chief Internal Control &amp; Compliance Officer (CICCO)/CAMLCO</td>
<td>Member</td>
</tr>
<tr>
<td>3.</td>
<td>Chief Operating Officer (COO)</td>
<td>Member</td>
</tr>
<tr>
<td>4.</td>
<td>Head of ICCD</td>
<td>Member</td>
</tr>
<tr>
<td>5.</td>
<td>Head of ID</td>
<td>Member</td>
</tr>
<tr>
<td>6.</td>
<td>Head of Anti Money Laundering Department / Deputy CAMLCO</td>
<td>Member</td>
</tr>
</tbody>
</table>

The Central Compliance Committee shall directly report to the Chief Executive Officer. The Central Compliance Officer shall report to the Regulatory Body i.e. Bangladesh Bank for any matter relating to money laundering or any transaction susceptible to money laundering under intimation to the Central Committee and the Chief Executive Officer.
Organizational Chart for implementing AML/CFT Policy:

**Organization Chart**

- Board of Directors
- Managing Director & CEO
- Chief Anti-Money Laundering Compliance Officer (CAMLCO)
- Central Compliance Committee
- Head of AML Department /Deputy CAMLCO
- Policy & Guidelines Unit
- Statements & Returns Unit
- Compliance & Monitoring Unit
- Training & Development Unit
3.2.2 JOB DESCRIPTION AND RESPONSIBILITIES

Chief Anti Money Laundering Compliance Officer (CAMLCO):

i. To monitor, review and coordinate application and enforcement of the Bank’s compliance policies including Anti-Money Laundering Compliance Policy. This will include anti-money laundering risk assessment, practices, procedures and controls for account opening, KYC procedures and ongoing account/transaction monitoring for detecting suspicious transactions and account operational records.

ii. To monitor changes in laws, rules and regulations and also the instructions of Bangladesh Bank which may require the AML program to be revised from time to time.

iii. To respond to questions relating to compliance and concerns of employees and advise operational units in Head Office, Branches, SME Service Centers and Booth(s).

iv. To assist Operational Units in Head Office, Branches, SME Service Centers and Booth(s) in providing solutions to problems cropped up from activities or transactions related to money laundering.

v. To ensure that the Bank’s AML program is comprehensive and updated.

vi. To maintain ongoing awareness of new and changing business activities susceptible to money laundering risks and identify potential compliance issues deemed to be reasonably vulnerable to money laundering risks.

vii. To develop knowledge of all employees, particularly the compliance officers in respect of AML program.

viii. To develop and maintain ongoing relationships with regulatory authorities, external and internal audit teams, Head of Branches, SME Service Centers and Booth(s) for assisting them in early identification of issues which may be susceptible to money laundering risks.

ix. To assist in review of control procedures in the Bank so as to ensure legal and regulatory compliance and in the development of adequate testing procedures to detect and prevent lapses in compliance issues.

x. To monitor business self-testing for AML compliance and take corrective action.

xi. To manage Suspicious Activity Reporting Process which refers to:

- reviewing transactions referred by operational units in Head Office, Branches, SME Service Centers and Booth(s) as suspicious.
- reviewing the Transaction Monitoring Reports
- ensuring that internal suspicious activity reports:
are prepared as and when they appear to be appropriate.

- reflect the uniform standard for “suspicious activity involving possible money laundering established in the policy”.
- are accompanied by documentation of the Branches’ decisions to retain or terminate the account, as required under the policy.
- are advised to other branches who may have relationship with customer.
- are reported to the Chief Executive Officer and the Board of Directors when the suspicious activity is adjudged to represent sufficient risk to the Bank including reputation risk.

- ensuring that a documented plan of corrective action appropriate for the seriousness of the suspicious activity.
- maintaining a review and follow up process to ensure that planned corrective action, including possible termination of an account, be taken in a timely manner.
- managing the process for reporting suspicious activity to Bangladesh Bank authorities after appropriate internal consultations.

Besides the above, a brief description of role and responsibilities of individual officer/ executive involved in anti-money laundering program of the Bank in branch level/head office level is given below:

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Account Officer / Relationship Manager / Officers involved in Account opening | - To exercise due diligence in establishing the identity of customer prior to opening the Account.  
- To obtain as much information as possible on the customer that might help proper consideration of the nature and type of account.  
- To ensure that all required documents in respect of account opening are obtained and proper documentation is complete in case of loan account.  
- To ensure that transaction profile is obtained and reviewed when transactions are being carried out.  
- To obtain documentary evidence of large cash transactions are being carried out.  
- To report to Branch Manager and concerned higher authority for any suspicious transaction, he deems necessary. |
| Customer Service Officer | - To support the account officer in respect of the above  
- To perform the jobs of Account Officer in his absence. |
<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Operations Manager                                    | • To ensure that all control points are taken into account prior to taking place of any transaction.  
• To exercise ongoing due diligence in respect of trends of transactions on customers’ accounts.  
• To update customer transaction profile in the ledger.                                                                                                                                                                                                                     |
| Branch Anti-Money Laundering Compliance Officer (BAMLCO) | • To manage transaction monitoring process  
• To report on suspicious transaction to Head of Branch  
• To make Officials of Branch aware of AML program.  
• To update Bank’s AML Policy in line with any change or revision in the country’s AML policy.  
• To submit Branch Returns to Chief Compliance Committee                                                                                                                                                                                                 |
| Head of Branch or Booth/ Operational Head in Head Office | • To ensure that AML program is effectively accomplished in the Branch or Booth.  
• To act as first point of contact in respect of any AML issue.                                                                                                                                                                                                                     |
| Head of Ant-Money Laundering Department               | • To Assist Central Compliance Committee/Central Compliance Officer in implementing and enforcing the Bank’s AML Policies.  
• To implement and to enforce the Bank’s AML policies.  
• To report on suspicious clients to Bangladesh Bank through Central Compliance Committee/Central Compliance Officer.  
• To inform Head of Branch or all Divisional Head in the Head Office of required action related to AML program.  
• To turn up the employees on AML program as an ongoing policy.                                                                                                                                                                                                             |
| Central Compliance Committee                          | • To ensure that the Bank’s all business activities are carried out in conformity with AML program and that an effective AML program is in place in the Bank.                                                                                                                                                      |
3.3.1 GENERAL PROCEDURE FOR CUSTOMER DUE DILIGENCE (CDD) OR KNOW YOUR CUSTOMER (KYC)

i. Having sufficient information about your customer - “know your customer” (KYC) - and making use of that information underpins all anti-money laundering efforts, and is the most effective defense against being used to launder the proceeds of crime. If a customer has established an account using a false identity, s/he may be doing so to defraud the Bank itself, or to ensure that s/he cannot be traced or linked to the crime the proceeds of which the Bank is being used to launder. A false name, address or date of birth will usually mean that law enforcement agencies cannot trace the customer if s/he is needed for interview as part of an investigation.

ii. Section 25(Ka) of the Prevention of Money Laundering Act 2012 requires all concerned to seek satisfactory evidence of the identity of those with whom they deal. Unless satisfactory evidence of the identity of potential customers is obtained in good time, the business relationship must not proceed.

iii. When a business relationship is being established, the nature of the business that the customer expects to conduct with the Bank should be ascertained at the outset to establish what might be expected later as normal activity. This information should be updated as appropriate, and as opportunities arise. In order to be able to judge whether a transaction is or is not suspicious, the concerned officer needs to have a clear understanding of the business carried on by their customers.

iv. The concerned officer must establish to his satisfaction that he is dealing with a real person (natural, corporate or legal), and must verify the identity of persons who are authorized to operate any bank or investment account, or transact business for the customer. Whenever possible, the prospective customer should be interviewed personally.

v. The verification procedures needed to establish the identity of a prospective customer should basically be the same whatever type of account or service is required. The best identifying documents possible should be obtained from the prospective customer i.e. those that are the most difficult to obtain illicitly. No single piece of identification can be fully guaranteed as genuine, or as being sufficient to establish identity so verification will generally be an ongoing process. The overriding principle is that every concerned officer must know who are his customers, and he must have the necessary documentary evidence to verify this.

Section 25(Kha) of the Act requires that records of the verification of identity must be retained for five years after an account is closed or the business relationship is terminated.

vi. The concerned officers should include some key elements in the design of KYC program. Such essential elements should start from the Bank’s risk management and control procedures and should include (1) customer acceptance policy, (2) customer
identification, (3) on-going monitoring of high risk accounts and (4) identification of suspicious transactions. They should not only establish the identity of their customers, but should also monitor account activity to determine those transactions that do not conform to the normal or expected transactions for that customer or type of account. KYC should be a core feature of the Bank’s risk management and control procedures, and be complemented by regular compliance reviews and internal audit.

vii. The ICT Division will be responsible for developing automated systems and processes for classifying customers on the basis of the risk matrix provided by Bangladesh Bank, monitoring transactions with the transaction profile provided by the customers. These new systems will improve our ability to detect unusual transactions, help the authorities to identify and respond to new money laundering and terrorist financing techniques. We will continue to enhance the use of automated systems to monitor account activities and, in conjunction with the relevant authorities, to respond to new and more sophisticated trends and techniques adopted by criminals.

viii. Branch Managers/ BAMLCOs will monitor customers transaction regularly in order to identify suspicious transaction/activities relates to both money laundering and terrorist financing. He will also oversee the day to day activities at the branch and confirm compliance of the instructions of concerned authority.

3.3.2 CUSTOMER ACCEPTANCE POLICY

Customers are vitally important for banking business. Increasing competition is forcing banks to pay much more attention to satisfy customers. Our motto is to extend best services to our customers. We are also aware that sometimes customers pose the risk of money laundering and financing of terrorism to the financial institutions particularly the banks. So the inadequacy or absence of KYC standards can result in serious customer and counterparty risks, especially reputational, operational, legal and compliance risks. Collecting sufficient information about our customers is the most effective defense against being used as the medium to launder the proceeds of crimes and to finance the terrorism through bank accounts. As per Sec. 25 of Money Laundering Prevention Act-2012 each bank requires to keep satisfactory evidence of the identity of those it deals with and also requires making necessary arrangement to prevent any transaction related to crimes as described in Anti Terrorism Act (Amend)-2012. It is also the responsibility of each bank to identify suspicious transactions of their customers with due care and diligence. Pursuant to above legal bindings, Sec. 5.3 of Guidance Notes on Prevention of Money Laundering issued by Bangladesh Bank and apropos to international standard the Management of the bank has developed the Customer Acceptance Policy as under:

1) No account shall be opened in anonymous or fictitious name.
2) No numbered account (A/C without a title) shall be opened.
3) Uniform A/C Opening Forms, KYC Profile Form and Transaction Profile Form developed in line with the guidelines of Bangladesh Bank should be properly filled in.
4) Customers’ risk must be assessed as per parameters of risk perception as clearly defined in KYC Profile Form.

5) Documentation requirements and other information must be collected keeping in mind the instructions contained in AML Circular No. 2 dated 17.06.2002, the requirements of the AML Act-2012, the Anti-Terrorism Act(Amend)-2012 and other Circulars and guidelines issued by Bangladesh Bank from time to time.

6) The branch shall not open an account, where the bank is unable to apply appropriate customer due diligence measures i.e. the branch is unable to verify the identity and/or obtain documents required due to non-cooperation of the customer or non reliability of the data/information furnished to the branch. But the branch must be careful to avoid unnecessary harassment of the customer.

7) If it becomes necessary to close an existing account due to non-cooperation of the customer in providing necessary documents/information required by law/regulatory authority or non-reliability of the information/documents furnished by the customer, the branch must be vigilant in doing so. For example, decision to close an account should be taken at a reasonably high level after giving due notice to the customer explaining the reasons for such a decision.

8) In case of opening a Politically Exposed Person’s (PEP) account, the branch shall comply the instructions contained in AML Circular No. 14 dated 25.09.2007 issued by Bangladesh Bank. Such types of account will be classified as high risk and will be required very high level monitoring.

9) At the time of opening new account the branch must take care to seek only such information from the customer which is relevant and is not intrusive. It is mentioned that the customer profile is a confidential document and the details contained therein shall not be divulged for any other purposes.

10) Source of funds, income or wealth and complete information on the actual or beneficial owners of the accounts holding 20% or more share of the account must be obtained at the time of opening of any account.

11) The branch will strive not to cause inconvenience to the general public, especially those who are financially or socially disadvantaged.

12) The branch will conduct necessary checks before opening a new account so as to ensure that the identity of the customer does not match with any person with known criminal background or with banned entities such as individual terrorists or terrorist organizations etc.

13) In case of establishing correspondent banking relationship, the branch/concerned division/department shall follow the guidelines as contained in AML Circular No. 7 dated 14.08.2005 meticulously.

14) The branch shall verify the identity of the customer using reliable sources, documents etc. but it must retain copies of all references, documents used to verify the identity of the customer.

15) The branches, where locker service facilities exist, will follow the identification procedure for their customers.
It is important to bear in mind by all employees of the bank that the customer identification process does not end at the point of application. Once account relationship has been established, reasonable steps should be taken by the branch from time to time to ensure that descriptive information is kept updated.

In developing customer acceptance policy the following important factors are required to be taken into consideration:

i) Customer’s background

ii) Country of origin

iii) Public or high profile position

iv) Linked accounts

v) Volume of business activities

vi) Risks associated in the business of customers

vii) Other risk indicators

viii) Basic requirements for Account Opening

ix) All information available for judging the creditworthiness of borrowers.

x) All information on walk-in customers as required in AML circular

### 3.3.3 CUSTOMER IDENTIFICATION

1. Customer identification is an essential element of KYC standards. For proper identification a customer includes the following:
   - the person or entity that maintains an account with the Bank or those on whose behalf an account is maintained (i.e. beneficial owners);
   - the beneficiaries of transactions conducted by professional intermediaries; and
   - any person or entity connected with a financial transaction who can pose a significant reputational or other risk to the Bank.

2. The customer identification process applies naturally at the outset of the relationship. To ensure that records remain up-to-date and relevant, there is a need for the concerned officers to undertake regular reviews of existing records. An appropriate time to do so is when a transaction of significance takes place, when customer documentation standards change substantially, or when there is a material change in the way that the account is operated. However, if an officer becomes aware at any time that it lacks sufficient information about an existing customer, he should take steps to ensure that all relevant information are obtained as quickly as possible.

3. Whenever the opening of an account or business relationship is being considered, or a one-off transaction or series of linked transactions to be undertaken, identification procedures must be followed. Identity must also be verified in all cases where money laundering is known, or suspected.

4. Once verification of identity has been satisfactorily completed, no further evidence is needed when other transactions are subsequently undertaken.
What Constitutes a Person’s Identity:

1. Identity generally means a set of attributes which uniquely define a natural or legal person. There are two main constituents of a person’s identity, remembering that a person may be any one of a range of legal persons (an individual, body corporate, partnership, etc). For the purpose of this guideline, the two elements are:
   - the physical identity (e.g. name, date of birth, TIN/voter registration/passport/ID number, etc.); and
   - the activity undertaken.

2. Confirmation of a person’s address is also useful in determining whether a customer is resident in a high-risk country. Knowledge of both residence and nationality may also be necessary, in a non money-laundering context, to avoid breaches of UN or other international sanctions to which Bangladesh is a party. Where a passport is taken as evidence, the number, date and place of issue should be recorded.

3. The other main element in a person’s identity is sufficient information about the nature of the business that the customer expects to undertake, and any expected or predictable pattern of transactions. For some business these may be obvious, however, for more complex businesses this may not be the case. The extent of description required will depend on the concerned officer’s own understanding of the applicant’s business.

4. When commencing a business relationship, concerned officers should consider recording the purpose and reason for establishing the business relationship, and the anticipated level and nature of activity to be undertaken. Documentation about the nature of the applicant’s business should also cover the origin of funds to be used during the relationship. For example, funds may be transferred from a bank or the applicant’s employer, or be the proceeds of a matured insurance policy, etc.

5. Once account relationship has been established, reasonable steps should be taken by the concerned officer to ensure that descriptive information is kept up to date as opportunities arise. It is important to emphasize that the customer identification process do not end at the point of application. The need to confirm and update information about identity, such as changes of address, and the extent of additional KYC information to be collected over time will differ from sector to sector and between institutions within any sector. It will also depend on the nature of the product or service being offered, and whether personal contact is maintained enabling file notes of discussion to be made or whether all contact with the customer is remote.
**Individual Customers:**

1. Where verification of identity is required, the following information should be obtained from all individual applicants for opening accounts or other relationships, and should be independently verified by the concerned officer himself/herself:
   - true name and/or names used;
   - parent’s names;
   - date of birth;
   - current and permanent address;
   - details of occupation/employment and sources of wealth or income

2. One or more of the following steps is recommended to verify addresses:
   - provision of a recent utility bill, tax assessment or bank statement containing details of the address (to guard against forged copies it is strongly recommended that original documents are examined);
   - checking the Voter lists;
   - checking the telephone directory;
   - record of home/office visit.

   The information obtained should demonstrate that a person of that name exists at the address given, and that the applicant is that person.

3. The date of birth is important as an identifier in support of the name, and is helpful to assist law enforcement. Although there is no obligation to verify the date of birth, this provides an additional safeguard. It is also helpful for residence/nationality to be ascertained to assist risk assessment procedures and to ensure that the Bank does not breach UN or other international financial sanctions.

4. Identification of documents, either originals or certified copies, should be pre-signed and bear a photograph of the applicant, e.g.:-
   i) Current valid passport;
   ii) Valid driving license;
   iii) Voter ID Card;
   iv) Armed Forces ID card;
   v) A Bangladeshi employer ID card bearing the photograph and signature of the applicant; or
   vi) A certificate from any local government organs such as Union Council Chairman, Ward Commissioner, etc. or any respectable person acceptable to the Bank.

5. Identification documents which do not bear photographs or signatures, or are easy to obtain, are normally not appropriate as **sole** evidence of identity, e.g. birth certificate, credit cards, non-Bangladeshi driving license. Any photocopies of documents showing photographs and signatures should be plainly legible. Where
applicants put forward documents with which the concerned officer is unfamiliar, either because of origin, format or language, he must take reasonable steps to verify that the document is indeed genuine, which may include contacting the relevant authorities or obtaining a notarized translation. The concerned officers should also be aware of the authenticity of passports.

6. Where there is no face-to-face contact, and photographic identification would clearly be inappropriate, procedures to identify and authenticate the customer should ensure that there is sufficient evidence, either documentary or electronic, to confirm address and personal identity. At least one additional check should be undertaken to guard against impersonation. In the event that internal procedures require sight of a current passport or ID Card where there is no face-to-face contact, then a certified true copy should be obtained.

7. There is obviously a wide range of documents which might be provided as evidence of identity. It is for each concerned officer to decide the appropriateness of any document in the light of other procedures adopted. However, particular care should be taken in accepting documents which are easily forged or which can be easily obtained using false identities.

8. In respect of joint accounts where the surname and/or address of the account holders differ, the name and address of all account holders, not only the first named, should normally be verified in accordance with the procedures set out above.

9. Any subsequent change to the customer’s name, address, or employment details of which the concerned officer becomes aware should be recorded as part of the know your customer process. Generally this would be undertaken as part of good business practice and due diligence but also serves for money laundering prevention.

10. **File copies of supporting evidence should be retained.** Where this is not possible, the relevant details should be recorded on the applicant's file. In case of one-off transactions the details should be recorded in a manner which allows cross reference to transaction records. Such institutions may find it convenient to record identification details on a separate form similar to the example in Annexure D, to be retained with copies of any supporting material obtained.

11. An introduction from a respected customer personally known to the management, or from a trusted member of staff, may assist the verification procedure but does not replace the need for verification of address as set out above. Details of the introduction should be recorded on the customer's file. However, personal introductions without full verification should not become the norm, and directors/senior managers must not require or request staff to breach account opening procedures as a favor to an applicant.
Persons without Standard Identification Documentation:

1. Most people need to make use of the financial system at some point in their lives. It is important, therefore, that the socially or financially disadvantaged such as the elderly, the disabled, students and minors should not be precluded from obtaining financial services just because they do not possess evidence of identity or address where they cannot reasonably be expected to do so. In these circumstances, a common sense approach and some flexibility without compromising sufficiently rigorous anti-money laundering procedures is recommended. Internal procedures must allow for this, and must provide appropriate advice to the concerned officer on how identity can be confirmed in these exceptional circumstances. The important point is that a person's identity can be verified from an original or certified copy of another document, preferably one with a photograph.

2. A certifier must be a suitable person, such as for instance a lawyer, accountant, director or manager of a regulated institution, a notary public, a member of the judiciary or a senior civil servant. The certifier should sign the copy document (printing his name clearly underneath) and clearly indicate his position or capacity on it together with a contact address and phone number.

3. In these cases it may be possible for the concerned officer to accept confirmation from a professional (e.g. doctor, lawyer, directors or managers of a regulated institution, etc) who knows the person. Where the individual lives in accommodation for which he or she is not financially responsible, or for which there would not be documentary evidence of his/her address, it may be acceptable to accept a letter from the guardian or a similar professional as confirmation of a person’s address. A Head of Branch may authorize the opening of a business relationship if s/he is satisfied with confirmation of identity circumstances but must record his/her authorization on the customer’s file, and must also retain this information in the same manner and for the same period of time as other identification records.

4. For students or other young people, the normal identification procedures set out above should be followed as far as possible. Where such procedures would not be relevant, or do not provide satisfactory evidence of identity, verification might be obtained in the form of the home address of parent(s), or by making enquiries of the applicant’s educational institution.

5. Under normal circumstances, a family member or guardian who has an existing relationship with the Bank concerned would introduce a minor. In cases where the person opening the account is not already known, the identity of that person, and any other person who will have control of the account, should be verified.
Corporate Bodies and other Entities:

1. Because of the difficulties of identifying beneficial ownership, and the possible complexity of organization and structures, corporate entities and trusts are the most likely vehicles to be used for money laundering, particularly when a legitimate trading company is involved. Particular care should be taken to verify the legal existence of the applicant and to ensure that any person purporting to act on behalf of the applicant is authorized to do so. The principal requirement is to look behind a corporate entity to identify those who have ultimate control over the business and the company’s assets, with particular attention being paid to any shareholders or others who exercise a significant influence over the affairs of the company. Enquiries should be made to confirm that the company exists for a legitimate trading or economic purpose, and that it is not merely a “brass plate company” where the controlling principals cannot be identified.

2. Before a business relationship is established, measures should be taken by way of company search and/or other commercial enquiries to ensure that the applicant company has not been, or is not in the process of being, dissolved, struck off, wound-up or terminated. In addition, if the concerned officer becomes aware of changes in the company structure or ownership, or suspicions are aroused by a change in the nature of business transacted, further checks should be made.

3. Particular care should be exercised when establishing business relationships with companies incorporated or registered abroad, or companies with no direct business link to Bangladesh. Such companies may be attempting to use geographic or legal complication to interpose a layer of opacity between the source of funds and their final destination. In such circumstances, concerned officer should carry out effective checks on the source of funds and the nature of the activity to be undertaken during the proposed business relationship. This is particularly important if the corporate body is registered or has known links to countries without anti-money laundering legislation and procedures equivalent to Bangladesh’s. In the case of a trading company, a visit to the place of business may also be made to confirm the true nature of the business.

4. No further steps to verify identity over and above usual commercial practice will normally be required where the applicant for business is known to be a company, or a subsidiary of a company, quoted on a recognized stock exchange.

5. The following documents should normally be obtained from companies:

- Certified true copy of Certificate of Incorporation or equivalent, details of the registered office, and place of business;
- Certified true copy of the Memorandum and Articles of Association, or by-laws of the client.
- Copy of the Board resolution to open the account relationship and the empowering authority for those who will operate any accounts;
- Explanation of the nature of the applicant's business, the reason for the relationship being established, an indication of the expected turnover, the source of funds, and a copy of the last available financial statements where appropriate;
- Satisfactory evidence of the identity of each of the principal beneficial owners being any person holding 10% interest or more or with principal control over the company’s assets and any person (or persons) on whose instructions the signatories on the account are to act or may act where such persons are not full time employees, officers or directors of the company;
- Satisfactory evidence of the identity of the account signatories, details of their relationship with the company and if they are not employees an explanation of the relationship. Subsequent changes to signatories must be verified;
- Copies of the list/register of directors.

6. Where the business relationship is being opened in a different name from that of the applicant, the concerned officer should also satisfy himself that the reason for using the second name makes sense.

7. The following persons (i.e. individuals or legal entities) must also be identified in line with this part:
   - All of the directors who will be responsible for the operation of the account / transaction.
   - All the authorized signatories for the account/transaction.
   - All holders of powers of attorney to operate the account/transaction.
   - The beneficial owner(s) of the company
   - The majority shareholders of a private limited company.

A letter issued by a corporate customer similar to Annexure C is acceptable in lieu of passport or other photo identification documents of their shareholders, directors and authorized signatories. Where the concerned officer already knows their identities and identification records already accord with the requirements of these guidelines, there is no need to verify identity again.

8. When authorized signatories change, care should be taken to ensure that the identities of all current signatories have been verified. In addition, it may be appropriate to make periodic enquiries to establish whether there have been any changes in directors/shareholders, or the nature of the business/activity being undertaken. Such changes could be significant in relation to potential money laundering activity, even though authorized signatories have not changed.
Partnerships and Unincorporated Businesses:

1. In the case of partnerships and other unincorporated businesses whose partners/directors are not known to the Bank, the identity of all the partners or equivalent should be verified in line with the requirements for personal customers. Where a formal partnership agreement exists, a mandate from the partnership authorizing the opening of an account and conferring authority on those who will operate it should be obtained.

2. Evidence of the trading address of the business or partnership should be obtained and a copy of the latest report and accounts (audited where applicable).

3. An explanation of the nature of the business or partnership should be ascertained (but not necessarily verified from a partnership deed) to ensure that it has a legitimate purpose.

Powers of Attorney / Mandates to Operate Accounts:

The authority to deal with assets under a power of attorney constitutes a business relationship and therefore, where appropriate, it may be advisable to establish the identities of holders of powers of attorney, the grantor of the power of attorney and third party mandates.

Requirements in respect of Accounts Commenced Prior to 30 April 2002:

1. Anti-money laundering legislation and requirements in respect of KYC procedures for business relationships did not apply prior to 30th April 2002. It is, therefore, reasonable to assume that business relationships commenced before that date may not satisfy the requirements of this general guideline in terms of supporting documentary evidence. In some circumstances, the lack of up to date documentary evidence to support existing business relationships may pose operational and other risks to the Bank. Consequently, all relevant financial businesses must review existing business relationships commenced prior to 30th April 2002 to establish whether any documentary evidence required by their current KYC procedures is lacking. Bangladesh Bank has fixed the deadline on 31st March 2010 to complete the KYC for Accounts opened before 30th April 2002.

2. In order to review a pre 2002 account the Uniform KYC Form should be used. This form must be retained with client records, and will be treated as a constituent element of the institution’s KYC documentation for a pre-2002 account.

3. In carrying out their review of pre-2002 accounts, they must decide whether they will have to obtain any missing elements of the documentary evidence, or to decide that, in light of the existing nature of the business relationship, it is unnecessary to do so. Each business relationship must be treated in one way or the other. A decision must not be taken on the basis of categories or groups of clients.
4. When the nature of a business relationship is revised they should take into account a number of considerations, such as the length of time the relationship has been in place, the frequency with which the Bank has contact with the client, and the volumes and numbers of transactions. Such factors will help determine whether it is necessary to update or supplement KYC documentation already held.

5. Where it is decided to seek missing documentation, the concerned executives must do so at the earliest possible opportunity and persist until the information is received, or the original decision revised. Where missing information is not obtained within a reasonable period of time, they should consider termination of the business relationship.

6. As per Bangladesh Bank’s instruction vide AML Circular No. 23 dated 23/02/2010 the Account opened before 30th April 2002 which KYC procedures are not completed must be marked as “Dormant”. Customer should not be allowed for any withdrawal from the Account but he can make deposit in the Account. The Account may be regularized on customer written application after completion of KYC Procedures.

**Internet or Online Banking**

1. Banking and investment business on the Internet add a new dimension to Financial Institutions’ activities. The unregulated nature of the Internet is attractive to criminals, opening up alternative possibilities for money laundering, and fraud.

2. It is recognized that on-line transactions and services are convenient. However, it is not appropriate that the Bank should offer on-line line account opening allowing full immediate operation of the account in a way which would dispense with or bypass normal identification procedures.

3. However, initial application forms could be completed on-line and then followed up with appropriate identification checks. The account, in common with accounts opened through more traditional methods, should not be put into full operation until the relevant account opening provisions have been satisfied in accordance with this general guideline.

4. The development of technologies such as encryption, digital signatures, etc., and the development of new financial services and products, makes the Internet a dynamic environment offering significant business opportunities. The fast pace of technological and product development has significant regulatory and legal implications, and Bangladesh Bank is committed to keeping up to date with any developments on these issues through future revisions to this general guideline.

**Provision of Safe Custody and Safety Deposit Boxes:**

Where facilities to hold boxes, parcels and sealed envelopes in safe custody are made available, it is expected that the Bank will follow the identification procedures set out in these general guidelines. In addition, such facilities should only be made available to account holders.


**Timing and Duration of Verification:**

1. The best time to undertake verification is *prior to entry* into the account relationship. Verification of identity should, as soon as is reasonably practicable, be completed before any transaction is completed.

2. However, if it is necessary for sound business reasons to open an account or carry out a significant one-off transaction before verification can be completed, this should be subject to stringent controls which should ensure that any funds received are not passed to third parties. Alternatively, a senior member of staff may give appropriate authority.

3. This authority should not be delegated, and should only be done in exceptional circumstances. Any such decision should be recorded in writing.

4. Verification, once begun, should normally be pursued either to a satisfactory conclusion or to the point of refusal. If a prospective customer does not pursue an application, staff may (or may not) consider that this is in itself suspicious.

### 3.4.1 KNOW YOUR CUSTOMER PROCEDURES

1. Each concerned officer is required to perform due diligence on all prospective clients prior to opening an account. This process is completed by fulfilling the documentation requirements (Account Application, Bank References, Source of funds and Identification for example) and also a ‘Know Your Customer’ profile which is used to record a client’s source of wealth, expected transaction activity at its most basic level.

2. Once the identification procedures have been completed and the client relationship is established, the concerned officers should monitor the conduct of the relationship/account to ensure that it is consistent with the nature of business stated when the relationship/account was opened. The concerned officers do this firstly by way of being diligent, reporting suspicious transactions undertaken by the customer; updating the client’s KYC profile for any significant changes in their lifestyle (e.g., change of employment status, increase in net worth) and by monitoring the transaction activity over the client’s account on a periodic basis.

3. KYC profile gives the basic information about the customer like, Name, Address, Tel/Fax Numbers, line of business, Annual sales. If the customer is a Public Figure, the account will become automatically a High Risk Account.

4. The KYC Profile information will also include the observations of the Institution’s Staff/Officer when they visit the customer’s business place like, the business place is owned or rented, the type of clients visited, by what method is the client paid (cheque or cash). The Staff/Officer will record his observations and sign the KYC Profile form.
5. In the case of high net worth Accounts, the information will include net worth of the customer, source of funds etc.

6. The KYC Profile leads to Risk Classification of the Account as High/Low Risk.

3.4.2 RISK MANAGEMENT

1. Risk Categorization, Based on Activity/KYC Profile: At the time of opening accounts, the concerned officer must assess the risk that the accounts could be used for “money laundering”, and must classify the accounts as either High Risk or Low Risk. The risk assessment may be made using the Uniform KYC Profile Form in which following seven risk categories are scored using a scale of 1 to 5 where scale 4-5 denotes High Risk, 3- Medium Risk and 1-2 Low Risk:

   • Occupation or nature of customer’s business
   • Net worth / sales turnover of the customer
   • Mode of opening the account
   • Expected value of monthly transactions
   • Expected number of monthly transactions
   • Expected value of monthly cash transactions
   • Expected number of monthly cash transactions

2. Risk Assessment: The risk scoring of less than 14 indicates low risk and more than 14 would indicate high risk. The risk assessment scores are to be documented in the KYC Profile Form. However, management may judgmentally override this automatic risk assessment to “Low Risk” if it believes that there are appropriate mitigates to the risk. This overriding decision must be documented (reasons why) and approved by the Branch Manager, and Branch AML Compliance Officer.

3. Annual Update of KYC and Transaction Profile: KYC Profiles and Transaction Profiles must be updated and re-approved at least annually for “High Risk” accounts (as defined above). There is no requirement for periodic updating of profiles for “Low Risk” transactional accounts. These should, of course, be updated if and when an account is reclassified to “High Risk”, or as needed in the event of investigations of suspicious transactions or other concern.

4. Account of NGO/NPO: Accounts of Charities, Non-Profit Organizations, Non Government Organizations to be treated as high risk accounts by default and Enhanced
Due Diligence (EDD) must be performed for opening and operating such accounts in relation to combat financing of terrorism.

5. Politically Exposed Persons (PEPs): While opening and/or operating account of Politically Exposed Persons (PEPs) enhanced due diligence shall have to be exercised. PEPs means “Individuals who are or have been entrusted with prominent public functions in a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials”. All instructions as detailed for PEPs shall equally apply if business relationship is established with the family members and close associates of these persons who may pose reputational risk to the bank. If the customer is a Politically Exposed Person the account will automatically become a High Risk Account.

Following instructions shall have to be followed to ensure Enhanced Due Diligence, while opening and operating the account of Politically Exposed Persons (PEPs):

i. a risk management system shall have to be introduced to identify risks associated with the opening and operating accounts of PEPs;

ii. obtain senior management approval for establishing business relationships with such customers;

iii. take reasonable measures to establish the source of wealth and source of funds;

iv. ongoing monitoring of the transactions have to be conducted; and

v. the banks/financial institutions should observe all formalities as detailed in Guidelines for Foreign Exchange Transactions while opening accounts of non-residents;

The above instructions shall also be applicable to customers or beneficial owners who become PEPs after business relationship have been established.

3.4.3 TRANSACTION MONITORING PROCESS

1. Transaction Profile (TP): Transaction Profile (TP) is an important document for monitoring transactions and recognizing suspicious transactions. The following steps and points should be noted while preparing transaction profiles:

   ▪ Take interview with the customer and request him/her to fill in the Transaction Profile Form as recommended by Bangladesh Bank. The main features of the Form for both deposit and withdrawal would be:

   ▪ - Various types of transactions (i.e. nature of transactions)
   ▪ - No. of transactions (monthly)
   ▪ - Maximum size (per transaction)
   ▪ - Total value (monthly)

   ▪ Before filling in, it has to be ensured by the Designated Officer that the customer’s understanding is sufficient to fill the required cells of Transaction Profile Form.
• Assist customer in filling the Transaction Profile Form if any complexity arises.
• Officer must match the information mentioned in TP with all points covered in KYC guidelines. He has to establish normal resemblances between the two declared statements. Questions might be politely asked to customer for any noted discrepancy.

2. **Transaction Monitoring Process:** There should be systems and controls in place to monitor on an ongoing basis the relevant activities in the course of the business relationship. The nature of this monitoring will depend on the nature of the business. The purpose of this monitoring is for the Bank to be vigilant for any significant changes or inconsistencies in the pattern of transactions. Inconsistency is measured against the stated original purpose of the accounts i.e. the declared Transaction Profile (TP) of the Customer. Possible areas to monitor could be:
   a) transaction type
   b) frequency
   c) unusually large amounts
   d) geographical origin/destination
   e) changes in account signatories

It is recognized that the most effective method of monitoring of accounts is achieved through a combination of computerized and human manual solutions. A corporate compliance culture, and properly trained, vigilant staff through their day-to-day dealing with customers, will form an effective monitoring method as a matter of course. Computerized approaches may include the setting of “floor levels” for monitoring by amount. Different “floor levels” or limits may be set for different categories of customers. The floor levels may be fixed up by the Branch Management and Central Compliance Committee, as the case may be.

### 3.5 DETECTION AND REPORTING OF SUSPICIOUS TRANSACTIONS

1. **Statutory Obligation for Reporting of Suspicious Transactions:** Section 25(1)(Gha) of the Money Laundering Prevention Act-2012 obligates us to make a report to Bangladesh Bank where a suspicion arises that a money laundering offence has been or is being committed.

In this regard, all branches must ensure that,
• each relevant employee knows the person whom they should report as suspicious;
• there is a clear reporting chain under which those suspicions will be passed without delay to the Chief Anti Money Laundering Compliance Officer (CAMLCO).

Once employees have reported their suspicions to the appropriate person in accordance with the proper internal reporting procedure, they have fully satisfied their statutory obligations.
2. **How to Detect Suspicious Transactions:** As there are unlimited types of transactions that a money launderer or a terrorist financier may use, it is difficult to define a suspicious transaction. However, in most of the cases, a suspicious transaction will be one that is inconsistent with a customer’s known, declared, legitimate business or other personal activities. Therefore, the first key to detect that a transaction, or series of transactions, may be unusual is to know enough about the customer's transactions with the Bank.

At the time of determining whether a customer's transaction may be suspicious, a branch must consider the following questions:

- Is the size of the transaction consistent with the normal activities of the customer?
- Is the transaction rational in the context of the customer's business or personal activities?
- Has the pattern of transactions, conducted by the customer, changed?
- Where the transaction is international in nature, does the customer have any obvious reason for conducting business with the other country involved?

3. **Procedure for Reporting of Suspicious Transactions:** Every Business and individual has normally certain kind of transactions in line with their business/individual needs, which is declared in the Transaction Profile (TP) of the customer. Transactions inconsistent with the declared TP will be considered unusual. All officials of the Bank must be alert to transactions that are inconsistent with the customer’s KYC information. If any unusual transaction is found, then the employees who have noticed it should follow the following procedures to determine whether a STR should be filed or not:

- Review the account opening form, KYC documentation, transaction profile etc.
- Check to see if the subject has been reported previously for suspicious activity.
- Seek information about the subject of the investigation from other people, if necessary.
- Review account statement and transaction records of the customer who is the subject of the investigation. At least 6 months’ review of account activity should be done.
- Seek information from the respective officer who is responsible for opening the account or directly from the customer, if necessary. Before contacting with the customer, BAMLCO must be consulted with to assess whether it is appropriate to contact the customer.

If the issue appears reportable, then the concerned employee will immediately prepare a report as per the prescribed form (As per Annexure-Ka attached with AML Circular No. 19 dated 14/08/2008) and then send it to the BAMLCO. BAMLCO should acknowledge receipt of the report.

Sufficient information should be disclosed on the report, including the followings:

- Full details of the customer and the reason for the suspicion to enable the investigating officer to conduct appropriate enquiries.
▪ If a particular offence is suspected, this should be stated so that the report may be passed to the appropriate investigation team with minimum delay.
▪ Where additional relevant evidence is held which could be made available to the investigating officer, this should be noted on the form.

BAMLCO will analyze the reported incident properly in the light of all other relevant information and record in writing with reasons in details whether the transaction is connected with money laundering or terrorist financing or not. If the reported issue does not appear to be connected with money laundering, then BAMLCO will close the issue at his end after putting his comments on the STR form annexed in the Instruction Circular No.19/08 dated 21/09/2008. If the reported issue appears to be connected with money laundering or terrorist financing, then BAMLCO will send immediately the details of the incident along with a copy of the above form to the CAMLCO.

4. Maintaining Secrecy: The above review will be done as a part of the daily functions of the branch. It should be kept in mind that all exceptions may not be suspicious. Also, branch officials should be very much cautious in dealing with customers. They should perform the job in a manner that do not create any panic and do not disclose any information to any person.

5. Documents to be enclosed with the STR: At the time of forwarding an STR to the CAMLCO, BAMLCO should enclose the following documents with the STR Form:
   - Photocopy of Account Opening Form, KYC, Transaction Profile etc.
   - Photocopy of all documents related to Account Opening (including Passport, National ID Card, Trade License etc.),
   - Statement of the Account for at least 1 (One) year.
   - Relevant vouchers.

6. STR Register: All investigation issues must be documented in a register. The register should include the investigation issue and the rationale for the disposition of the case. In addition, any unusual activity for which decision was taken not to file a STR should also be documented in the register.

7. Disclosure to Bangladesh Bank: CAMLCO will examine and analyze the reports received and record its observations on the above form and if they consider the incident to be reportable, then they will submit the same directly to the General Manager & Operational Head, Bangladesh Financial Intelligence Unit, Bangladesh Bank within 7(Seven) days (for suspicion of Money Laundering) or 3(Three) days (for suspicion of Terrorist Financing) and maintain confidentiality.

At the time of deciding whether or not a report should be submitted to Bangladesh Bank, all other relevant information available within the Bank concerning the person or business should be considered. This may include a review of the followings:
- other transaction patterns and volumes through the account or accounts in the same name,
- the length of the relationship, and
- referral to identification records held.

Care should be taken to guard against a report being submitted to Bangladesh Bank as a matter of routine without undertaking reasonable internal enquiries to determine that all available information has been taken into account.

However, if employee continues to encounter suspicious activities on an account which they have reported previously, they should continue to make reports whenever a further suspicious transaction occurs.

8. **Requirements for Documentation**: All suspicious Activity Reports should be kept in custody for the following tenures:

- Records of suspicions, which were raised internally with the CAMLCO but not disclosed to Bangladesh Bank, should be retained for 5 (Five) years from the date of the transaction.
- Records of suspicions which Bangladesh Bank has advised to be of no interest should be retained for a similar period.
- Records of suspicions that assist with investigations should be retained until Prime Bank Limited is informed by Bangladesh Bank that they are no longer required.

9. **Internal Reporting**: All reports, statements, queries and communications related to anti-money laundering functions must be addressed to the following:

Deputy CAMLCO  
Anti-Money Laundering Department  
Prime Bank Limited  
Head Office  
SBC Tower, 37/A Dilkusha C/A  
Dhaka-1000.  
Telephone: +880-2-7160321  
Fax : +880-2-7126313  
E-Mail : aml@primebank.com.bd

9. **External Point of Contact for Reporting**: The national reception point for reporting of suspicions by the CAMLCO is:

The General Manager & Operational Head  
Bangladesh Financial Intelligence Unit  
Bangladesh Bank  
Head Office, Dhaka-1000.

Bangladesh Financial Intelligence Unit of Bangladesh Bank can be contacted during office hours at the following numbers:  
Telephone: +880-2-9530118  
Fax : +880-2-9530089
3.6 REPORTING OF CASH TRANSACTION REPORT (CTR)

The Branch Anti-Money Laundering Compliance Officer (BAMLCO) will monitor and analyze the daily cash transaction and prepare daily Cash Transaction Report (CTR) as per format given in appendix – Ka of AML circular – 10 in case of cash deposit, cash withdrawal and cash remittance/online deposit of Tk.10.00 lac and above in a single transaction or multiple transactions in any account in a single day. He or she will send CTR to Anti-Money Laundering Cell of Head Office by the 1st week of subsequent month for onward submission of the same to BFIU of Bangladesh Bank.

The BAMLCO will analyze the CTR(s) meticulously before reporting the same to AML Department. If something is found suspicious/unusual, the BAMLCO will report the Account as STR in prescribed format. If s/he don’t find any thing suspicious/unusual s/he will make a comments “we checked and didn’t find any suspicious in the CTR” and will send the forwarding to AML Cell of Head Office.

3.7 SELF ASSESSMENT & INDEPENDENT TESTING PROCEDURES SYSTEM

1. Self Assessment Process: All branches should establish self-assessment process that will assess how effectively the branch’s anti-money laundering procedures enable management to identify areas of risk or to assess the need for additional control mechanisms. Branches should follow the following steps to assess itself in a quarterly basis:
   ▪ Branches shall assess themselves and prepare a Report on the basis of Self Assessment Checklist attached with AML Circular No. 15 dated 24/03/2008 issued by Bangladesh Bank on a quarterly basis.
   ▪ On the basis of such assessment, the branch shall arrange a meeting on monthly basis of all important officials of the branch and to be presided over by the Branch Manager of the branch.
     The meeting shall –
     - discuss the branch’s self assessment report;
     - identify areas of risk/problem; if any
     - find out ways or recommendations to mitigate the risk/problem areas; and
     - maintain minutes;
     Next meetings shall also discuss -
     - the issues discussed in the previous meeting;
     - assigned responsibilities; and
     - their implementation status;
   ▪ Every branch shall send their
     - Self Assessment Report;
     - steps taken by the branch; and
     - recommendations in this regard;
     to the Anti-Money Laundering Cell and Internal Audit Department of Head Office within the 15th of the next month after completion of each quarter.
2. **Independent Testing Procedures**: Internal Audit Department shall perform the following duties:

- Internal Audit Department shall examine the Self Assessment Reports received from branches and shall inspect instantly any branch where any risky area has been identified. Audit Department shall report the same to the senior management of the Bank.
- As a part of its own natural branch audit/inspection program/schedule, Audit Department shall check the anti-money laundering performance of the branch at the time of performing branch audit/inspection program. Internal Audit Department shall include a separate Chapter on Anti-Money Laundering in its Branch Audit Report on the basis of Independent Testing Procedures Checklist attached in the AML Circular No.15/08 dated 24/03/2008. A copy of the anti-money laundering chapter of the inspection report shall be submitted to the Anti-Money Laundering Cell on a Quarterly basis.

Anti-Money Laundering Cell shall perform the following duties:

- Anti-Money Laundering Cell shall examine the Self Assessment Reports received from branches, prepare an overall Assessment Report and submit it to the CEO & Managing Director with comments and recommendations on a half-yearly basis.
- AML Cell shall prepare a checklist based Assessment Report of the branches inspected in a quarter on the basis of inspection reports submitted by Internal Audit Department after inspecting branches. Such report should be submitted to the CEO & Managing Director with comments and recommendations. Comments also should be added taking into consideration the Self Assessment Reports submitted by the branches inspected.
- Anti-Money Laundering Cell shall submit a report on the above to the Bangladesh Financial Intelligence Unit of Bangladesh Bank, Head Office, Dhaka on a half-yearly basis within 60 days after completion of the concerned half year.
- After reviewing the Independent Testing Reports received from Audit Department, AML Cell of HO shall conduct special inspection in those branches which is rated Unsatisfactory & Marginal. AML Cell of HO shall also take necessary measures to improve the compliance standard of those branches and report the same to the senior management of the Bank.

### 3.8 KEEPING OF RECORDS

1. **Statutory Requirements**: Section 25(1)(Ka) of the Money Laundering Prevention Act-2012 requires us to retain correct and full information used to identify customers during their account relationships. Section 25(1)(Kha) of the Act requires us to retain transaction related records for at least 5 (Five) years after termination of relationships with the customers. The records prepared and maintained by Branches and Head Office on its customer relationships and transactions should be such that:

- requirements of legislation and Bangladesh Bank directives are fully met;
- competent third parties will be able to assess the Bank's observance of money laundering policies and procedures;
- any customer can be properly identified and located;
- all suspicious activity reports received internally and those made to Bangladesh Bank can be identified; and
- the Bank can satisfy within a reasonable time any enquiries or court orders from the appropriate authorities as to disclosure of information.

2. **Documents Verifying Evidence of Identity and Transaction Records**: Records relating to verification of identity will generally comprise:
   - a description of the nature of all the evidences received relating to the identity of the verification subject;
   - the evidence itself or a copy of it or, if that is not readily available, information reasonably sufficient to obtain such a copy.

Records relating to transactions will generally comprise:
- details of personal identity, including the names and addresses, etc. as prescribed by Bangladesh Bank under M.L.P. Circular No. 02 dated 17-07-2002 and subsequent directives pertaining to:
  1) the customer;
  2) the beneficial owner of the account or product;
  3) the non-account holder conducting any significant one-off transaction;
  4) any counter-party;

- details of transaction including:
  1) the nature of such transactions;
  2) customer's instruction(s) and authority;
  3) source(s) and volume of funds;
  4) destination(s) of funds;
  5) book entries;
  6) custody of documentation;
  7) the date of the transaction;
  8) the form (e.g. cash, cheque) in which funds are offered and paid out.

These records of identity must be kept for at least 5 (Five) years from the date when the relationship with the customer has been terminated. This is the date of:
- i. the carrying out of the one-off transaction, or the last transaction in a series of linked one-off transactions; or
- ii. the ending of the business relationship; or
- iii. the commencement of proceedings to recover debts payable on insolvency.

3. **Formats and Retrieval of Records**: Records may be retained in any of the following formats:
   - documents can be retained in their original hard copy form, or
   - the Bank may establish reliable procedures for holding records in electronic form.
Whatever the format may be, all records should be capable of retrieval without undue delay.
Record requirements are the same regardless of the format in which they are kept or whether the transaction was undertaken by paper or electronic means. Documents held centrally must be capable of
- distinguishing between the transactions relating to different customers, and
- identifying where the transaction took place and in what form.

4. **Wire Transfer Transactions**: Investigations of major money laundering cases have shown that criminals make extensive use of telegraphic transfers (TT) and electronic payment and message systems because of the complexity of cross-border investigations. Investigations become more difficult if the identity of the original ordering customer (i.e. purchaser) or the ultimate beneficiary is not clearly shown in a TT and electronic payment message instruction.

In such a situation, all branches must include accurate and meaningful information of the followings on all outgoing funds transfers:
- the originator (name, account number, and where possible address),
- the beneficiary (account name and/or account number) and
- the related messages that are sent.

All these information should remain with the transfer or related message throughout the payment chain.

Records of electronic payments and messages must be kept for at least 5 (Five) years.

5. **Investigations**: The only valid role that a Bank plays in assisting law enforcement agencies, investigating a money laundering case, is a provider of relevant information, particularly where the money launderer has used a complex web of transactions specifically for the purpose of confusing/obscuring the audit trail.

Where Prime Bank Limited has submitted a report of suspicious activity to Bangladesh Bank or where the branch knows that a client or transaction is under investigation, the Branches shall not destroy any relevant records without the agreement of the Bangladesh Bank even though the 5 (Five) years limit is over.

The Branches and Anti-Money Laundering Section at Head Office shall maintain a register or tabular records of all investigations related to anti-money laundering made to it by the Bangladesh Bank and all disclosures to the Bangladesh Bank. The register should contain at a minimum the following details:
- the date and nature of the enquiry;
- details of the account(s) involved; and be maintained for a period of at least 5 years.

6. **Training Records**: Anti-Money Laundering Section & Prime Bank Training Institute will conduct training courses on anti-money laundering and maintain records of the followings:

details of the content of the training programs provided,
- the names of employees who have received the training,
- the date on which the training was imparted,
- the results of any testing carried out to measure employees understanding of the money laundering requirements, and
- an on-going training plan.
Chapter – IV
TRADE BASED MONEY LAUNDERING

4.1 DEFINITION & PROCESS

The process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimize their illicit origins. Trade-based money laundering involves using of the following techniques to disguise the illicit origin of money:
- over- and under-invoicing of goods and services;
- multiple invoicing of goods and services; or
- false description of goods and services.

4.2 RESPONSE OF PRIME BANK LIMITED TO COMBAT TRADE BASED MONEY LAUNDERING

Prime Bank Limited is well-aware of trade based money laundering. Authorized Dealer (AD) branches of Prime Bank Limited are instructed to closely monitor over- and under-invoicing of goods and services. Continuous training courses are arranged on “Trade Based Money Laundering” for the concerned officers working in the Foreign Exchange Desks.

4.3 CORRESPONDENT BANKING

Correspondent banking shall mean providing services which are approved by Bangladesh Bank like credit, deposit, collection, clearing, payment or other similar services by one bank (correspondent) to another bank (respondent).

While establishing and continuing correspondent banking relationship following drill should be observed so that banking system can not be abused for the purpose of money laundering:
- Before providing correspondent banking service senior management approval must be obtained on being satisfied about the nature of the business of the respondent bank through collection of information as per Annexure-1 attached with AML circular No. 24 dated 03/03/2010 issued by Bangladesh Bank.
- Banks should establish or continue a correspondent relationship with a foreign bank only if it is satisfied that the bank is effectively supervised by the relevant authority.
- Banks should not establish or continue a correspondent banking relationship with any shell bank. [Here shell bank refers to such banks as are incorporated in a jurisdiction where it has no branches or activities and which is unaffiliated with a regulated financial group.]
Correspondent banking relationship shall not be established or continued with those respondent banks that established correspondent banking relationship or maintain account with a shell bank.

Bank should pay particular attention when maintaining a correspondent banking relationship with banks incorporated in a jurisdiction that do not meet international standards for the prevention of money laundering (such as the countries and territories enlisted in Financial Action Task Force’s Non-cooperating Countries and Territories list). Enhanced due diligence shall be required in such cases. Detailed information on the beneficial ownership of such banks and extensive information about their policies and procedures to prevent money laundering shall have to be obtained.

Enhanced Due Diligence shall have to be exercised in case of the respondent banks that allow direct use of the correspondent account by their customers to transact business on their behalf (i.e. payable through account)

The instructions described in this circular shall be applicable to the entire existing correspondent banking relationship.

4.4 BRANCHES AND SUBSIDIARIES SITUATED/LOCATED IN FOREIGN JURISDICTION

1. Reporting organizations (in applicable cases) under Money Laundering Prevention Act-2012 and Anti Terrorism Act (Amend)-2012 having branches and subsidiaries abroad shall also comply with the provisions of Money Laundering Prevention Act-2012 and Anti Terrorism Act (Amend)-2012.

2. If branch or a subsidiary located abroad, for any reason fails to comply with the instructions of Money Laundering Prevention Act-2012 and Anti Terrorism Act (Amend)-2012 it shall without any delay report to such cases to Anti Money Laundering Department mentioning the reason of the failure.
5.1 STATUTORY REQUIREMENTS

Section 23(1)(Cha) of the Act requires Bangladesh Bank to provide training and arrange meetings, seminars etc. for the officers and staffs of the reporting organizations or any other organizations or institutions as Bangladesh Bank may consider necessary for the purpose of proper implementation of the Act.

Since Banks themselves have responsibilities under the Act in relation to identification, reporting and retention of records, Prime Bank Limited must ensure that its employees are adequately trained to discharge their responsibilities.

Prime Bank Limited shall take appropriate measures to make its employees aware of:

- Policies and procedures to prevent money laundering and for identification, record keeping and internal reporting;
- Legal requirements; and
- Provide employees with training in recognition and handling of suspicious transactions;

5.2 THE NEED FOR EMPLOYEES AWARENESS

The effectiveness of this Policy depends on the extent to which Prime Bank’s employees appreciate the serious nature of the background against which the legislation has been enacted.

It this context, Prime Bank Limited shall introduce comprehensive measures to ensure that:

- All employees are fully aware of their own responsibilities and statutory obligations;
- All employees are aware that they can be personally liable for failure to report information in accordance with internal procedures.
- All employees are trained in a manner that they co-operate fully and provide prompt reports of any suspicious transaction.

5.3 EDUCATION AND TRAINING PROGRAMS

All relevant employees of the Bank should be educated in “Know Your Customer (KYC)” requirements. The training in this respect should cover:

- the need to know the true identity of the customer; and
- the need to know about the type of business activities expected in relation to that customer at the outset to understand what might constitute a suspicious activity;
Relevant employees should be alert to any change in the pattern of a customer’s transactions or circumstances that might constitute criminal activity.

5.4 NEW EMPLOYEES

All new employees, irrespective of the level of seniority shall be trained on:
- background to money laundering,
- anti-money laundering laws, regulations, circulars and instructions,
- reporting of suspicious transactions,
- reporting of cash transactions, and
- self assessment and independent testing procedures.

5.5 TELLERS/FOREIGN EXCHANGE DEALERS

Members of employees who deal directly with the public are the first point of contact with potential money launderers. So their efforts are vital to the Bank’s anti-money laundering procedures. These employees must be made aware of
- their legal responsibilities,
- factors that may give rise to suspicions, and
- the procedures to be adopted when a transaction is deemed to be suspicious.

It is vital that ‘front-line’ employees are made aware of the Bank’s policy for dealing with non-regular (walk- in) customers particularly where large transactions are involved, and the need for extra vigilance in such cases.

5.6 EMPLOYEES OF FRONT DESK

Members of employees who are in a position to deal with account opening, or to accept new customers, or to receive Pay Order/DD/TT/FDR application forms and cheques for deposit into customer’s account or other investments must receive appropriate training on the processing and verification procedures.

In addition, these employees must understand and be trained on:
- the need to verify the identity of the customer,
- the Bank’s account opening and customer/client verification procedures.

Such employees should be aware that:
- the offer of suspicious funds or the request to undertake a suspicious transaction need to be reported to the Branch Anti-Money Laundering Compliance Officer, whether or not the funds are accepted or the transactions proceeded, and
- must know what procedures to follow in these circumstances.
5.7 BRANCH MANAGERS

Persons responsible for supervising or managing employees should be provided with a higher level of instruction covering all aspects of money laundering procedures.

Such instruction should also highlight the followings:
- the offences and penalties arising from the Act for non-reporting and for assisting money launderers;
- internal reporting procedures, and
- the requirements for verification of identity and the retention of records.

5.8 BRANCH ANTI-MONEY LAUNDERING COMPLIANCE OFFICER (BAMLCO)

BAMLCOs should receive in-depth training on:
- all aspects of the money laundering legislation,
- Bangladesh Bank directives,
- internal policies,
- validation and reporting of suspicious transactions, and
- new trends, techniques and patterns of criminal activity.

5.9 REFRESHERS’ TRAINING

In addition to the above relatively standard requirements, training should be tailored to the needs of specialized areas of the Bank’s business. Contents of training programs should be kept under review and updated when necessary.

To ensure that employees do not forget their responsibilities, Anti-Money Laundering Section and Prime Bank Training Institute should arrange refreshers’ training at regular intervals.
Dear Sir,
I/we hereby request you to open an account in the books of your bank in the name mentioned as under and agree to comply with and abide by the bank's rules in force for the conduct of the account and any amendment there to:

1. **Title of Account**

2. **Type of Account** – please Tick (✓)
   - Savings
   - Current
   - My First Account
   - STD
   - Fixed
   - FC
   - RFCD
   - NFCD

3. **Currency** – please Tick (✓)
   - Taka
   - Dollar
   - Euro
   - GBP
   - Others: __________________________

4. **Operating Instruction** – please Tick (✓)
   - Individual
   - Joint
   - Either or Survivor

5. **Other Accounts of the Customer (If any)***

<table>
<thead>
<tr>
<th>Name of the Bank(s)</th>
<th>Branch(es)</th>
<th>Type of Account – please Tick (✓)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>a)</td>
<td>Deposit A/C</td>
</tr>
<tr>
<td>b)</td>
<td>b)</td>
<td>Deposit A/C</td>
</tr>
<tr>
<td>c)</td>
<td>c)</td>
<td>Deposit A/C</td>
</tr>
</tbody>
</table>

6. **Introducing Information**
   - **Name**
   - **Account Number**
   - **Branch Name**
   - **Signature with date**
   - **Introducer's Signature Verified by**
     - **Name**
     - **Designation**
     - **Signature**
     - **Date**

7. **Initial Deposit**
   - **Currency:**
   - **Amount:**
   - **In words:**
   - **Mode:** Cash ☐ Instrument No. __________________________ date Others (pls. specify)

8. **Information of FDR (if any)**
   - **Amount:**
   - **Period:**
   - **Rate of Interest:**
   - **Currency:**
   - **Date of maturity:** / / 
   - **Renewal, if any**
     - Renew Principal with Interest ☐ Renew only Principal Amount and pay interest in cash ☐ Renew only Principal and deposit Interest in A/C No. ☐ Not Applicable

9. **Information of Scheme Deposit**
   - **Name of Scheme**
   - **Duration**
   - **Single Deposit/Installment**
   - **No. of Installment (yearly)**
   - **Amount on maturity**
   - **Monthly Return**
10. Nominee’s Details:

I/We hereby nominate the following person(s) to receive the entire amount deposited in the above account in the event of my/our death. I/We hereby reserve the right to cancel or change the said nominee at any time. I/We hereby also declare that the bank will not be held responsible for any transaction done as per instruction given by me/us.

<table>
<thead>
<tr>
<th>Nominee’s Name</th>
<th>Date of Birth/Age</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mother’s Name</td>
<td></td>
</tr>
<tr>
<td>Spouse Name</td>
<td></td>
</tr>
<tr>
<td>Mailing Address</td>
<td></td>
</tr>
<tr>
<td>Occupation</td>
<td>Relationship with A/C Holder</td>
</tr>
<tr>
<td>National ID Card No.</td>
<td></td>
</tr>
</tbody>
</table>

NB: If any NRB is nominated and become beneficiary of the Account, the Foreign Exchange Regulation Act will be applicable while remitting the money.

B) In the event, the Nominee who is so authorized above remains a minor at the time of my/our death

Mr./Ms. .........................................................

of .................................................................

is authorized to received/draw the amount of deposit held in my/our account.

Signning Instruction

Specify Mode of Operation

11. In case of Account Holder(s) is/are minor:

As a duly appointed guardian of the account holder, I hereby declare that the account holder is a minor. His/Her necessary information is/are attached herewith. The account will be operated by me until the account holder becomes a major or I furnish further declaration.

<table>
<thead>
<tr>
<th>Account Title (Minor)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Guardian</td>
</tr>
<tr>
<td>Relationship with Minor</td>
</tr>
</tbody>
</table>

(For Minor and Guardian – Two Personal Information Forms are to be filled up and Guardian must sign both the forms)

12. Sources of Found

13. Declaration and Signature:

I/We hereby acknowledge that I/we have read the aforesaid terms & conditions and agreed to abide by the mentioned terms & conditions. I/We solemnly declare that the information mentioned above is correct. I/We shall also submit any type of additional information/documents as and when required.

For Bank’s Use only

Comments (if any):

Account Opening Officer
(With name, designation seal & date)

Signature

Signature by
(With name, designation seal & date)

Signature

Approved by
(With name, designation seal & date)
<table>
<thead>
<tr>
<th><strong>Personal Information</strong></th>
<th><strong>Photograph</strong></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th><strong>Date</strong></th>
<th><strong>A/C No.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>D M Y</td>
<td></td>
</tr>
</tbody>
</table>

1. **Title of Account**  
2. **Involvement with A/C as** – please Tick (✓)  
3. **Father's Name**  
4. **Mother's Name**  
5. **Spouse Name**  
6. **Nationality**  
7. **Date of Birth**  
8. **Gender - please Tick (✓)**  
9. **Occupation with Designation**  
10. **National ID Card No.**  
11. **Passport No. (if any)**  
12. **Tax ID No. (TIN, if any)**  
13. **Driving License No. (if any)**  
14. **Present Address (Residence)**  
15. **Permanent Address**  
16. **Business/ Mailing Address**  
17. **Contact details**  
18. **Credit Card Information**  
19. **Residential Status**  

(NB: For more information, if required, the same may be collected in accordance with 'Guidelines for Foreign Exchange Transactions')

1st Applicant's full Name:  

**Signature**  
**Date:**
# Personal Information

(2nd Applicant)

<table>
<thead>
<tr>
<th>Date</th>
<th>A/C No.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Customer ID Number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Group Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

## 1. Title of Account

|  |  |  |  |  |  |  |  |  |
|---|---|---|---|---|---|---|---|

## 2. Involvement with A/C as – please Tick (✓)

<table>
<thead>
<tr>
<th>1st Applicant</th>
<th>2nd Applicant</th>
<th>3rd Applicant</th>
<th>Director</th>
<th>Partner</th>
<th>Minor</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Guardian</th>
<th>Attorney Holder</th>
<th>Signatories</th>
<th>Others:</th>
</tr>
</thead>
</table>

## 3. Father's Name

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 4. Mother's Name

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 5. Spouse Name

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 6. Nationality

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 7. Date of Birth

|  |  |  |  |  |
|---|---|---|---|

## 8. Gender - please Tick (✓)

<table>
<thead>
<tr>
<th>Male</th>
<th>Female</th>
</tr>
</thead>
</table>

## 9. Occupation with Designation

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>


<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 11. Passport No. (if any)

<table>
<thead>
<tr>
<th>Expiry Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ /</td>
</tr>
</tbody>
</table>

## 12. Tax ID No. (TIN, if any)

<table>
<thead>
<tr>
<th>Expiry Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ /</td>
</tr>
</tbody>
</table>

## 13. Driving License No. (if any)

<table>
<thead>
<tr>
<th>Expiry Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>/ /</td>
</tr>
</tbody>
</table>

## 14. Present Address (Residence)

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

## 15. Permanent Address

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 16. Business/ Mailing Address

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>

## 17. Contact details

<table>
<thead>
<tr>
<th>Tel:</th>
<th>Res.:</th>
<th>Office:</th>
<th>Cell No.:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>E-mail:</th>
<th>Fax:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## 18. Credit Card Information

<table>
<thead>
<tr>
<th>Issuing Organization and Credit Card Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>i)</td>
</tr>
<tr>
<td>ii)</td>
</tr>
</tbody>
</table>

## 19. Residential Status

<table>
<thead>
<tr>
<th>Resident</th>
<th>Non-Resident</th>
</tr>
</thead>
</table>

(NB: For more information, if required, the same may be collected in accordance with 'Guidelines for Foreign Exchange Transactions')

---

2nd Applicant's full Name: ..........................................................

---

Signature

Date:
### Transaction Profile

1. Title of Account

2. Type of Account

3. Account or Reference No.

<table>
<thead>
<tr>
<th>Particulars</th>
<th>No. of Transactions (Monthly)</th>
<th>Maximum Transaction amount (each Transaction)</th>
<th>Total amount (Monthly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Deposit (inclusive of Online Transactions)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transfer/deposit by Instruments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign Remittance Receivable</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Export Revenue Receivable</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others (specify)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Deposit (approx.)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Particulars</th>
<th>No. of Transactions (Monthly)</th>
<th>Maximum Transaction amount (each Transaction)</th>
<th>Total amount (Monthly)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash withdrawal (inclusive of Online Transactions and ATM)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transfer/payment by Instruments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foreign Remittance withdrawal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Settlement of Import expenses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others (specify)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total withdrawal (approx.)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. Sources of Fund

I/We the undersigned hereby acknowledge that the transactions limit is my/our organization's usual transactions. I/We do hereby acknowledge that if necessary, I/We will change/update the transaction profile.

<table>
<thead>
<tr>
<th>Signature</th>
<th>Name</th>
<th>Designation</th>
<th>Date</th>
</tr>
</thead>
</table>
1. Title of Account

2. Type of Account

3. Account or Reference No.

4. Name of A/C Opening Officer

5. Type of Business and sources of Income

6. Describe how the sources of Funds have been verified and comments on the levels/types of amounts of transactions are commensurate with the nature of business

7. Information about Beneficiary Owner of Account
   (in case of Company, details information of regulatory Shareholder and 20% or above single shareholder)

8. Passport Number

9. Voter ID Card Number

10. National ID Number

11. TIN

12. VAT Registration Number

13. Driving License Number

14. In case of non-resident & Foreigner
   a) Reasons for opening the Account
   b) Type of Visa

15. What does the customer do?

<table>
<thead>
<tr>
<th>Sl.</th>
<th>Category/Nature of business</th>
<th>Risk Level</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>Jewellery/Gems Trade</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>02</td>
<td>Money Exchange/Courier Service Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>03</td>
<td>Real Estate Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>04</td>
<td>Construction Project Promoter</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>05</td>
<td>Offshore Corporation</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>06</td>
<td>Art/Antique Dealers</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>07</td>
<td>Restaurant/Bar/Night Club/Hotel &amp; Motel owner</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>08</td>
<td>Import/Export Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>09</td>
<td>Investor (monthly Tk. 25.00 lac)</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>10</td>
<td>Share Stock Broker</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>11</td>
<td>Manpower Export Business</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>12</td>
<td>Operations in Multiple Locations</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>13</td>
<td>Film Producer/Distributor</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>14</td>
<td>Arms Dealer</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>15</td>
<td>Mobile Phone Operator</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>16</td>
<td>Investor (more than Tk. 1.00 crore/annum)</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>17</td>
<td>Travel Agent</td>
<td>High</td>
<td>4</td>
</tr>
<tr>
<td>Sl.</td>
<td>Category/Nature of business</td>
<td>Risk Level</td>
<td>Score</td>
</tr>
<tr>
<td>-----</td>
<td>----------------------------------------------------------------------------------------------</td>
<td>------------</td>
<td>-------</td>
</tr>
<tr>
<td>18.</td>
<td>Transport Operator</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>19.</td>
<td>Auto Dealer (Reconditioned Cars)</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>20.</td>
<td>Non-banking financial Institution (NBFI)</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>21.</td>
<td>Freight/Shipping/Cargo Agent</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>22.</td>
<td>Insurance/Brokerage Agent</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>23.</td>
<td>Religion Institute/Organization</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>24.</td>
<td>Entertainment Organization/Amusement Park</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>25.</td>
<td>Motor Parts Business</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>26.</td>
<td>Tobacco &amp; Cigarette Business</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>27.</td>
<td>Auto Primary (New Car)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>28.</td>
<td>Shop Owner (Retail)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>29.</td>
<td>Business - Agent</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>30.</td>
<td>Small Trader (Turnover less than Tk. 50.00 lac per annum)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>31.</td>
<td>Self Employed Professional</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>32.</td>
<td>Corporate Customer</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>33.</td>
<td>Construction Material Business</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>34.</td>
<td>Computer/Mobile Phone Dealer</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>35.</td>
<td>Software Business</td>
<td>Low</td>
<td>1</td>
</tr>
<tr>
<td>36.</td>
<td>Manufactures (other than Arms)</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>37.</td>
<td>Retired from Service</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>38.</td>
<td>Service</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>39.</td>
<td>Student</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>40.</td>
<td>Housewife</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>41.</td>
<td>Farmer</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>42.</td>
<td>Others .................................................................................................................................</td>
<td>Low</td>
<td>0</td>
</tr>
</tbody>
</table>

For table 16 to 21 inclusive class limit will be followed. Example: 50 lac will be within 0 – 50 class

16. Net worth of the Customer

<table>
<thead>
<tr>
<th>Amount (Taka)</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 50 lac</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>50 lac to 2 crore</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 2 Crore</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

17. The account was opened in which way

<table>
<thead>
<tr>
<th>Amount (Taka)</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship Manager/Branch</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>Direct Sales Agent</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Internet</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
<tr>
<td>Walk-in/Willingness</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

18. Expected monthly Transactions

<table>
<thead>
<tr>
<th>Transactions in Current Account (figure in Lac)</th>
<th>Transactions in Saving Account (figure in Lac)</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 10</td>
<td>1 – 5</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>10 – 50</td>
<td>5 – 20</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 50</td>
<td>Above 20</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

19. Expected number of monthly Transactions

<table>
<thead>
<tr>
<th>No. of transactions in Current Account</th>
<th>No. of transactions in Savings Account</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 100</td>
<td>0 – 20</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>100 – 250</td>
<td>20 – 50</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 250</td>
<td>Above 50</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>
20. Expected monthly Cash Transactions

<table>
<thead>
<tr>
<th>Transactions in Current Account (amount in Lac)</th>
<th>Transactions in Saving Account (amount in Lac)</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 10</td>
<td>1 – 2</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>10 – 25</td>
<td>2 – 7</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 25</td>
<td>Above 7</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

21. Expected number of monthly Cash Transactions

<table>
<thead>
<tr>
<th>No. of transactions in Current Account</th>
<th>No. of transactions in Savings Account</th>
<th>√</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 15</td>
<td>0 – 5</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>15 – 30</td>
<td>5 – 10</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 30</td>
<td>Above 10</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

22. Overall Risk Assessment

<table>
<thead>
<tr>
<th>Total Risk Rating</th>
<th>√</th>
<th>Risk Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Above/Equal 14</td>
<td></td>
<td>High</td>
</tr>
<tr>
<td>Below 14</td>
<td></td>
<td>Low</td>
</tr>
</tbody>
</table>

Comments (if any)

(* Customer may be assessed as high risk according to subjective cause when the risk grading is below 14 also, in that case the reasons must be specified)

23. Address(es) of Account Holder(s) verified or not?

[ ] Yes [ ] No

24. If yes, How the address(es) is verified

25. Political Exposed Person(s) (PEPs) : (According ti A.M.I.L. Circular – 14)

a) Approval obtained from Senior Management

[ ] Yes [ ] No

b) Sources of Wealth

[ ] Yes [ ] No

c) Customer(s) interviewed personally

[ ] Yes [ ] No

26. When the account related information is reviewed and updated finally

Date

Compliance Officer

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation</th>
<th>Signature and date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
1) Account opening requirements: Account Opening Form to be filled in and signed by each account holder. Latest passport size photograph (2 copies) for each account holder attested by the introducer, copy of passport / voter identity card. Introduction of account holder to be signed by introducer with account number, 1 (one) copy of nominee's photograph (attested by the account holder) and signature of the nominee. Minor accounts additionally require - copy of the birth certificate and photograph. Foreign citizens in Bangladesh additionally require - photocopy of passport with valid visa and work permit.

2) Eligibility for opening the account: An adult individual having sound mind can open a Saving Bank Account singly or jointly. Guardian can open minor account. But a minor of 12 years of age can open SB A/C in his name provided he can understand, read and write independently. Any club, Society and similar organization also eligible to open SB A/C providing Bye-Laws/Resolution/Articles of Association acceptable to the Bank. An illiterate person can open SB A/C as per applicable Laws of the Bank by left hand thumb impression and physical attendance. An adult individual having sound mind can open a Current/STD Account singly, jointly or in the name of an organization. Club, Association, Organization or Institution can open Current Account providing Byelaws and Articles of Association acceptable to the Bank.

3) Initial deposit and minimum balance: The initial minimum deposit of Tk. 1,000/- is required to open the Savings Bank Deposit Account and Tk. 5,000/- is required to open the Current Deposit Account, and shall have to maintain minimum balance of Tk. 500/- in case of SB A/C and Tk. 2,000/- in case of CD A/C. Tk. 25,000/- is required as the initial amount for opening the Short Term Deposit Account and shall have to maintain the minimum balance of Tk. 25,000/- in the STD A/C.

4) Deposits, withdrawals: A depositor can withdraw from his Savings Bank Deposit account twice in a week. 25% of his balance or Tk. 25,000/- whichever is lower. If any depositor wants to withdraw more than 25% of the balance or more than Tk. 25,000/-, 7 days notice is required to be served to the Bank for information, otherwise the customer will not be entitled to interest for that month. If any depositor repeatedly withdraws more than 25% of the balance or more than Tk. 25,000/- or more than twice in a week, service charge as applicable for Current Account will be applicable to that SB account. A depositor can deposit and withdraw from the Current Account as many times as required and Cheques, Drafts, Pay Orders are to be crossed at the time of deposit. The Bank acts only as the collecting agent and assumes no responsibility for the realization of any items deposited with the Bank for collection. Thus, proceeds of cheques or other instruments deposited are not available for withdrawal until collected by the Bank. Balance in Short Term Deposit (STD) will bear interest as applicable from time to time. For withdrawal of any amount from the STD Account 7 (seven)/30 (thirty) days notice, as per option will be required. Otherwise, interest for the month will be forfeited.

5) Identification of the account: Each account will be given one account number. This number is to be properly quoted for each deposit and for any correspondence to the Bank. The Bank will not be responsible for any loss or damage occurring as a result of wrong quotation of account number.

6) Issue and safety of cheques: Cheques will only be issued to a customer when all documentation considered necessary by the Bank has been obtained. It is the responsibility of the account holder to ensure cheques in their possession are kept safely. The customer must allow time exercise due care to prevent cheques, payment orders and other order or instruments from being altered or forged in a manner which may facilitate fraud. In such events, the Bank is not responsible for any loss suffered by the customer or any other person. Any loss or misuse of the cheques or other instruments must be immediately reported to the Bank and confirmed in writing without any delay. Chequebook and other securities will be valid if signed by authorized officials.

7) Signing of cheque: Cheque leaf is to be signed by the account holder/account operator as per specimen signature recorded with the Bank and any alteration and cutting should be confirmed by full signature. No cheque will be honored if the same is post dated, anti-dated or mutilated. Bank reserves the right to impose fine for bounce of cheque for insufficient fund in the account.

8) Orders to stop payment or amend instruction: A customer may place a stop payment order for a cheque in writing. The Bank will not make the payment if it has reasonable opportunity to act on such order.

9) Bank's right: Bank reserves the right to enquire the customer for source of fund as per Anti-Money Laundering Act-2009 and ask for nominee as per Bank Companies Act-1991. Bank reserves the right to close any account if found unsatisfactory or may decline to issue fresh chequebook without assigning any reason. Bank reserves the right to realize charges from any account as per prevailing norms of the. Bank is authorized to realize excise duty, income tax etc. as per government instruction. The Bank reserves the right to debit any account that may have been inadvertently credited with an item subsequently unpaid on collection. I/we have gone through the terms and conditions mentioned above and understood them in entirety and undertake to abide by those terms and conditions relating to the account. I/we also agree to be bound by such terms & conditions as may be amended or supplemented from time to time.

Signature of the Applicant

Signature of the Applicant

Signature of the Applicant
The following papers/documents are required:

1) Two copies of passport size photograph of the account holder (s) / person(s) who will operate the A/C duly attested by the introducer.

2) A/C to be introduced by current / savings account holder.

3) Photocopy of valid passport (1 to 7 page) / driving license / National ID card / employer's certificate / nationality certificate issued by the ward commissioner or chairman etc.

4) Paper related to sources of income

5) One copy passport size photograph of nominee. (Attested by account holder)

6) TIN Certificate (if applicable)
Dear Sir,

I/We hereby request you to open an account in the books of your bank in the name mentioned as under and agree to comply with and abide by the bank’s rules in force for the conduct of the account and any amendment there to:

1. Title of Account

2. Type of Organization – please Tick (✓)
   - Private Ltd.
   - Public Ltd.
   - Partnership
   - NGO
   - Club
   - Society
   - Others (specify)

3. Type of Account – please Tick (✓)
   - Savings
   - Current
   - STD
   - Fixed
   - FC
   - Others

4. Currency – please Tick (✓)
   - Taka
   - Dollar
   - Euro
   - GBP
   - Others

5. Address of Organization
   i) Registered Address
   ii) Business/Office Address
   iii) Factory/Industry Address

6. Trade License No.

7. Registration Authority & Country
   (for both Local & Foreign)

8. Registration No.

9. Tax ID Number (TIN No.)

10. VAT Registration No. (if any)

11. Nature of Business (in detail)

12. Other Accounts of the Customer (if any)

<table>
<thead>
<tr>
<th>Name of the Bank(s)</th>
<th>Branch(es)</th>
<th>Type of Account – please Tick (✓)</th>
</tr>
</thead>
<tbody>
<tr>
<td>a)</td>
<td>a)</td>
<td>Deposit A/C</td>
</tr>
<tr>
<td>b)</td>
<td>b)</td>
<td>Deposit A/C</td>
</tr>
<tr>
<td>c)</td>
<td>c)</td>
<td>Deposit A/C</td>
</tr>
</tbody>
</table>
13. Introducer's details

<table>
<thead>
<tr>
<th>Name</th>
<th>Signature with date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Account Number</th>
<th>Branch Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Introducer's Signature Verified by

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation</th>
<th>Signature with date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

14. Initial Deposit

<table>
<thead>
<tr>
<th>In words:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

15. Information of FDR (if any)

<table>
<thead>
<tr>
<th>Amount:</th>
<th>Currency:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Period:</th>
<th>Rate of Interest:</th>
<th>Date of maturity:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>/ /</td>
</tr>
</tbody>
</table>

Renewal instruction

- Renew Principal with Interest
- Renew only Principal Amount and pay interest in cash
- Renew only Principal and deposit Interest in A/C No.
- Not Applicable

16. Information of Scheme Deposit

<table>
<thead>
<tr>
<th>Name of Scheme</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tenure</th>
<th>Single Deposit/Installment</th>
<th>No. of Installment (yearly)</th>
<th>Amount on maturity</th>
<th>Monthly Return</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

17. Sources of Fund

18. Declaration and Signature:

I/We hereby acknowledge that, I/we have read the aforesaid terms & conditions and agreed to abide by the mentioned terms & conditions. I/We solemnly declare that the information mentioned above is/are correct. I shall also submit any type of additional information/documents, if required.

Signing Instruction
Specify Mode of Operation

### Applicants' Name, Designation and Signature with Date

<table>
<thead>
<tr>
<th>Particulars</th>
<th>Name</th>
<th>Designation</th>
<th>Signature with Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2nd Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3rd Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4th Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### For Bank's Use only

Comments (if any)

<table>
<thead>
<tr>
<th>Signature</th>
<th>Account Opening Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(With name, designation seal &amp; date)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Signature Admitted by</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(With name, designation seal &amp; date)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature</th>
<th>Approved by</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(With name, designation seal &amp; date)</td>
</tr>
</tbody>
</table>
## Personal Information

<table>
<thead>
<tr>
<th>Date D D M M Y Y Y</th>
<th>A/C No.</th>
<th>Customer ID Number</th>
<th>Group Code</th>
</tr>
</thead>
</table>

1. **Title of Account**:  

1st Applicant’s full Name:

2. Involvement with A/C as – please Tick (✓)  
   - 1st Applicant  
   - 2nd Applicant  
   - 3rd Applicant  
   - Director  
   - Partner  
   - Minor  
   - Guardian  
   - Attorney Holder  
   - Signatories  
   - Others: ________________

3. Father’s Name

4. Mother’s Name

5. Spouse Name

6. Nationality

7. Date of Birth

8. Gender – please Tick (✓)  
   - Male  
   - Female

9. Occupation with Designation


11. Passport No. (if any)  
    Expiry Date / / 

12. Tax ID No. (TIN, if any)

13. Driving License No. (if any)  
    Expiry Date / / 

14. Present Address (Residence)

15. Permanent Address

16. Business/ Mailing Address

17. Contact details  
   - Telephone:  
   - Res.:  
   - Office:  
   - Cell No.:  
   - i) E-mail:  
   - Fax:  

18. Credit Card Information  
   Issuing Organization and Credit Card Number

19. Residence Status  
   - Resident  
   - Non-Resident

(NB: For more information, if required, the same may be collected in accordance with ‘Guidelines for Foreign Exchange Transactions’)
# Personal Information

1. **Title of Account**

2. **2nd Applicant's full Name**

3. **Father's Name**

4. **Mother's Name**

5. **Spouse Name**

6. **Nationality**

7. **Date of Birth**

8. **Gender - please Tick (✓)**
   - Male
   - Female

9. **Occupation with Designation**

10. **National ID Card No.**

11. **Passport No. (if any)**
    - Expiry Date

12. **Tax ID No. (TIN, if any)**

13. **Driving License No. (if any)**
    - Expiry Date

14. **Present Address (Residence)**

15. **Permanent Address**

16. **Business/ Mailing Address**

17. **Contact details**
   - **Telephone:**
   - **Res.:**
   - **Office :**
   - **Cell No. :**
   - **i) E-mail:**
   - **Fax :**

18. **Credit Card Information**
   - **Issuing Organization and Credit Card Number**

19. **Residence Status**
   - [ ] Resident
   - [ ] Non-Resident

( NB: For more information, if required, the same may be collected in accordance with 'Guidelines for Foreign Exchange Transactions')

---

**Signature**

**Date:**

1. Title of Account

2. Type of Account

3. Account or Reference No.

<table>
<thead>
<tr>
<th>Deposits</th>
<th>Particulars</th>
<th>No. of Transactions (Monthly)</th>
<th>Maximum Transaction amount (each Transaction)</th>
<th>Total amount (Monthly)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cash Deposit (inclusive of Online Transactions)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transfer/deposit by Instruments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Foreign Remittance Receivable</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Export Revenue Receivable</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Others (specify)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total Deposit (approx.)

<table>
<thead>
<tr>
<th>Withdrawal</th>
<th>Particulars</th>
<th>No. of Transactions (Monthly)</th>
<th>Maximum Transaction amount (each Transaction)</th>
<th>Total amount (Monthly)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cash withdrawal (inclusive of Online Transactions and ATM)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transfer/payment by Instruments</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Foreign Remittance withdrawal</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Settlement of Import expenses</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Others (specify)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total withdrawal (approx.)

4. Sources of Fund

I/We the undersigned hereby acknowledge that the transactions limit is my/our organization’s usual transactions. I/We do hereby acknowledge that if necessary, I/we will change/update the transaction profile.

<table>
<thead>
<tr>
<th>Particulars</th>
<th>Name</th>
<th>Designation</th>
<th>Signature with Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2nd Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3rd Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4th Applicant</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Prime Bank Limited**

KYC Profile Form
For Personal & Non-personal/Corporate Account Only

1. Title of Account

2. Type of Account

3. Account or Reference No.

4. Name of A/C Opening Officer

5. Type of Business and sources of Income

6. Describe how the sources of Funds have been verified and comments on the levels/types of amounts of transactions are commensurate with the nature of business.

7. Information about Beneficiary Owner of Account
   (in case of Company, details information of regulatory Shareholder and 20% or above single shareholder)

8. Passport Number

9. Voter ID Card Number

10. National ID Number

11. TIN

12. VAT Registration Number

13. Driving License Number

14. In case of non-resident & Foreigner
   a) Reasons for opening the Account
   b) Type of Visa

15. What does the customer do?

<table>
<thead>
<tr>
<th>Sl.</th>
<th>Category/Nature of business</th>
<th>Risk Level</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>01.</td>
<td>Jewellery/Gems Trade</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>02.</td>
<td>Money Exchange/Courier Service Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>03.</td>
<td>Real Estate Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>04.</td>
<td>Construction Project Promoter</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>05.</td>
<td>Offshore Corporation</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>06.</td>
<td>Art/Antique Dealers</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>07.</td>
<td>Restaurant/Bar/Night Club/Hotel &amp; Motel owner</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>08.</td>
<td>Import/Export Agent</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>09.</td>
<td>Investor (monthly Tk.25.00 lac)</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>10.</td>
<td>Share Stock Broker</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>11.</td>
<td>Manpower Export Business</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>12.</td>
<td>Operations in Multiple Locations</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>13.</td>
<td>Film Producer/Distributor</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>14.</td>
<td>Arms Dealer</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>15.</td>
<td>Mobile Phone Operator</td>
<td>High</td>
<td>5</td>
</tr>
<tr>
<td>16.</td>
<td>Investor (more than Tk.1.00 crore/annum)</td>
<td>High</td>
<td>4</td>
</tr>
<tr>
<td>17.</td>
<td>Travel Agent</td>
<td>High</td>
<td>4</td>
</tr>
<tr>
<td>Sl.</td>
<td>Category/Nature of business</td>
<td>Risk Level</td>
<td>Score</td>
</tr>
<tr>
<td>-----</td>
<td>-----------------------------------------------------------------</td>
<td>------------</td>
<td>-------</td>
</tr>
<tr>
<td>18.</td>
<td>Transport Operator</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>19.</td>
<td>Auto Dealer (Reconditioned Cars)</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>20.</td>
<td>Non-banking financial Institution (NBFI)</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>21.</td>
<td>Freight/Shipping/Cargo Agent</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>22.</td>
<td>Insurance/Brokerage Agent</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>23.</td>
<td>Religion Institute/Organization</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>24.</td>
<td>Entertainment Organization/Amusement Park</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>25.</td>
<td>Motor Parts Business</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>26.</td>
<td>Tobacco &amp; Cigarette Business</td>
<td>Medium</td>
<td>3</td>
</tr>
<tr>
<td>27.</td>
<td>Auto Primary (New Car)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>28.</td>
<td>Shop Owner (Retail)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>29.</td>
<td>Business – Agent</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>30.</td>
<td>Small Trader (Turnover less than Tk.50,00 lac per annum)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>31.</td>
<td>Self Employed Professional</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>32.</td>
<td>Corporate Customer</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>33.</td>
<td>Construction Material Business</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>34.</td>
<td>Computer/ Mobile Phone Dealer</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>35.</td>
<td>Software Business</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>36.</td>
<td>Manufactures (other than Arms)</td>
<td>Low</td>
<td>2</td>
</tr>
<tr>
<td>37.</td>
<td>Retired from Service</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>38.</td>
<td>Service</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>39.</td>
<td>Student</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>40.</td>
<td>Housewife</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>41.</td>
<td>Farmer</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>42.</td>
<td>Others ..............................................................................</td>
<td>(Bank will rate the risk according to nature)</td>
<td></td>
</tr>
</tbody>
</table>

For table 16 to 21 inclusive class limit will be followed. Example: 50 lac will be within 0 – 50 class

16. Net worth of the Customer

<table>
<thead>
<tr>
<th>Amount (Taka)</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 50 lac</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>50 lac to 2 crore</td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 2 Crore</td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

17. The account was opened in which way

<table>
<thead>
<tr>
<th>Amount (Taka)</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship Manager/Branch</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>Direct Sales Agent</td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Internet</td>
<td>High</td>
<td>3</td>
</tr>
<tr>
<td>Walk-in/Willingness</td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

18. Expected monthly Transactions

<table>
<thead>
<tr>
<th>Transactions in Current Account (figure in Lac)</th>
<th>Transactions in Savings Account (figure in Lac)</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 – 10</td>
<td>1 – 5</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>10 – 50</td>
<td>5 – 20</td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 50</td>
<td>Above 20</td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

19. Expected number of monthly Transactions

<table>
<thead>
<tr>
<th>No. of transactions in Current Account</th>
<th>No. of transactions in Savings Account</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 – 100</td>
<td>0 – 20</td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>100 – 250</td>
<td>20 – 50</td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 250</td>
<td>Above 50</td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>
20. Expected monthly Cash Transactions

<table>
<thead>
<tr>
<th>Transactions in Current Account (amount in Lac)</th>
<th>Transactions in Savings Account (amount in Lac)</th>
<th>✓</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 - 10</td>
<td>1 - 2</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>10 - 25</td>
<td>2 - 7</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 25</td>
<td>Above 7</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

21. Expected number of monthly Cash Transactions

<table>
<thead>
<tr>
<th>No. of transactions in Current Account</th>
<th>No. of transactions in Savings Account</th>
<th>✓</th>
<th>Risk Level</th>
<th>Risk Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 - 15</td>
<td>0 - 5</td>
<td></td>
<td>Low</td>
<td>0</td>
</tr>
<tr>
<td>15 - 30</td>
<td>5 - 10</td>
<td></td>
<td>Medium</td>
<td>1</td>
</tr>
<tr>
<td>Above 30</td>
<td>Above 10</td>
<td></td>
<td>High</td>
<td>3</td>
</tr>
</tbody>
</table>

22. Overall Risk Assessment

<table>
<thead>
<tr>
<th>Total Risk Rating</th>
<th>✓</th>
<th>Risk Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Above/Equal 14</td>
<td></td>
<td>High</td>
</tr>
<tr>
<td>Below 14</td>
<td></td>
<td>Low</td>
</tr>
</tbody>
</table>

Comments (if any)

(* Customer may be assessed as high risk according to subjective cause when the risk grading is below 14 also, in that case the reasons must be specified)

23. Address(es) of Account Holder(s) verified or not? □ Yes □ No

24. If yes, How the address(es) is verified

25. Political Exposed Person(s) (PEPs) : (According to A.M.L. Circular – 14)

   a) Approval obtained from Senior Management □ Yes □ No

   b) Sources of Wealth

   c) Customer(s) interviewed personally □ Yes □ No

Prepared by
(Account Opening Officer/Relationship Manager)

<table>
<thead>
<tr>
<th>Signature with date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
</tr>
<tr>
<td>Name Seal</td>
</tr>
</tbody>
</table>

Verified by
(Head of Branch/Operation Manager)

<table>
<thead>
<tr>
<th>Signature with date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
</tr>
<tr>
<td>Name Seal</td>
</tr>
</tbody>
</table>

26. When the account related information is reviewed and updated finally

Date

Compliance Officer

<table>
<thead>
<tr>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Designation</th>
<th>Signature and date</th>
</tr>
</thead>
</table>
1. **Governing Law, Regulations and Rules:** These terms and conditions shall apply to such accounts and services as offered by the bank to its customers, existing or new, from time to time. The terms and conditions herein shall be governed by the laws, rules and regulations of the Central Bank of Bangladesh, Government of Bangladesh and the Bank's policies and practices.

2. **Acceptance of Rules:** Any Person opening the account shall be deemed to have read, understood and accept the terms and conditions herein governing the account.

3. **Information about Customers:** It is the Bank's policy that it will offer high quality services to customers but not to customers who are engaged in illegal activities and activities that are harmful to the welfare of the people of the country. It is therefore necessary for the Bank to obtain information about its customers that are true and correct. The customer agrees to provide the Bank such information, particulars and documents as the Bank may require from time to time in connection with the customer's financial condition, background and dealings with the Bank and businesses. All information, particulars and documents that the customer provides are true, correct and complete and that if there are any changes to the information provided, the customer will immediately inform the Bank in writing. The customer authorizes the Bank to obtain any information that the Bank considers necessary from other banks, organizations and sources that provide information relative to the customer's financial conditions. It is the Bank's policy to maintain confidentiality of customer information. However, the laws and regulations in Bangladesh may require disclosure of customer information to Government organizations and/or regulatory organizations such as the Bangladesh Bank. The Bank may also consider sharing customer information in a way that it considers most suitable with other organizations to improve banking services. The customer authorizes the Bank to disclose or share information at the sole discretion of the Bank and indemnifies the Bank from any accidental disclosure of information during the process of printing, transportation and filing of information.

4. **Initial deposit and minimum balance:** The initial minimum deposit of Tk. 1,000/- is required to open the Savings Bank Deposit Account and Tk.5,000/- is required to open the Current Deposit Account, and shall have to maintain minimum balance of Tk.500/- in case of SB A/C and Tk.2,000/- in case of CD A/C. Tk.25,000/- is required as the initial amount for opening the Short Term Deposit Account and shall have to maintain the minimum balance of Tk.25,000/- in the STD A/C.

5. **Deposits, withdrawals:** A depositor can withdraw from his Savings Bank Deposit account twice in a week, 25% of his balance or Tk. 25,000/- whichever is lower. If any depositor wants to withdraw more than 25% of the balance or more than Tk. 25,000/-, 7 days notice is required to be served to the Bank for information, otherwise the customer will not be entitled to interest for that month. If any depositor repeatedly withdraws more than 25% of the balance or more than Tk. 25,000/- or more than twice in a week, service charge as applicable for Current Account will be applicable to that SB account. A depositor can deposit and withdraw from the Current Account as many times as required and Cheque, Drafts, Pay Orders are to be crossed at the time of deposit. The Bank acts only as the collecting agent and assumes no responsibility for the realization of any items deposited with the Bank for collection. Thus, proceeds of cheques or other instruments deposited are not available for withdrawal until collected by the Bank. Balance in Short Term Deposit (STD) will bear interest as applicable from time to time. For withdrawal of any amount from the STD Account 7 (seven)/30 (thirty) days notice, as per option will be required. Otherwise, interest for the month will be forfeited.

6. **Fees:** The Bank shall be entitled without notice to levy or impose all customary banking and other charges and expenses (including collection fees and legal expenses) in respect of any account or in respect of any other banking facilities provided to the customer by the Bank and to debit the relevant account(s) in accordance with the Bank's normal banking procedures. Such charges are not refundable upon termination of any or all of a customer's account(s).

7. **Credits to the Account:** The Bank acts only as the collection agent and assumes no responsibility for the realization of any items deposited with the Bank for collection. Thus, proceeds of cheques or other instruments deposited are not available for withdrawal until collected by the Bank. The Bank reserves the right to debit any account that may have been inadvertently credited with an item subsequently unpaid on collection.

8. **Withdrawals from STD A/C:** Deposit in Short Notice Term Deposit (STD) will bear interest as applicable from time to time. For withdrawal of any amount from the STD Account 7 (seven)/30 (thirty) days notice, as per option will be required. Otherwise, interest for the month will be forfeited.

9. **Issue and Safety of Cheques:** Cheques will only be issued to a customer when all documentation considered necessary by the Bank has been obtained. It is the responsibility of the account holder to ensure cheques in their possession are kept safely. The customer must at all time exercise due care to prevent cheques, payment orders and other order or instruments...
10. **Changes of Terms and Conditions**: The Bank may at any time as it deems necessary add/ amend/delete the present terms and conditions. The Bank may give notice of such changes where it considers appropriate to the account holder(s) by ordinary mail.

11. **Closure of Accounts**: The Bank reserves the right to close any account or related service without giving prior notice if the conduct of the account is unsatisfactory in the opinion of the Bank or for any other reason(s) whatsoever. The Bank shall pay the customer all available and finally collected balances after all dues to the Bank have been recovered//realized at the time of the closure of the account.

12. **Minimum Balance and Interest Payment**: The minimum average monthly balance as prescribed by the Bank from time to time is required to be maintained in Current and STD accounts. The Bank reserves the right to change the minimum balance requirement. If the balance falls below the required minimum for a period, the Bank may not credit any interest for the period.

13. **Periodic Statement and Advice**: The customer may be provided account statements (a "statement") monthly, half yearly, or yearly. The customer is required to promptly notify the Bank of the failure to receive an expected Statement or Advice. If the account holder does not bring the errors, discrepancies or irregularities to the notice of the Bank in writing within fifteen(15) calendar days after the mailing of the Statement/Advice, it will be construed that the transaction shown in the account Statement/Advice are correct and complete.

14. **Deposits, Withdrawals and Banking Facilities**: The Bank shall meet its obligations exclusively at the branch office where the account is maintained by the customer. When appropriate telecommunication is possible, deposits or withdrawals of monies may be made at any of the Bank's Branches in Bangladesh subject to the terms and conditions of the Bank. The Customer shall ensure that there are sufficient funds (or pre-arranged credits) for the Bank to honor cheques presented to the Bank or for debits to the account in accordance with instructions made by the customer for his/her account provided always that the bank may, at its sole discretion carry out the instruction notwithstanding such inadequacy and may do so without seeking prior approval from or notice to the customer and the customer shall be responsible to repay the resulting overdraft, advance or credit thereby created and for all related charges.

15. **Suspicious Transactions**: The Bank may refuse to process any transaction on any account of the customer if the Bank, in its sole discretion suspects fraud or illegality therein. The decision of the Bank with regards to whether a transaction is or is likely to be involving a fraud or illegality or irregularity shall be final and conclusive and binding on the customer.

16. **Instruments Deposited**: The Bank will not accept stale or post-dated instruments for deposit. The Bank may refuse to accept an instrument payable to "cash" if the instrument is not payable to "bearer". The Bank will refuse to accept an instrument for deposit if the payee's name is not identical to the name of the customer in the Bank's records.

17. **Orders to Stop Payment or Amend Instruction**: A customer may place a stop payment order for a cheque in writing. The Bank will not make the payment if it has reasonable opportunity to act on such order.

18. **Service Disruption**: The customer agrees that the Bank will not be liable for any loss or any damage if it is unable to provide services in connection with any customer accounts due to postal, courier, electrical, mechanical, telecommunication or computer failure or an act of God, catastrophe, war, civil or industrial disturbance.

19. **No Liability for Loss**: The customer agrees that the Bank will not be liable for any loss, damage or liability incurred by the customer in connection with any of its accounts with or services provided or agreed to be provided by the Bank or inaction on part of the Bank or any of its officers, agents, employees and representatives. The customer agrees not to hold the Bank liable for any loss or damage arising from: (A) non-discovery of any forgeries or frauds, except to the extent that the Bank has acted with gross negligence, (B) the Bank closing the customers account for whatever reason whatsoever, (C) directly or indirectly, the error, failure, negligence, act or omission or any other, person, system, institution or payment infrastructure.

20. **Indemnity**: The customer shall keep the Bank indemnified at all times against all loss, costs, damages, expenses (including legal fees), claims or demands arising in any way in connection with the customer's account or in enforcing these terms and conditions and in recovering of any amount due to the Bank or incurred by the Bank in any legal proceedings of whatever nature.

I/we have gone through the terms and conditions mentioned above and understood them in entirety and undertake to abide by those terms and conditions relating to the account. I/we also agree to be bound by such terms & conditions as may be amended or supplemented from time to time.

---

Signature of the Applicant

Signature of the Applicant

Signature of the Applicant

Signature of the Applicant
The following papers/documents are required:

**Proprietorship Firm**
1) Two copies of passport size photograph of the account holder(s) person(s) who will operate the A/C duly attested by the introducer.
2) A/C introduced by current account holder.
3) Certified copy of valid trade license.
4) Proprietorship declaration in letterhead pad.
5) Trade seal.
6) Photocopy of valid passport (1 to 7 page)/nationality certificate issued by the ward commissioner or chairman etc.
7) TIN certificate.
8) One copy passport size photograph of nominee.(Attested by Account holder)

**Partnership Firm**
1) Two copies of passport size photograph of the account holder(s) person(s) who will operate the A/C duly attested by the introducer.
2) A/C introduced by current account holder.
3) Certified copy of valid trade license.
4) Resolution to open A/C.
5) Notarized copy of partnership deed duly signed by all partners (stamp Tk.500/- for capital less than Tk. 25000/- stamp Tk.1000/- for capital Tk.25000/- & above).
6) Partnership account agreement duly signed by all partners (draft enclosed).
7) Trade seal.
8) Photocopy of valid passport (1 to 7 page)/nationality certificate issued by the ward commissioner or chairman etc.
9) TIN certificate.

**Club / Society / School / College**
1) Two copies of passport size photograph of the account holder(s) person(s) who will operate the A/C duly attested by the introducer.
2) Account introduced by current/saving account holder.
3) Registration certificate (from respective Ministry/Directorate).
4) Certified copy of Memorandum of Association & Article of Association duly attested by the chairman/secrtary.
5) Resolution for opening & operation of the account duly attested by the chairman/secrtary.
6) Up to date list of office Bearers/Governing Body/Managing Committee duly certified by the chairman/secrtary.
7) Seal (designation wise) who will operate the account.
8) Passport/commissioner certificate of signatories.

**Limited Company**
1) Two copies of passport size photograph of the account holder(s) person(s) who will operate the A/C duly attested by the introducer.
2) Account introduced by current account holder.
3) Certified copy of Memorandum of Association & Article of Association duly signed or authenticated at each page by the Managing Director / Chairman.
4) Certified copy of incorporation.
5) Resolution of the board of directors for opening & operation of the account duly attested by the Managing Director or Chairman
6) List of Directors with name, father's name, mother's name, spouse's name, date of birth & signature (up-to-date) in letterhead pad of the company duly certified by the Chairman or Managing Director.
7) Seal (designation wise) who will operate the account.
8) Valid Trade License.
9) Photocopy of valid passport (1 to 7 page)/nationality certificate issued by the ward commissioner or chairman etc.
10) TIN Certificate.
11) Certified copy of certificate of commencement of Business duly authenticated by the Chairman or Managing Director (in case of public limited company).
12) Form X11 (in case of transfer of Directorship).

**Trust**
1) Two copies of passport size photograph of the account holder(s)/person(s) who will operate the A/C duly attested by the introducer.
2) A/C introduced by current/savings account holder.
3) Up to date list of members of the Trustee Board.
4) Certified copy of Deed of Trust.
5) Certified copy of the Resolution of the Trustee Board for opening & operation of the account.
6) Seal (designation wise) who will operate the account.
Note: This form must be renewed time to time

List of Questions to be used when obtaining source of wealth

Wealth Generated From Business Ownership
- Description and nature of the business and its operations
- Ownership type: private or public?
- What kind of company?
- Percent of ownership?
- Estimated sales volume?
- Estimated net income?
- Estimated net worth?
- How long in business?
- How was the business established?
- Other owners or partners (yes/no)?
- Names of other owners or partners?
- Percent owned by other owners or partners?
- Number of employees
- Number of locations?
- Geographic trade areas of business
- Other family members in business?
- Significant revenues from government contract or licenses?

Wealth Derived From Being a Top Executive
- Estimate of compensation?
- What does the company do? (for example, manufacturer, service...)
- Position held (for example, President, CEO)
- Length of time with company?
- Area of expertise (for example, finance, production, etc...)
- Publicly or privately owned?
- Client's past experience (for example, CEO at another company...)

Primary Source of Wealth was Through Inheritance
- In what business was the wealth generated?
- Inherited from whom?
- Type of asset inherited (for example: land, securities, company trusts...)
- When were the assets inherited?
- How much was inherited?
- Percent ownership for a business that is inherited

Wealth Generated From a Profession (Physician, dentist, lawyer, engineer, entertainer, professional sports...)
- What is the profession, including area of specialty (ex: arts - singer, construction - engineer)
- Source of wealth (Ex: lawyer who derived wealth from real estate, Dr. running a clinic...)
- Estimate of income

Wealth Generated From Investments
- Where did the source of wealth come from? (example, invested in shares, bonds, etc.)
- What do they currently invest in? (for example, real estate, stock market...)
- What is the size of the investment?
- Cite notable public transactions if any
- What is the client's role in transaction (ex: takes positions, buy companies, middle man)
- Estimated annual income/capital appreciation?
- How long has the client been an investor?
Identification of Directors & Authorized Signatories
(Company letterhead)

The Manager                                           Date: …………………
(Name of Branch)

Sub: Identification of Directors & Authorized signatories

This is to introduce the following directors of the company & authorized signatories of the account(s) of the company maintained with your bank.

<table>
<thead>
<tr>
<th>Name Designation</th>
<th>Father’s Name &amp; Mother’s Name</th>
<th>Date of birth &amp; Nationality</th>
<th>NID &amp; TIN</th>
<th>Present Address</th>
<th>Permanent Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We certify that information provided above is true and correct. Please treat this letter together with duly attested photographs of the above individuals attached herewith on separate sheet, as Photo Identification document.

Sincerely

------------------------------------------------------------------------------------------
Chairman/ Secretary (Name & Seal)
Explanation to Walk-in / One-off Customers

The AML Circular # 2 requires us to obtain satisfactory evidence of identification of applicants who do not maintain accounts with us for conducting one off transactions. You are therefore kindly requested to provide the following details, together with appropriate documentary evidence, before this transaction may proceed.

Thank you for your co-operation.

<table>
<thead>
<tr>
<th>NAME</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of birth</td>
<td>Nationality</td>
</tr>
<tr>
<td>Father’s Name</td>
<td>Mother’s Name</td>
</tr>
<tr>
<td>Address :</td>
<td></td>
</tr>
<tr>
<td>Other Identification</td>
<td>(Voter ID Card number, Passport details etc)</td>
</tr>
<tr>
<td>Value of Transaction :</td>
<td></td>
</tr>
<tr>
<td>Source of Fund :</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Signed</td>
</tr>
</tbody>
</table>

Note:

This is an example document which institutions who are regularly engaged in one-off transactions may care to adapt to their own requirements for obtaining verification of identity in accordance with the regulations.
Examples of Potentially Suspicious Transactions

The Bank may wish to make additional enquiries in the following circumstances

**BANKING TRANSACTIONS**

**Cash transactions**

- Unusually large cash deposits made by an individual or company whose ostensible business activities would normally be generated by cheques and other instruments.

- Substantial increases in cash deposits of any individual or business without apparent cause, especially if such deposits are subsequently transferred within a short period out of the account and/or to a destination not normally associated with the customer.

- Customers who deposit cash by means of numerous credit slips so that the total of each deposit is unremarkable, but the total of all the credits is significant.

- Company accounts whose transactions, both deposits and withdrawals, are denominated by cash rather than the forms of debit and credit normally associated with commercial operations (e.g. cheques, Letters of Credit, Bills of Exchange, etc.).

- Customers who constantly pay in or deposit cash to cover requests for payment order, bankers drafts, money transfers or other negotiable and readily marketable money instruments.

- Customers who seek to exchange large quantities of low denomination notes for those of higher denomination.

- Branches that have a great deal more cash transactions than usual. (Head Office statistics detect aberrations in cash transactions.)

- Customers whose deposits contain counterfeit notes or forged instruments.

- Customers transferring large sums of money to or from other locations with instructions for payment in cash.

- Large cash deposits using ATM facilities, thereby avoiding direct contact with bank or building society staff.

**Accounts**

- Customers who wish to maintain a number of trustee or client accounts which do not appear consistent with the type of business, including transactions which involve nominee names.
• Customers who have numerous accounts and pay in amounts of cash to each of them in circumstances in which the total of credits would be a large amount.

• Any individual or company whose account shows virtually no normal personal banking or business related activities, but is used to receive or disburse large sums which have no obvious purpose or relationship to the account holder and/or his business (e.g. a substantial increase in turnover on an account).

• Reluctance to provide normal information when opening an account, providing minimal or fictitious information or, when applying to open an account, providing information that is difficult or expensive for the financial institution to verify.

• Customer’s reluctance or refusal to disclose other banking relationships.

• Home address or business location is far removed from the Branch where the account is being opened and the purpose of maintaining an account at your Branch cannot be adequately explained.

• Reluctance or refusal to provide business financial statements.

• Information provided by the customer in the Transaction Profile does not make sense for the customer’s business.

• A visit to the place of business does not result in a comfortable feeling that the business is in the business they claim to be in.

• Customers who appear to have accounts with several financial institutions within the same locality, especially when the bank is aware of a regular consolidation process from such accounts prior to a request for onward transmission of the funds.

• Matching of payments out with credits paid in by cash on the same or previous day.

• Paying in large third party cheques endorsed in favor of the customer.

• Large cash withdrawals from a previously dormant/inactive account, or from an account which has just received an unexpected large credit from abroad.

• Customers who together, and simultaneously, use separate tellers to conduct large cash transactions or foreign exchange transactions.

• Greater use of safe deposit facilities. Increased activity by individuals. The use of sealed packets deposited and withdrawn.

• Companies’ representatives avoiding contact with the branch.

• Substantial increases in deposits of cash or negotiable instruments by a professional firm or company, using client accounts or in-house company or trust accounts, especially if the deposits are promptly transferred between other client company and trust accounts.
• Customers who show an apparent disregard for accounts offering more favorable terms

• Customers who decline to provide information that in normal circumstances would make the customer eligible for credit or for other banking services that would be regarded as valuable.

• Insufficient use of normal banking facilities, e.g. avoidance of high interest rate facilities for large balances.

• Large number of individuals making payments into the same account without an adequate explanation.

International banking/trade finance

• Customer introduced by an overseas branch, affiliate or other bank based in countries where production of drugs or drug trafficking may be prevalent.

• Use of Letters of Credit and other methods of trade finance to move money between countries where such trade is not consistent with the customer’s usual business.

• Customers who make regular and large payments, including wire transactions, that cannot be clearly identified as bona fide transactions to, or receive regular and large payments from: countries which are commonly associated with the production, processing or marketing of drugs; proscribed terrorist organizations; [tax haven countries].

• Building up of large balances, not consistent with the known turnover of the customer’s business, and subsequent transfer to account(s) held in other locations.

• Unexplained electronic fund transfers by customers on an in and out basis or without passing through an account.

• Frequent requests for TCs, foreign currency drafts or other negotiable instruments to be issued.

• Frequent paying in of TCs or foreign currency drafts, particularly if originating from overseas.

• Customers who show apparent disregard for arrangements offering more favorable terms.

Institution employees and agents

• Changes in employee characteristics, e.g. lavish life styles or avoiding taking holidays.

• Changes in employee or agent performance, e.g. the salesman selling products for cash have a remarkable or unexpected increase in performance.
Any dealing with an agent where the identity of the ultimate beneficiary or counterpart is undisclosed, contrary to normal procedure for the type of business concerned.

**Secured and unsecured lending**

- Customers who repay problem loans unexpectedly.

- Request to borrow against assets held by the financial institution or a third party, where the origin of the assets is not known or the assets are inconsistent with the customer’s standing.

- Request by a customer for a financial institution to provide or arrange finance where the source of the customer’s financial contribution to a deal is unclear, particularly where property is involved.

- Customers who unexpectedly repay in part or full a mortgage or other loan in a way inconsistent with their earnings capacity or asset base.
MERCHANT BANKING BUSINESS

New business

- A personal client for whom verification of identity proves unusually difficult and who is reluctant to provide details.

- A corporate/trust client where there are difficulties and delays in obtaining copies of the accounts or other documents of incorporation.

- A client with no discernible reason for using the firm’s service, e.g. clients whose requirements are not in the normal pattern of the institution’s business and could be more easily serviced elsewhere.

- An investor introduced by an overseas bank, affiliate or other investor, when both investor and introducer are based in countries where production of drugs or drug trafficking may be prevalent.

- Any transaction in which the counterparty to the transaction is unknown.

Dealing patterns and abnormal transactions

Dealing patterns

- A large number of security transactions across a number of jurisdictions.

- Transactions not in keeping with the investor’s normal activity, the financial markets in which the investor is active and the business which the investor operates.

- Buying and selling of a security with no discernible purpose or in circumstances which appear unusual, e.g. churning at the client’s request.

- Low grade securities purchases and sales, with the proceeds used to purchase high grade securities.

- Bearer securities held outside a recognized custodial system.

Abnormal transactions

- A number of transactions by the same counterparty in small amounts of the same security, each purchased for cash and then sold in one transaction, the proceeds being credited to an account different from the original account.

- Any transaction in which the nature, size or frequency appears unusual, e.g. early termination of packaged products at a loss due to front end loading, or early cancellation, especially where cash had been tendered and/or the refund cheque is to a third party.

- Transactions not in keeping with normal practice in the market to which they relate, e.g. with reference to market size and frequency, or at off-market prices.
- Other transactions linked to the transaction in question which could be designed to
disguise money and divert it into other forms or to other destinations or beneficiaries.

**Settlements Payment**

- A number of transactions by the same counterparty in small amounts of the same
  security, each purchased for cash and then sold in one transaction.
  
- Large transaction settlement by cash.
  
- Payment by way of third party cheque or money transfer where there is a variation
  between the account holder, the signatory and the prospective investor, must give rise
  to additional enquiries.

**Delivery**

- Settlement to be made by way of bearer securities from outside a recognized clearing
  system.
  
- Allotment letters for new issues in the name of persons other than the client.

**Disposition**

- Payment to a third party without any apparent connection with the investor.
  
- Settlement either by registration or delivery of securities to be made to an unverified
  third party.
  
- Abnormal settlement instructions including payment to apparently unconnected
  parties.
# Internal Suspicious Activity Report Form

*Strictly Private & confidential*

<table>
<thead>
<tr>
<th>To</th>
<th>Anti Money Laundering Compliance Officer</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>From</td>
<td>Name (Mr./ Ms)</td>
<td>Branch/Department</td>
</tr>
<tr>
<td></td>
<td>Job Title</td>
<td>SAR Ref No.</td>
</tr>
</tbody>
</table>

**Note:** This form may be completed in **English**. For any queries, please contact AMLCO. Please provide full details of the transaction(s) and any other relevant data. Attach copies of relevant documents/transaction notes.

<table>
<thead>
<tr>
<th>Customer/ Business Name</th>
<th>Transaction Date(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Account Number(s)</th>
<th>Copies of Transactions and Account Details Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

**Description of Transaction(s).** *(Nature of transaction, Origin & destination of Transaction etc)*

**Source of Funds and Purpose of Transaction** *(If you can, try to tactfully ask the customer)*

**Reasons why you think the transaction is suspicious** *(Give as much details as possible)*

**Signatures of Bank Staff.**

---

**TO BE COMPLETED BY BAMLCO.**

**ACTION TAKEN TO VALIDATE**

- Acknowledgement sent to the originator on ____________.
- Reviewed account documentation
- Discuss with the relationship manager/ branch manager.
- Other.

**AGREED SUSPICIOUS.** Yes/No

---

**Annexure F**
Some Important Circular issued by Bangladesh Bank regarding Anti-Money Laundering
All Banks and Financial Institutions

Instruction to be followed for compliance of the provisions contained in the Money Laundering Prevention Act, 2002.

Dear Sirs,

Attention is drawn to the Ma:La:Pra: Circular No. 01 dated 18.05.2002 of the Foreign Exchange Policy Department to the captioned subject.

02. For proper compliance of the provisions of Money Laundering Prevention Act, 2002 the following instructions are issued as per power conferred in section 4 of the above act for compliance by the banks and financial institutions.

(Ka) As per article 19(i) (Ka) of Money Laundering Prevention Act, 2002 each bank and financial institution will preserve correct and full information of their customer. Incase of request to remit money through draft/T.T from any person other than the account holder correct information with regard to full name and address of the person requesting for such remittance should be preserved. Detail instructions to be followed in this regard can be seen at Appendix ‘Ka’.

(Kha) Correct and detail up to date information of transactions in each account should be preserved and as per article 14(1) (Ka) of Money Laundering Prevention Act, 2002 the bank and financial institution will preserve record of transaction for a period of at least five years from the closing of transactions in the account of an client.

(Ga) To ensure compliance of the article 19 of the Money Laundering Prevention Act, 2002 each bank and financial institution will establish arrangement for internal observation and control through formation of a Central Compliance Unit under the leadership of a high official at the Head Office and nomination of a officer at the branch level of each bank and financial institution. In order to accomplish properly the Jurisdiction and function of the Central Compliance Unit, each bank and financial institution will determine institutional strategy and program. Central Compliance Unit will issue the instructions to be followed by the branches. These instructions will be prepared on the basis of combination of observation of transactions, internal control, policies and procedures from the point of view to prevent money laundering.

(Gha) In order to identify and monitor unusual transactions, each bank and financial institution will collect and preserve the prospective, transaction profile of the client. Transactions in the account will be considered as unusual of the same is inconsistent with the declared transaction profile provided if on enquiry the client failed to give sat satisfactory explanation.
(Umah) All employees of the bank and financial institution are to remain conscious and alert to identify unusual/suspicious transactions and just after detection of unusual/suspicious transactions which may have connections with money laundering as per article 19(1) (Ga) of Money Laundering Prevention Act, 2002 will be reported in writing as per proforma at Appendix-Ga attached herewith to the nominated compliance officer of the of the branch (REF. Appendix ‘Kha’ on the features of detecting unusual/suspicious transactions). The Compliance Officer will immediately analyse the reported incident properly and record in writing with reasons in details whether the transaction is connected with money laundering or not. If the reported issue appears to be connected with money laundering he will send immediately the details of the incident along with a copy of the above form to the Central Compliance Unit. Central Compliance Unit will examine and analyse the report received and record its observation on the above form Ga and if the incident is considered to be reportable to Bangladesh Bank, the same should be sent immediately to Anti-Money Laundering Department, Bangladesh bank, Head Office, Dhaka.

On the issue of reported unusual/suspicious transactions, no officer of the bank or financial institution will disclose the same to the clients or any other persons so that the investigation are hampered or influenced adversely.

(Cha) The nominated officer will send a consolidated quarterly statement of the cases reported to him to the Central Compliance Unit, Head office as per Appendix- Gha attached herewith, Central Compliance Unit will send the information of the reported cases to Anti-Money Laundering Department, Bangladesh Bank, Head office Dhaka on quarterly basis in the same proforma.

(Chha) In order to ensure proper compliance of the Money Laundering Prevention Act, 2002 each bank and financial institution will arrange proper training to its officers.

03. Formation of Central Compliance Unit and the reporting activities of unusual suspicious transactions should be taken immediately as per instruction mentioned above. Detailed internal instructions to be followed by the Central Compliance Unit and the branches should be prepared by 15th September, 2002 and should be informed this department of it with a copy there of.

Mean while please acknowledge receipt of it.

Enclosure: As stated.

Your’s Sincerely

Sd/-

(A.K.M. Mostafizur Rahman)
Deputy General Manager
Phone - 7120659
The Indicative List of Information to be obtained to Establish Customers' Identity

For every transaction correct identity of the customer has to be carefully ascertained. In this connection, in the applicable cases, importance should be given to the personal interview with the customer. For ensuring full satisfaction about the correct particulars of the customer, following information and documents should be collected and preserved.

Account Holder Customer:

(Ka) Personal Account:
(1) Name. (2) Present and Permanent Address, (3) Date of Birth, Age (4) Nationality, (5) TIN No.(if any) (6) Passport or employer certificate or certificate about the credentials by the Ward Commissioner/Union Chairman, (7) Photograph of the account holder (must be taken).

(Kha) Corporate or Business Firm Account:
(i) Sole Proprietorship: Requisite information as stated in 1 (a) relevant for the account operator along with trade license.

(ii) Partnership: Requisite information as stated in 1 (a) relevant for the partners along with Trade License and Partnership Deed.

(iii) Limited Company: Certificate of Incorporation, Articles and Memorandum of Association, Formal Resolution adopted in the Board meeting, declaration about the Directors and the information of 1 (a) relevant for the account operator (for verifying the genuineness of the information about the company and the directors, certified copies of the returns submitted to the Registrar of Joint Stock Companies should be taken. If the Company is incorporated outside Bangladesh, documents attested by the Bangladesh Embassies/High Commissions in the respective countries should be submitted).

(Ga) Account of Other Organizations:
(i) Club/Society: Particulars of the office, bearers, Constitution or By-Laws, if registered the Government authorization letter etc.

(ii) Co-operative Society/Limited Society: By-Laws authenticated by the Co-Operative Officer, particulars of the office bearers, resolution for opening of account, certificate of registration etc.

(iii) Private School, College and Madrasha: Full particulars of the members of the Governing Body or Managing Committee, Resolution for opening of Account, etc.

(iv) Trustee Board: Certified copy of the deed of the trust, full particulars of the members of the trustee Board, resolution for opening of Account, etc.

(2) Customer Other than Account Holder:
In case of request for remittance and other banking services made by the persons not maintaining an account with the bank full name and address of the requesting persons have to be preserved.
Appendix-Kha

**Indicative list of issues to be looked into for identifying unusual/suspicious transactions**

If proper explanation is not received on enquiry from the client on transactions which is inconsistent with the declared transaction profile of the client, then those transactions can be treated as unusual transactions.

Suspicious transactions will mean those transactions which have arisen out of activities mentioned in article 2 (Tha) of Money Laundering Prevention Act, 2002. In other words, the transactions which generally do not appear to have not been arisen out of known and legal earnings of the clients will be regarded as unusual transactions:

1. Some of the relevant features in identifying unusual/suspicious transaction at the branch level of banks/financial institutions are mentioned below:

   1.1 Transactions for unusually large amount inconsistent with the known income of the individual or company.
   
   1.2 Request for remittance to different destinations in favour of other parties with whom connection of the client is not clear.
   
   1.3 Although small deposits are made in each occasion, the accumulated total deposit is large enough to be inconsistent with the known activities of the client.
   
   1.4 At the time of opening account inability/unwillingness/delay in giving information about the client.
   
   1.5 Direct contact with the branch is often avoided by the representative of the company.
   
   1.6 Sale/purchase of securities for large amount inconsistent with the legal known income of the client.

2. Some of the relevant issues to be looked into by the Central Compliance Unit of the bank/financial institution in examining unusual/suspicious transactions:

   2.1 Sudden unusual increase/decrease in cash transaction and internal remittance through any branch.
   
   2.2 Receipt of fewer number of reports on unusual/suspicious transactions in comparison to other branches.
Appendix-Ga

Reporting Form of Unusual / Suspicious Transaction


------------------- Bank / Financial Institution
------------------- Branch

1. Reporting Officer :
   Name :
   Department/Division :
   Designation :

2. Information of the Suspected Person/ Institution in the Case of the Unusual / Suspicious Transaction:
   Ka) Name
   Kha) Address (Present and Permanent )
   Ga) Date of Birth
   Gha) Nationality
   Uma) Passport No. (If any)
   Cha ) TIN No. (If any )
   Chha) Account No & Type of Account
   Ja) Account Opening Date
   Jha) Name and Address of the Introducer for Opening the Account :

3. Description of Unusual/Suspicious Transaction :
   Ka) Amount of Money Involved :
   Kha ) Dates of Transaction :
   Ga ) Type of Transaction :

4. Reasons/Situations for Treating the Transaction as Unusual/Suspicious Transaction :

5. Other Information :

   Signature of Officer
   Time
   Date

--------------------------------------------------------------------------------------------------------------------------------

(To be filled in by the Compliance Officer of the Branch)

1. Report on the basis of investigation and analysis after detecting Unusual /Suspicious Transactions :
2. Whether the reported incident prima-facie falls under money laundering and reportable to the Central Compliance Unit or not : Yes/No.
3. Date and Reference No of reporting to the Central Compliance Unit :

   Date and Signature of the
   Branch Compliance Officer

---------------------------------------------------------------------------------------------------------------------

(To be filled in by the Central Compliance Unit)

1. Report on the basis of investigation and analysis after detecting an unusual /suspicious transactions
2. Whether the transaction falls under money laundering and need to be reported to Bangladesh Bank :
   Yes/No .
3. Date and Reference No of reporting to Bangladesh Bank :

   Signature of the designated officer of the Central Compliance Unit
   Reference No.
   Telephone and Fax No-
Quarterly Statement on Unusual /Suspicious Transactions

----------------------Bank
----------------------Branch

Consolidated quarterly statement as at ---------------

<table>
<thead>
<tr>
<th>SI No</th>
<th>Date of Reporting</th>
<th>Brief description of the incidence</th>
<th>Whether the incidence has been reported to the Central Compliance Unit, if so, Ref No and date</th>
<th>Whether the incidence has been reported to Bangladesh Bank by the Central Compliance Unit, if so, Ref No and date</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
<td>(2)</td>
<td>(3)</td>
<td>(4)</td>
<td>*(5)</td>
</tr>
</tbody>
</table>

Signature of Authorized Officer
Date

*Not required to be filled in by the branch
Guidance Notes on Preventing of Money Laundering এর অনুজ্ঞেয় ৬.৫ মোতাবেক 
Self Assessment এবং অনুজ্ঞেয় ৬.৬ মোতাবেক Independent Testing 
Procedures সম্পর্কে বিষয়সমূহ পরিপালনে অনুরূপীয় নির্দেশনাবিনি

ব্যয় মেনেয়ত, 

শিশুরক্ষক পরিষেবা Guidance Notes on Preventing of Money Laundering এর অনুজ্ঞেয় ৬.৫ ও ৬.৬ এর 
নির্দেশনা এবং Financial Action Task Force (FATF) এর ১৫ নম্বর সুপারিশ পরিপালনের নিমিতে অনুপ্রেরিত 
প্রোটিভটি শাখা অনুযায়ী অনুষ্ঠানের জন্ত Self Assessment এর নির্দিষ্ট চেকলিস্ট এবং কোম্পিয়ার পরিপালন ইউনিট ও অভ্যন্তরীণ নিম্নস্তর 
বিভাগের ব্যবহারের জন্য Independent Testing Procedures এর নির্দিষ্ট চেকলিস্ট এড়ানো সংযুক্ত হল (সংযুক্ত - ক, খ ও গ)।

০২। শাখাসমূহের কর্মী

(ক) প্রোটিভটি শাখা গাইডলেন নোটস অন্তর্ভুক্ত অন্ত মানুষের জন্য ৬.৫ মোতাবেক Self Assessment 
এর নির্দিষ্ট চেকলিস্ট (সংযুক্ত - ক) এর উপর ভিত্তি করে জালালিক ভিত্তিতে নিজেদের শাখার মূল্যায়ন করবে;

(খ) অলাভাবী মূল্যায়ন প্রতিষ্ঠানের প্রতিযোগিতা শাখা ব্যবসার সারাধিক শাখার ওজনপূর্ণ কর্মকাণ্ডের সময়ে সম্ভাব্য 
আঘাতের ব্যবস্থা করতে হবে। উক সরঞ্জাম শাখা মূল্যায়ন প্রতিষ্ঠানের উপর আলোচনা করতে হবে, সমস্যা চিহ্নিত 
করে তা সমাধানের উপায় বা সুপারিশ নির্ধারণ করতে ও তা লিপিবদ্ধ করতে হবে। পরবর্তী সাহায্যের পূর্ববর্তী ভাবে 
আলোচিত বিষয়, অর্পিত দায়িত্ব এবং অপারেটিভ বিষয় নিয়ে আলোচনা করতে হবে এবং

(গ) প্রোটিভটি ইজিমিসফাল সম্পর্কে হার পরের মাসের ২০ তারিখের মধ্যে শাখা মূল্যায়ন প্রতিষ্ঠান, এ বিষয়ে শাখা কর্তৃক 
গৃহীত উদ্ধৃতি এবং সুপারিশ ইস্তাম্ব থেকে কার্যকরীর অভ্যন্তরীণ নির্দেশনা বিভাগ ও কোম্পিয়ার 
পরিপালন ইউনিটে ফেলেন করতে হবে।

০৩। অভ্যন্তরীণ নির্দেশনা বিভাগের কর্মী

(ক) শাখাসমূহ হতে প্রাঙ্গণ শাখা মূল্যায়ন প্রতিষ্ঠান যাচাই করে কোন শাখায় কোন বৃহত্তর বিষয় পর্যবেক্ষিত হলে 
তাঁকে বিভিন্ন স্তরের সরঞ্জাম ব্যবস্থা করতে হবে এবং বিভিন্ন উপযোগী কর্তৃক করতে হবে।

(খ) গাইডলেন নোটস অন্তর্ভুক্ত অন্ত মানুষের জন্য ৬.৬ মোতাবেক Independent Testing 
Procedures এর নির্দিষ্ট চেকলিস্ট এর উপর ভিত্তি করে অভ্যন্তরীণ নির্দেশনা বিভাগ তাদের সমষ্টি শাখার নির্দেশনা 
প্রতিষ্ঠানের মান লাভ প্রতিষ্ঠার সম্পর্কে আলাদা অংশের সংযুক্ত হবে। অভ্যন্তরীণ নির্দেশনা বিভাগ তাদের সময় 
এবং ব্যাবসায়িক পরিদর্শন কর্মকাণ্ড অনুসারে বিভিন্ন শাখার সরঞ্জাম কার্যক্রম সম্পাদনকালে মানুষ লাভাঙ্গ প্রতিষ্ঠায় 
সম্পর্কে বিশেষ বিষয়ের অনুসারে পরীক্ষা করার এবং প্রতিষ্ঠানের মানুষ লাভ প্রতিষ্ঠার সমষ্টি অনুষ্ঠিত 
কর্ডের কোম্পিয়ার পরিপালন ইউনিটের সময় ফেলেন।

(গ)
কেন্দ্রীয় পরিপালন ইউনিটের করণীয়

(ক) শাখাসমূহ হতে প্রত্যেক শাখা মূল্যায়ণ প্রতিবেদন যোগাযোগ করে মান্যতা এবং প্রমাণিত বিভিন্ন প্রতিবেদন প্রতিটি প্রক্রিয়া আটক করে মন্ত্রণালয় ও সুপ্রতিষ্ঠান ব্যাংকের প্রধান নির্দেশীকৃত নিয়ম উপস্থাপন করবে।

(খ) শাখাসমূহ পরিদর্শন করার পর ব্যাংকের অভয়ার্থীরা নিরীক্ষা বিবেচনা করার প্রক্রিয়া প্রাতিষ্ঠানিক নিরীক্ষা প্রতিবেদনের উপর ভিত্তি করে যোগাযোগ প্রেক্ষাপটে শাখাসমূহের প্রতিষ্ঠাতা নিরীক্ষা মূল্যায়ন প্রতিবেদন প্রক্রিয়া আটক করতে হবে এবং মন্ত্রণালয় ও সুপ্রতিষ্ঠান ব্যাংকের প্রধান নির্দেশীকৃত নিয়ম উপস্থাপন করতে হবে। পরিদর্শন করার অভয়ার্থীর মূল্যায়ন প্রতিবেদনের নিয়ম উপস্থাপন করতে হবে।

(গ) উপরের যোগাযোগ মান্যতা এবং প্রতিবেদন প্রতিটি প্রক্রিয়া আটক করা প্রতিষ্ঠান সমাপ্তির পরবর্তী ৬০ দিনের মধ্যে জমা দিতে হবে।

এ নির্দেশ অনুসারে কার্যকর হবে। অনুগ্রহপূর্বক প্রতিষ্ঠা প্রকাশ করবেন।

আপনাদের বিশ্বাস,

সংযোজনী ৪ ০৬ (ছয়) পাতা।

(ম. মাহফুজুর রহমান)
মহাব্যবস্থাপক
ফোন: ৭১২০৬৫৯
### শাখা কর্তৃক শনিধিরীতি পদক্ষেপের মাধ্যমে নিজস্ব অবস্থান নির্যাত

গাইডেল নোটস অনুযায়ী মানী লভ্যতার এর ৬.৫ অনুসারে প্রক্রিয়াটি শাখা ব্যাংকের নিজের ও জাতীয় মানী লভ্যতার প্রতিরোধ নীতিমালার আলোকে নিম্নলিখিত প্রমাণপত্র বিজ্ঞাপন উত্তর প্রদানের মাধ্যমে শনিধিরীতি পদক্ষেপে নিজেদের অবস্থান নির্যাত করবে।

<table>
<thead>
<tr>
<th>প্রশ্নমালা</th>
<th>শাখার মন্তব্য</th>
</tr>
</thead>
<tbody>
<tr>
<td>১. শাখায় মোট কর্মকর্তা/কর্মচারীর সংখ্যা কত (পুনর্বিন্যাস)? শতকরা কতজন কর্মকর্তা/কর্মচারী মানী লভ্যতার প্রতিরোধ নীতিমালায় অন্তর্ভুক্ত প্রশ্নক্ষেত্র গঠন করেন?</td>
<td>বিষয়টি যাচাইরীতি পদক্ষেপ করে কি?</td>
</tr>
<tr>
<td>২. শাখার কর্মকর্তা/কর্মচারীগণ ব্যাংকের মানী লভ্যতার প্রতিরোধ সংঘর্ষ নীতি, প্রক্রিয়া ও প্রণয়ন এবং জাতীয় নীতিমালায় বাংলাদেশ ব্যাংকের গাইডলাইন সম্পর্কে অবহিত আছেন কি?</td>
<td>হলে কত সময় পর পর অনুষ্ঠিত হয়। যেহেতু, অনুচ্ছেদসূচী সকলের অন্তর্ভুক্ত জন লভ্যতার প্রতিরোধ সংঘর্ষ নীতিসহ গঠন করে হয় কিনা? সম্পর্কে কিছু গুরুত্বপূর্ণ নিদর্শন গৃহীত হয়েছে। কিন্তু, গৃহীত নিদর্শন কিভাবে পরিপালিত হয়?</td>
</tr>
<tr>
<td>৩. শাখা প্রত্যেক বিষয়ে বিভক্ততায় মানী লভ্যতার প্রতিরোধ নীতিমালায় অনুষ্ঠিত হয় কিনা?</td>
<td>উর্ধ্বতন পরিপূর্ণ কিভাবে যাচাই হয়? কিভাবে তা শাখায় সংরক্ষণ করা হয়?</td>
</tr>
<tr>
<td>৪. ব্যবস্থিতনীতি, কর্মচারী ও অন্যান্য হিসাব (হোমেন চার্ট, সম্মান, এস.টি.ইউ. এই আমীর, শ্রেষ্ঠ স্তর, FC, RFCD, NFCD) হ্রাসকের ক্ষেত্রে গাইডলাইন প্রতিষ্ঠিত সংঘর্ষজনক কর্ম করা হয় কিনা?</td>
<td>করে থাকলে এ পর্যন্ত কত কমটি উজ্জ্বল নিদর্শন শাখায় যাচাই হয়েছে? এর মধ্যে হিসাব যোগ ও পরিচালনা ক্ষেত্রে শাখা কী পদক্ষেপ গঠন করেছে?</td>
</tr>
<tr>
<td>৫. বুকিরি ভিত্তিতে শাখা তাদের গ্রাহকদের শ্রেণীবিন্যাস/শ্রেণীকরণ করে কি?</td>
<td>এ পর্যন্ত শাখা কর্তৃক KYC procedures সম্পন্ন হয়েছে কিনা? শাখার প্রশ্নের জন্য শাখা কী উদ্যোগ গঠন করেছে?</td>
</tr>
<tr>
<td>৬. ৩০ এপ্রিল, ২০২২ এর পূর্বে যোগ্য হিসাবে KYC procedures সম্পন্ন প্রত্যেক অধিগত সংঘর্ষজনক কর্ম কিনা?</td>
<td>শাখা কি গ্রাহকের KYC Profile নিদর্শন সময় পর পর জুড়ে মূল্যায়নপূর্বক হালনাগাদ করে থাকে?</td>
</tr>
<tr>
<td>৭. শাখা কি গ্রাহকের KYC Profile নিদর্শন সময় পর পর জুড়ে মূল্যায়নপূর্বক হালনাগাদ করে থাকে?</td>
<td>করে থাকলে কিভাবে এবং কত সময় পর পর এই মূল্যায়ন সম্পন্ন হয়ে থাকে?</td>
</tr>
<tr>
<td>৮. শাখা ভাবমান/চলে গ্রাহকদের ক্ষেত্রে KYC প্রতিষ্ঠিত করে কি?</td>
<td>করে থাকলে কিভাবে আলোচনা প্রতিষ্ঠামূলক সম্পন্ন করে থাকে?</td>
</tr>
<tr>
<td>৯. Online ব্যবস্থাগুলো এর ক্ষেত্রে বাংলাদেশ ব্যাংকের নির্দেশনা অনুযায়ী জমাদানকারী ও উদ্বোধনকারী তথ্য তথ্য চিহ্নিত করে কি?</td>
<td>হয়ে থাকলে কিভাবে শাখার সকলের তথ্য চিহ্নিত করে থাকে?</td>
</tr>
<tr>
<td>১০. শাখা কি বুকিরি ভিত্তিতে অন্যায় নিদর্শন সীমার উপরের লেনদেনের ভিত্তিতে গ্রাহকদের শ্রেণীবিন্যাসপূর্বক তাদের পরিবর্ধন TP এর সাথে গ্রাহকের লেনদেন মানটিং করে থাকে?</td>
<td>করে থাকলে কিভাবে নিদর্শন দেয়া হয়?</td>
</tr>
<tr>
<td>১১. এ শাখা শাখাকে কতওয়ালা সম্মেলনকারী লেনদেন (STR) সনাক্ত করা হয়েছে?</td>
<td>শাখা কর্তৃক STR সনাক্ত করার জন্য কী প্রবণতা পরিদৃষ্টি প্রদান করে হয়েছে?</td>
</tr>
<tr>
<td>নম্বর</td>
<td>শাখা কর্তৃক কোন পুনঃ পুনঃ নবনীতন লেনদেন (CTR) নীতি লেনদেন (Structuring) সনাক্তকরণ করার কোন পত্তি শাখা কর্তৃক প্রকাশিত হয়েছে কিনা?</td>
</tr>
<tr>
<td>-------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>12.</td>
<td>শাখা কর্তৃক নিয়মিত ও সার্টিফিকেটে CTR কেন্দ্রীয় পরিপক্কন ইনিউনট প্রয়োগ করা হয় কিনা?</td>
</tr>
<tr>
<td>13.</td>
<td>এমএল এইচি সাবরাল, প্রশিক্ষণ কেন্দ্র, বিনিময় ও অন্যান্য এমএল সংক্রান্ত বিষয়কারী মালিকাদের নিজের শাখা কর্তৃক সরবরাহ করা হয় কিনা? এই সাবরালের ইতিহাসের কপি শাখার সকল কর্মকর্তা/কর্মচারীদের সরবরাহ করা হয় কিনা?</td>
</tr>
<tr>
<td>14.</td>
<td>মানি লভারিং প্রতিযোগী সর্বোচ্চ-১৪ অনুমানের শাখায় PEPs এর কোন হিসাব সংরক্ষণ করা হয়েছে কিনা?</td>
</tr>
<tr>
<td>15.</td>
<td>মানি লভারিং অধিকায়ক-১৪ অনুমানের শাখায়। এর পরিবহন হিসাব সংরক্ষণ করা হয়েছে কিনা?</td>
</tr>
<tr>
<td>16.</td>
<td>প্রণালী অধিকারিক ও বাংলাদেশ ব্যাংকের পরিবহন প্রতিযোগী উপরোক্ত মানি লভারিং অধিকায়ক পরিপক্কন বিষয়ক দূর্বলতা/অনিয়মমূল্য নিয়ন্ত্রণ করা হয়েছে কিনা?</td>
</tr>
<tr>
<td>17.</td>
<td>শাখা কর্তৃক বৈদেশিক রেমিটেলসহ অন্যান্য ইনওয়ার্ড ও আউটওয়ার্ড রেমিটেল মনিটরিং করা হয় কিনা?</td>
</tr>
<tr>
<td>নং</td>
<td>অংশ/এরিয়া</td>
</tr>
<tr>
<td>-----</td>
<td>-------------</td>
</tr>
<tr>
<td>1.</td>
<td>শাখা পরিপালন ইউনিট</td>
</tr>
<tr>
<td>2.</td>
<td>বিশেষ দুই বছরে তিনি মানি লাভাহার প্রতিরক্ষা বিষয়ক কোন প্রশিক্ষণ অপ্র্যাল করেছেন কি?</td>
</tr>
<tr>
<td>3.</td>
<td>শাখার মানি লাভাহার প্রতিরক্ষা কর্মকর্তার যথাসাবধানে পরিবর্ধিত হচ্ছে- এ বিষয়টি নির্দিষ্ট হওয়ার লক্ষ্য BAMLCO নিন্দিত এবং এর উপনোয়া সময় পর পর এবং কর্মকর্তা প্রতিরক্ষা মনিটরিং ও পরিবারণ করে থাকেন কি?</td>
</tr>
<tr>
<td>4.</td>
<td>BAMLCO কর্তৃক শাখায় পরিচালিত উচ্চ বুদ্ধিমত্তা হিসাবের সকল হিসাবের লেনদেন মনিটরিং পর্যন্ত কি?</td>
</tr>
<tr>
<td>5.</td>
<td>মানি লাভাহার প্রতিরক্ষা সার্কেল-১৪ অনুসারে যাচাই PEPs এর কোন হিসাব সংরক্ষণ করা হচ্ছে কিনা?</td>
</tr>
<tr>
<td>6.</td>
<td>মানি লাভাহার প্রতিরক্ষা বিষয়ে কর্মকর্তা/কর্মচারীর জন্য</td>
</tr>
<tr>
<td>7.</td>
<td>শাখায় কর্মকর্তা/কর্মচারীরা মানি লাভাহার প্রতিরক্ষা সংরক্ষণ করেন, প্রতিটি ও প্রক্রিয়া এবং জাতীয় নিত্যমন্ত্রণালয় বাংলাদেশ ব্যাঙ্গালের পার্থক্য নির্ভর সম্পর্কে অপ্রিয়তা প্রদান কিনা?</td>
</tr>
</tbody>
</table>

3. এইচ প্রতিক্রিয়া হিসাবদাতিনের KYC
<table>
<thead>
<tr>
<th>Sl. No</th>
<th>(KYC) Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>6. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sl. No</th>
<th>KYC Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sl. No</th>
<th>KYC Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sl. No</th>
<th>KYC Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sl. No</th>
<th>KYC Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sl. No</th>
<th>KYC Procedure</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Know Your Customer, verify and authenticate the customer information and KYC documents. The data should be verified and certified.</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>3. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>4. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>5. KYC Profile and KYC Documents.</td>
<td></td>
</tr>
<tr>
<td>নং</td>
<td>অঞ্চল/এলায়া</td>
<td>প্রশ্নগুলো</td>
</tr>
<tr>
<td>-----</td>
<td>----------------</td>
<td>-------------</td>
</tr>
<tr>
<td>1.</td>
<td>CCU বর্বর বিবর্ণি দাবিদ</td>
<td>1. শায়া কর্তৃক একটি বিবর্ণি CCU বর্বর দাবিত করা হয়? শায়া কিছু বিবর্ণি দাবিত করা?</td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>রেকর্ড সংরক্ষণ</td>
<td>1. মানি লভারিং প্রতিরোধ আইন,২০০২ এর ১৯(১)(ক), নিয়মঃক্রি কর্তৃপক্ষ এবং ব্যাংকের নিঃসরণ নিয়মানুসারে শায়ার পরিচিতি (KYC) এবং লেনার সম্পর্কিত রেকর্ড থেকে নথিকৃত বিনাশ আছে কি?</td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>AML সম্পর্কিত শায়ার সার্বিক কার্যক্রম</td>
<td>1. শায়া ব্যাংক্সপাক BAMLCO না হলে শায়া ব্যাংক্সপাক AML প্রোগ্রাম ব্যবহারের তথ্যপ্রদক্ষণ ভুলি পালন করে কি?</td>
</tr>
<tr>
<td>6.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

শায়ার সার্বিক মুদ্রায়নঃ

<table>
<thead>
<tr>
<th>শায়ারের প্রান্তির ক্ষেত্র</th>
<th>রেটিং</th>
<th>সংস্থাজনক</th>
<th>প্রান্তির</th>
<th>সংস্থাজনক</th>
</tr>
</thead>
<tbody>
<tr>
<td>৯১-১০০</td>
<td>খুব ভাল</td>
<td>৯১-১০০</td>
<td>ভাল</td>
<td>৯১-১০০</td>
</tr>
<tr>
<td>৭১-৯০</td>
<td>ভাল</td>
<td>৭১-৯০</td>
<td>ভাল</td>
<td>৭১-৯০</td>
</tr>
<tr>
<td>৫৬-৭০</td>
<td>সংস্থাজনক</td>
<td>৫৬-৭০</td>
<td>সংস্থাজনক</td>
<td>৫৬-৭০</td>
</tr>
<tr>
<td>৪১-৫৫</td>
<td>প্রাতিষ্ঠানিক</td>
<td>৪১-৫৫</td>
<td>প্রাতিষ্ঠানিক</td>
<td>৪১-৫৫</td>
</tr>
<tr>
<td>৪০ ও এর নীচে</td>
<td>অসংস্থাজনক</td>
<td>৪০ ও এর নীচে</td>
<td>অসংস্থাজনক</td>
<td>৪০ ও এর নীচে</td>
</tr>
</tbody>
</table>
Instructions to be followed by the Banks and Financial institutions for compliance of the provisions contained in the Money Laundering Prevention Ordinance, 2008 and Anti Terrorism Ordinance, 2008

Attention is drawn to the AML Circular No. 16/2008 and 17/2008 issued on 29 April, 2008 and 29 June, 2008 respectively. As per power conferred in section 23 of Money Laundering Prevention ordinance, 2008 enacted on cancellation of Money Laundering Prevention Act, 2002 and as per power conferred in section 15 of Anti Terrorism ordinance, 2008 enacted in a new form, some amendments to the circulars issued under Money laundering Prevention Act, 2002 mentioned below and some instructions are hereby issued for your compliance.

02. In case of AML Circular No. 02 the changed instructions described in the table below.

<table>
<thead>
<tr>
<th>Article</th>
<th>The words/sentences to be substituted</th>
<th>The words/sentences by which to be substituted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article no.2</td>
<td>Money Laundering Prevention Act, 2002 and section (4)</td>
<td>Money Laundering Prevention ordinance, 2008 and section (4)</td>
</tr>
<tr>
<td>Article no.(2) (Ka) (Kha)(ga) and (uma)</td>
<td>(Ka) Section 19 (1) (Ka) of Money Laundering Prevention Act, 2002</td>
<td>(Ka) Money Laundering Prevention ordinance, 2008 and section (25)(1)</td>
</tr>
<tr>
<td></td>
<td>(Kha) section 19(1)(Ka) of Money Laundering Prevention Act, 2002</td>
<td>(Kha) Money Laundering Prevention ordinance, 2008 and section (25)(1)</td>
</tr>
<tr>
<td></td>
<td>(Ga) section 19 of Money Laundering Prevention Act, 2002</td>
<td>(Ga) Money Laundering Prevention ordinance, 2008 and section (25)</td>
</tr>
<tr>
<td></td>
<td>(Uma) section 19(1)(Ga) of Money Laundering Prevention Act, 2002</td>
<td>(Uma) Money Laundering Prevention ordinance, 2008 and section (25)(1)</td>
</tr>
</tbody>
</table>
Besides these Banks and Financial institutions, where applicable, shall have to follow the following additional instructions:

(Ka) No anonymous, fictitious account or account only with numbers shall be maintained or opened.

(Kha) Information regarding source of fund of the transaction by the customer and Beneficial owner (in case of Company, detailed information of controlling shareholder and 20% or more shares held by single holder) must be.

(Ga) While providing service obtained /based–modern technology to non face to face customers, reporting agency, under Money Laundering Prevention ordinance, 2008, shall have to assess Money Laundering and terrorist financing risk and adopt policies and procedures to mitigate those risks.

(Gha) Instruction contained in the Money Laundering Prevention ordinance, 2008, must be followed properly by the branches and subsidiary organisations located abroad of the reporting organisations as enlisted in the Money Laundering Prevention ordinance, 2008.

(Uma) No officials of the reporting Organisation shall divulge any information regarding the reported unusual or suspicious transactions any information, at any stage to its customer or any other person, so that investigation procedure is hampered or influenced adversely.

03. The following instruction in addition to the instructions of AML circular no. 07 shall have to be followed:

(Ka) Enhanced due diligence shall have to be ensured regarding respondent banks that maintain correspondent banking relationship with Shell Bank or maintain account with them or provides services to them.

04. In case of AML Circular no. 08 following instructions stated in the table below have to be followed:

<table>
<thead>
<tr>
<th>Article</th>
<th>The words/sentences to be substituted</th>
<th>The words/sentences by which to be substituted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title</td>
<td>section 4 and 19 of Money Laundering Prevention Act, 2002</td>
<td>section 23(1) (ka) of Money Laundering Prevention ordinance, 2008</td>
</tr>
<tr>
<td>Article no.(2)</td>
<td>Money Laundering Prevention Act, 2002 and section (4)</td>
<td>Money Laundering Prevention ordinance, 2008 and section (23)</td>
</tr>
<tr>
<td>Article no.2</td>
<td>Section 19 (4) of Money Laundering Prevention Act, 2002</td>
<td>section (25)(2) Money Laundering Prevention ordinance, 2008 and</td>
</tr>
</tbody>
</table>

Besides, all other instructions shall remain unchanged.

05. Banks under Anti-Terrorism ordinance, 2008 (Banks as defined in section 2(10) of the ordinance) shall perform the following activities.
Central Compliance of the Head office constituted as per instructions of money Laundering Prevention circular o2 and the officer nominated at the branch level shall perform the duty of compliance and internal monitoring of the instructions Anti-Terrorism ordinance, 2008 and the relevant instructions issued by the Bangladesh Bank.

All banks shall develop a system to detect and prevent transactions related to terrorist financing through banking channel.

if there is any reasonable ground to suspect that a transaction or an attempt of transaction has connection to financing terrorist activities as per Anti-Terrorism ordinance, 2008 shall have to be reported the same day with comments of the branch compliance officer to the Central Compliance unit of the concerned bank. CCU will examine and review the received report to General Manager, anti Money laundering department, Bangladesh Bank with Confidentiality. In case of sending the report to Bangladesh Bank, The CCU shall not in any way, delay for more than three working days from the date of the receipt of the report from the branches.

Board of Directors of each bank shall approve and circulate relevant instructions to be followed by the bank officials and shall send a copy these instructions to Bangladesh Bank, and shall also ensure the compliance of the instructions circulated by Bangladesh Bank.

While reporting Suspicious/unusual Transaction Report under Money Laundering Prevention Ordinance, 2008 and under Anti Terrorism Ordinance, 2008 Annexed Form Ka shall have to be used considering the STR Form attached to AML Circular-02, and AML Circular-10 as cancelled.

These instructions shall have immediate effect. Please acknowledge the receipt.

Yours Sincerely,
(Signed)
(Md. Eskandar Miah)
General Manager (current charge)
Phone - 7124366
Anti-Money Laundering Department  
Bangladesh Bank  
Head Office  
Dhaka.

AML Circular No. 24  
Date : 03 March, 2010

Managing Director/Chief Executive  
All banks and financial institutions

Instructions to be followed for compliance of the provisions of Money Laundering Prevention Act, 2009 and Anti Terrorism Act, 2009.

For compliance of the provisions of Money Laundering Prevention Act, 2009 and Anti Terrorism Act, 2009, by banks and financial institutions the following instructions are issued as per power conferred in section 23(1)(Gha) of Money Laundering Prevention Act, 2009 and in section 15(1) (chha) of Anti Terrorism Act, 2009:

01. Policies for Prevention of Money Laundering and Terrorist Financing

In pursuance of section 16(2) of Anti Terrorism Act, 2009 and Anti Money Laundering Department’s letter dated 04.07.2006, all banks and financial institutions must have their own policy manual approved by their Board of Directors/topmost committee to prevent money laundering and terrorist financing. This policy manual must be in conformity with international standard and laws and regulations in force in Bangladesh. Banks and the financial institutions shall from time to time review and confirm the meticulous compliance of the circulars issued by Bangladesh Bank.

02. Customer Identification;

It is mandatory to collect and verify the correct and complete identification information of customers to prevent money laundering and terrorist financing and to keep the financial sector free from risks. KYC (Know Your Customer) procedure shall apply to both individuals and institutions where customer is defined as under:

Ø any person or institution maintaining an account of any type with a bank or financial institution or having banking related business;
Ø the person or institution as true beneficial owner in whose favour the account is operated;
Ø the trustee, intermediary or true beneficial owner of the transaction of the accounts operated by the trust and professional intermediaries (such as lawyer/law firm, chartered accountant, etc)under the existing legal infrastructure;
Ø high value single transaction conducted in a single Demand Draft, Pay Order, Telegraphic Transfer by any person or institution or any person/institution involved in a financial transaction that may pose reputational and other risks to the institution. In this case if a transaction appears abnormal in relation to the usual transaction of the concerned person or institution that transaction will be treated as “high value”;

03. To protect banks and financial institutions from risks of money laundering or/and terrorist financing by customers willful or unwilling activities, the Money Laundering Prevention policy Manual as described in part one of this circular shall clearly state how to conduct Customer Due Diligence at different stages such as:

Ø while establishing relationship with the customer;
Ø while conducting financial transaction with the existing customer;
Ø while remitting money and providing other services at the request of non account holders; and
Ø While there is reasonable ground to suspect about the adequacy or veracity of previously obtained customer identification data.

3.1 To be sure about the customer’s identity and underlying purpose of establishing relationship with the institution, each institution shall collect adequate information up to its satisfaction.

Explanation: “Satisfaction of the institution” means satisfaction of the appropriate authority that necessary due diligence has been conducted considering the risks of the customers in the light of existing directions.

3.2 If a person operates an account on behalf of the customer, the concerned bank/financial institution must satisfy itself that the person has due authorization to operate. Correct and complete information of the person, operating the account, are to be collected.

3.3 Legal status and accuracy of information of the operators are to be ascertained in case of the accounts operated by trustee and professional intermediaries (such as lawyers/law firm, chartered accountants, etc).

3.4 While establishing and maintaining business relationship and conducting transaction with a person (including legal representative, financial institution or any other institution) of the countries and territories that do not meet international standard in combating money laundering (such as the countries and territories enlisted in Financial Action Task Force’s Non-cooperating Countries and Territories list) enhanced due diligence shall have to be ensured.

3.5 The identity of the beneficial owner of the account shall have to be confirmed on the basis of the information obtained from reliable sources up to the satisfaction of the institution:

Ø Complete and correct information of identity of the persons besides the customer, shall have to be collected and preserved if a customer operate an account on behalf of another person in his/her own name.

Ø The controller or the owner of the customer shall have to be identified.

Ø Complete and correct information of identity of the beneficial owners shall have to be collected and preserved. For the purpose of this subsection a person will be treated as a beneficial owner if:

   a) he has controlling share of a company or/and

   b) hold 20% or more shares of a company.

4. Politically exposed Persons (PEPs)

The instructions in relation to Politically Exposed Persons as contained in AML circular no. 14 dated 25 September 2007 stand substituted as follows:

While opening and/or operating account of Politically Exposed Persons (PEPs) enhanced due diligence shall have to be exercised. PEPs means “Individuals who are or have been entrusted with prominent public functions in a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials”. All instructions as detailed for PEPs shall equally apply if business relationship is established with the family members and close associates of these persons who may pose reputational risk to the bank.

Following instructions shall have to be followed to ensure Enhanced Due Diligence, while opening and operating the account of Politically Exposed Persons (PEPs):

ka) a risk management system shall have to be introduced to identify risks associated with the opening and operating accounts of PEPs;
kha) obtain senior management approval for establishing business relationships with such customers;
ga) take reasonable measures to establish the source of wealth and source of funds;
gha) ongoing monitoring of the transactions have to be conducted; and
uma) the banks/financial institutions should observe all formalities as detailed in Guidelines for Foreign Exchange Transactions while opening accounts of non-residents;

The above instructions shall also be applicable to customers or beneficial owners who become PEPs after business relationship have been established.

5. Correspondent Banking

The instructions in relation to correspondent banking as contained in the AML circular no 7 dated 14 august, 2005 and in the section 3(ka) of AML circular no 19 dated 14 august, 2008 shall be substituted by the instructions as follows:

5.1 For the purpose of this circular correspondent banking shall mean providing services which are approved by Bangladesh Bank like credit, deposit, collection, clearing, payment or other similar services by one bank (correspondent) to another bank (respondent).

5.2 While establishing and continuing correspondent banking relationship following drill should be observed so that banking system can not be abused for the purpose of money laundering:

Ø Before providing correspondent banking service senior management approval must be obtained on being satisfied about the nature of the business of the respondent bank through collection of information as per annexure-1

Ø Banks should establish or continue a correspondent relationship with a foreign bank only if it is satisfied that the bank is effectively supervised by the relevant authority.

Ø Banks should not establish or continue a correspondent banking relationship with any shell bank. [Here shell bank refers to such banks as are incorporated in a jurisdiction where it has no branches or activities and which is unaffiliated with a regulated financial group.]

Ø Correspondent banking relationship shall not be established or continued with those respondent banks that established correspondent banking relationship or maintain account with a shell bank.

Ø Banks should pay particular attention when maintaining a correspondent banking relationship with banks incorporated in a jurisdiction that do not meet international standards for the prevention of money laundering (such as the countries and territories enlisted in Financial Action Task Force’s Non-cooperating Countries and Territories list). Enhanced due diligence shall be required in such cases. Detailed information on the beneficial ownership of such banks and extensive information about their policies and procedures to prevent money laundering shall have to be obtained.

Ø Enhanced Due Diligence shall have to be exercised in case of the respondent banks that allow direct use of the correspondent account by their customers to transact business on their behalf (i.e. payable through account)

Ø The instructions described in this circular shall be applicable to the entire existing correspondent banking relationship.

6. Branches and subsidiaries situated/located in foreign jurisdiction

The instructions contained in section 2(gha) of AML circular no. 19 dated 14 august, 2008 shall be substituted by the following instructions:

6.1 Reporting organizations (in applicable cases) under Money Laundering Prevention Act, 2009 and Anti Terrorism Act, 2009 having branches and subsidiaries abroad shall
also comply with the provisions of Money Laundering Prevention Act, 2009 and Anti Terrorism Act, 2009.

6.2 If branch or a subsidiary located abroad, for any reason fails to comply with the instructions of Money Laundering Prevention Act, 2009 and Anti Terrorism Act, 2009 it shall without any delay report to such cases to Anti Money Laundering Department mentioning the reason of the failure.

7. Appointment and Training

7.1 Appointment: One of the major purposes of combating money laundering and terrorist financing activities is to protect the banks and financial institutions from risks arising out of money laundering and terrorist financing. To meet this objective, banks and Financial Institutions shall have to undertake proper screening mechanism in their different appointment procedures so that they do not face money laundering and terrorist financing risks by any of their staff.

7.2 Training for the officials: To ensure proper compliance of anti money laundering and anti terrorism activities each bank and financial institutions shall arrange suitable training for their officials. To deter siphoning of legally or illegally earned money abroad, banks and financial institutions shall also arrange trade based money laundering training along with anti money laundering and anti terrorism financing related training for their officials dealing in foreign exchange transactions.

7.3 Education and training for customers: Banks and financial institution shall respond to customers on different matters including KYC and TP attached to the account opening form with proper rationale. Banks and financial institutions shall time to time distribute leaflets among customers to make them aware about money laundering and terrorist financing and also arrange to stick posters in every branch at a visible place.

You are requested to ensure compliance of the instructions of this circular and bring the content of this circular to the notice of all concerned.

Meanwhile please acknowledge receipt.

Yours faithfully,

Enclosure: 02(two) pages.

(Debaprosad Debnath)
General Manager
Tel: 7125765
ANTI-MONEY LAUNDERING & TERRORIST FINANCING QUESTIONNAIRE FOR CORRESPONDENT RELATIONSHIP

A. BASIC INFORMATION
1. Name of the Institution: ____________________________________________
2. Registered Address: ______________________________________________
3. Website Address: _________________________________________________
4. Principal Business Activities: ______________________________________
5. Regulatory Authority: ______________________________________________
6. Operational Status:
   • Does your Bank maintain a physical presence in the licensing country? ☐ Yes ☐ No

B. OWNERSHIP / MANAGEMENT
1. Is your institution listed in any stock exchange? ☐ Yes ☐ No
   If so, which stock exchange? ______________________________
2. If “No” to Q7, please provide a list of the major shareholders holding more than 10% shares in your institution. _____________________________________________________

C. ANTI-MONEY LAUNDERING AND TERRORIST FINANCING CONTROLS
Additional information to be incorporated at the end of the questionnaire if your answer is “no” to any of the following questions

I. General AML&CFT Policies, Practices and Procedures:
1. Does your institution have policies and procedures approved by your institution’s board or senior management to prevent money laundering and combating terrorist financing? ☐ Yes ☐ No
2. Does your institution have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/CFT framework? ☐ Yes ☐ No
3. Has your institution developed written policies documenting the processes to prevent, detect and report suspicious transactions? ☐ Yes ☐ No
4. Does your institution have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.) ☐ Yes ☐ No
5. Does your institution permit the opening of anonymous or numbered accounts by customers? ☐ Yes ☐ No
6. Does your institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? ☐ Yes ☐ No
7. Does your institution have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates? ☐ Yes ☐ No
8. Does your institution have policies and procedures that require keeping all the records related to customer identification and their transactions? If “Yes”, for how long? ______________________________

II. Risk Assessment
1. Does your institution have a risk-based assessment of its customer base and their transactions? ☐ Yes ☐ No
2. Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions for those that have reason(s) to pose a heightened risk of illicit activities at or through the FI? ☐ Yes ☐ No

III. Know Your Customer, Due Diligence and Enhanced Due Diligence
1. Has your institution implemented processes for the identification of Beneficial Ownership (those customers on whose behalf it maintains or operates accounts or conducts transactions)? ☐ Yes ☐ No
2. Does your institution have a requirement to collect information regarding its customers’ business activities? ☐ Yes ☐ No
3. Does your institution have a process to review and, where appropriate, update customer information relating to high risk client information? ☐ Yes ☐ No
4. Does your institution have procedures to establish a record for each new customer noting their respective identification documents and “Know Your
Customer' information?

5. Does your institution complete a risk-based assessment to understand the normal and expected transactions of its customers? ☐ Yes ☐ No

IV. Reportable Transactions for Prevention and Detection of ML/TF

1. Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? ☐ Yes ☐ No

2. Where cash transaction reporting is mandatory, does your institution have procedures to identify transactions structured to avoid such obligations? ☐ Yes ☐ No

3. Does your institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? ☐ Yes ☐ No

4. Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin? ☐ Yes ☐ No

IV. Transaction Monitoring

Does your institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc? ☐ Yes ☐ No

V. AML Training

1. Does your institution provide AML&CFT training to relevant employees of your organisation? ☐ Yes ☐ No

2. Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? ☐ Yes ☐ No

3. Does your institution provide AML training to relevant third parties if they are employed to carry out some of the functions of your organisation? ☐ Yes ☐ No

Space for additional information:
(Please indicate which question the information is referring to.)
..............................................................................................................................
..............................................................................................................................
..............................................................................................................................

D. GENERAL

Does the responses provided in this Declaration applies to the following entities:

Head Office and all domestic branches
Overseas branches
Domestic subsidiaries
Overseas subsidiaries

If the response to any of the above is "No", please provide a list of the branches and/or subsidiaries that are excluded, including the name of the institution, location and contact details.

I, the undersigned, confirm to the best of my knowledge that the information provided in this questionnaire is current, accurate and representative of the anti-money laundering and anti-terrorist financing policies and procedures that are established in my institution.

I also confirm that I am authorized to complete this questionnaire on behalf of my institution.

Signature: 
Name: 
Designation: 
Date: 
Contact No: 
Email: 

- 6 -