

MAS 626

2 July 2007

NOTICE TO BANKS
MONETARY AUTHORITY OF SINGAPORE ACT, CAP. 186

**PREVENTION OF MONEY LAUNDERING AND COUNTERING THE FINANCING OF
TERRORISM - BANKS**

1 INTRODUCTION

- 1.1 This Notice is issued pursuant to section 27B of the Monetary Authority of Singapore Act (Cap. 186) and applies to all banks in Singapore, as defined in section 2 of the Banking Act (Cap.19).
- 1.2 This Notice shall take immediate effect.

2 DEFINITIONS

- 2.1 For the purposes of this Notice —

“AML/CFT” means anti-money laundering and countering the financing of terrorism;

“bank” means a bank in Singapore, as defined in section 2 of the Banking Act (Cap. 19);

“beneficial owner”, in relation to a customer of a bank, means the natural person who ultimately owns or controls a customer or the person on whose behalf a transaction is being conducted and includes the person who exercises ultimate effective control over a body corporate or unincorporate;

“business relations” means the opening or maintenance of an account by the bank in the name of a person and the undertaking of transactions by the bank for that person on that account;

“company” includes a body corporate formed or established outside Singapore under the law of the country or jurisdiction;

“CDD measures” or “customer due diligence measures” means the process of identifying the customer and obtaining information required by paragraph 4;

“customer”, in relation to a bank, means a person in whose name an account is opened or intended to be opened, or for whom the bank undertakes or intends to undertake any transaction without an account being opened;

“FATF” means the Financial Action Task Force;

“government entity” means a government of a country or jurisdiction, a ministry within such a government, or an agency specially established by such a government through written law;

“STR” means suspicious transaction report; and

“STRO” means the Suspicious Transactions Reporting Office, Commercial Affairs Department of the Singapore Police Force.

- 2.2 A reference to any threshold or value limit expressed in S\$ shall include a reference to the equivalent amount expressed in any other currency.
- 2.3 A reference to the completion of CDD measures is a reference to the situation when the bank has received satisfactory responses to all inquiries.
- 2.4 Unless the context otherwise requires, a reference to a financial institution supervised by the Authority does not include a person who is exempted from licensing, approval or regulation by the Authority.

3 UNDERLYING PRINCIPLES

- 3.1 This Notice is based on the following principles, which shall serve as a guide for all banks in the conduct of their operations and business activities:
 - (a) A bank must exercise due diligence when dealing with customers, persons appointed to act on the customer’s behalf and beneficial owners.
 - (b) A bank must conduct its business in conformity with high ethical

standards, and guard against undertaking any transaction that is or may be connected with or may facilitate money laundering or terrorist financing.

- (c) A bank should, whenever possible and to the fullest extent possible, assist and cooperate with the relevant law enforcement authorities in Singapore in preventing money laundering and terrorist financing.

4 CUSTOMER DUE DILIGENCE

Anonymous or Fictitious Account

- 4.1 No bank shall open or maintain anonymous accounts or accounts in fictitious names.

When CDD measures are to be Performed

- 4.2 A bank shall perform CDD measures in accordance with this Notice when —
 - (a) the bank establishes business relations with any customer;
 - (b) the bank undertakes any transaction of a value exceeding S\$20,000 for any customer who has not otherwise established business relations with the bank;
 - (c) there is a suspicion of money laundering or terrorist financing, notwithstanding that the bank would otherwise not be required by this Notice to perform CDD measures; or
 - (d) the bank has doubts about the veracity or adequacy of any information previously obtained.

CDD Measures where Business Relations are Established

(I) Identification of Customers

- 4.3 A bank shall identify each customer who applies to the bank to establish business relations.

- 4.4 For the purpose of paragraph 4.3, a bank shall obtain and record information of the customer, including but not limited to the following:
- (a) Full name, including any aliases;
 - (b) Unique identification number (such as an identity card number, birth certificate number or passport number, or where the customer is not a natural person, the incorporation number or business registration number);
 - (c) Existing residential address, registered or business address (as may be appropriate) and contact telephone number(s);
 - (d) Date of birth, incorporation or registration (as may be appropriate); and
 - (e) Nationality or place of incorporation or registration (as may be appropriate).
- 4.5 Where the customer is a company, the bank shall, apart from identifying the customer, also identify the directors of the company.
- 4.6 Where the customer is a partnership or a limited liability partnership, the bank shall, apart from identifying the customer, also identify the partners.
- 4.7 Where the customer is any other body corporate or unincorporate, the bank shall, apart from identifying the customer, also identify the persons having executive authority in that body corporate or unincorporate.
- (II) Verification of Identity
- 4.8 A bank shall verify the identity of the customer using reliable, independent sources.
- 4.9 A bank shall retain copies of all reference documents used to verify the identity of the customer.
- (III) Identification and Verification of Identity of Natural Persons Appointed to Act on the Customer's Behalf
- 4.10 Where the customer appoints one or more natural persons to act on his behalf in

establishing business relations with the bank or the customer is not a natural person, a bank shall —

- (a) identify the natural persons that act or are appointed to act on behalf of the customer;
- (b) verify the identity of these persons using reliable, independent sources; and
- (c) retain copies of all reference documents used to verify the identity of these persons.

4.11 A bank shall verify the due authority of such persons to act on behalf of the customer.

4.12 A bank shall verify the due authority of such persons to act by obtaining, including but not limited to the following:

- (a) the appropriate documentary evidence that the customer has appointed the persons to act on its behalf, and
- (b) the specimen signatures of the persons appointed.

4.13 Where the customer is a Singapore government entity, the bank shall only be required to obtain such information as may be required to confirm that the customer is a Singapore government entity as asserted.

(IV) Identification and Verification of Identity of Beneficial Owners

4.14 Subject to paragraph 4.17, a bank shall inquire if there exists any beneficial owner in relation to a customer.

4.15 Where there is one or more beneficial owner in relation to a customer, the bank shall take reasonable measures to obtain information sufficient to identify and verify the identities of the beneficial owner.

4.16 Where the customer is not a natural person, the bank shall take reasonable measures to understand the ownership and control structure of the customer.

4.17 A bank shall not be required to inquire if there exists any beneficial owner in relation to a customer that is —

- (a) a Singapore government entity;
- (b) a foreign government entity;
- (c) an entity listed on the Singapore Exchange;
- (d) an entity listed on a stock exchange outside of Singapore that is subject to regulatory disclosure requirements;
- (e) a financial institution supervised by the Authority (other than a holder of a money changer's licence or a holder of a remittance licence, unless specifically notified by the Authority);
- (f) a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF; or
- (g) an investment vehicle where the managers are financial institutions —
 - (i) supervised by the Authority; or
 - (ii) incorporated or established outside Singapore but are subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF,

unless the bank suspects that the transaction is connected with money laundering or terrorist financing.

4.18 For the purposes of paragraphs 4.17(f) and 4.17(g)(ii), a bank shall document the basis for its determination that the requirements in those paragraphs have been duly met.

(V) Information on the Purpose and Intended Nature of Business Relations

4.19 A bank shall obtain from the customer, when processing the application to establish business relations, information as to the purpose and intended nature

of business relations.

(VI) Ongoing Monitoring

- 4.20 A bank shall monitor on an ongoing basis, its business relations with customers.
- 4.21 A bank shall, during the course of business relations, observe the conduct of the customer's account and scrutinise transactions undertaken to ensure that the transactions are consistent with the bank's knowledge of the customer, its business and risk profile and where appropriate, the source of funds.
- 4.22 A bank shall pay special attention to all complex or unusually large transactions or unusual patterns of transactions that have no apparent or visible economic or lawful purpose.
- 4.23 A bank shall, to the extent possible, inquire into the background and purpose of the transactions in paragraph 4.22 and document its findings with a view to making this information available to the relevant competent authorities should the need arise.
- 4.24 A bank shall periodically review the adequacy of customer identification information obtained in respect of customers and beneficial owners and ensure that the information is kept up to date, particularly for higher risk categories of customers.

Non-Face-to-Face Verification

- 4.25 A bank shall put in place policies and procedures to address any specific risks associated with non-face-to-face business relationships or transactions.
- 4.26 A bank shall implement the policies and procedures referred to in paragraph 4.25 when establishing customer relationships and when conducting ongoing due diligence.
- 4.27 Where there is no face-to-face contact, the bank shall carry out CDD measures that are as stringent as those that would be required to be performed if there were face-to-face contact.

Reliance on Identification and Verification Already Performed

- 4.28 When a bank ("acquiring bank") acquires, either in whole or in part, the business of another financial institution (whether in Singapore or elsewhere), the acquiring bank shall perform CDD measures on the customers acquired with the business at the time of acquisition except where the acquiring bank has —
- (a) acquired at the same time all corresponding customer records (including customer identification information) and has no doubt or concerns about the veracity or adequacy of the information so acquired; and
 - (b) conducted due diligence enquiries that have not raised any doubt on the part of the acquiring bank as to the adequacy of AML/CFT measures previously adopted in relation to the business or part thereof now acquired by the acquiring bank.

CDD Measures for Non-Account Holders

- 4.29 A bank that undertakes any transaction of a value exceeding S\$20,000 for any customer who does not otherwise have business relations with the bank shall —
- (a) establish and verify the identity of the customer as if the customer had applied to the bank to establish business relations; and
 - (b) record adequate details of the transaction so as to permit the reconstruction of the transaction, including the nature and date of the transaction, the type and amount of currency involved, the value date, and the details of the payee or beneficiary.
- 4.30 Where a bank suspects that two or more transactions are or may be related, linked or the result of a deliberate restructuring of an otherwise single transaction into smaller transactions in order to evade the measures provided for in this Notice, the bank shall treat the transactions as a single transaction and aggregate their values for the purpose of this Notice.

Timing for Verification

- 4.31 Subject to paragraph 4.32 of this Notice, a bank shall complete verification of the identity of the customer and beneficial owner —

- (a) before the bank establishes business relations; or
 - (b) before the bank undertakes any transaction for a customer, where the customer does not have business relations with the bank.
- 4.32 A bank may establish business relations with a customer before completing the verification of the identity of the customer and beneficial owner if —
- (a) the deferral of completion of the verification of the identity of the customer and beneficial owner is essential in order not to interrupt the normal conduct of business operations; and
 - (b) the risks of money laundering and terrorist financing can be effectively managed by the bank.
- 4.33 Where the bank establishes business relations before verification of the identity of the customer or beneficial owner, the bank shall complete such verification as soon as is reasonably practicable.

Where CDD Measures are Not Completed

- 4.34 Where the bank is unable to complete CDD measures, it shall terminate the business relationship and consider if the circumstances are suspicious so as to warrant the filing of an STR.

Joint Account

- 4.35 In the case of a joint account, a bank shall perform CDD measures on all of the joint account holders as if each of them were individually customers of the bank.

Existing Customers

- 4.36 A bank shall perform such CDD measures as may be appropriate to its existing customers having regard to its own assessment of materiality and risk.

5 SIMPLIFIED CUSTOMER DUE DILIGENCE

- 5.1 Subject to paragraph 5.2, a bank may perform such simplified CDD measures as

it considers adequate to effectively identify and verify the identity of the customer, a natural person appointed to act on the customer's behalf and any beneficial owner if it is satisfied that the risks of money laundering and terrorist financing are low.

- 5.2 No bank shall perform simplified CDD measures in relation to customers that are from or in countries and jurisdictions known to have inadequate AML/CFT measures, as determined by the bank for itself or notified to banks generally by the Authority or by other foreign regulatory authorities.
- 5.3 A bank may perform simplified CDD measures in relation to a customer that is a financial institution supervised by the Authority (other than a holder of a money changer's licence or a holder of a remittance licence, unless specifically notified by the Authority).
- 5.4 Where the bank performs simplified CDD measures in relation to a customer, it shall document —
 - (a) the details of its risk assessment; and
 - (b) the nature of the simplified CDD measures.

6 ENHANCED CUSTOMER DUE DILIGENCE

Politically Exposed Persons

- 6.1 For the purposes of paragraph 6 —

"politically exposed person" means —

- (a) a natural person who is or has been entrusted with prominent public functions in a foreign country;
- (b) immediate family members of such a person; or
- (c) close associates of such a person.

"prominent public functions" includes the roles held by a head of state, a head of government, government ministers, senior civil servants, senior judicial or

military officials, senior executives of state owned corporations, and senior political party officials.

- 6.2 A bank shall, in addition to performing CDD measures specified in paragraph 4, perform enhanced CDD measures in relation to politically exposed persons, including but not limited to the following:
- (a) implement appropriate internal policies, procedures and controls to determine if a customer or beneficial owner is a politically exposed person;
 - (b) obtain approval from the bank's senior management to establish or continue business relations where the customer or a beneficial owner is a politically exposed person or subsequently becomes a politically exposed person;
 - (c) establish, by appropriate and reasonable means, the source of wealth and source of funds of the customer or beneficial owner; and
 - (d) conduct, during the course of business relations, enhanced monitoring of business relations with the customer.

Other High Risk Categories

- 6.3 A bank shall perform enhanced CDD measures in paragraph 6.2 for such other categories of customers, business relations or transactions as the bank may assess to present a higher risk for money laundering and terrorist financing.
- 6.4 A bank shall give particular attention to business relations and transactions with any person from or in countries and jurisdictions known to have inadequate AML/CFT measures, as determined by the bank for itself or notified to banks generally by the Authority or other foreign regulatory authorities.

7 PERFORMANCE OF CDD MEASURES BY INTERMEDIARIES

- 7.1 Subject to paragraph 7.2, a bank may rely on an intermediary to perform the CDD measures in paragraph 4 of this Notice if the following requirements are met:
- (a) the bank is satisfied that the intermediary it intends to rely upon is subject

to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF, and has adequate measures in place to comply with those requirements;

- (b) the intermediary is not one on which banks have been specifically precluded by the Authority from relying;
- (c) the information that the bank would be required or would want to obtain which is being obtained by the intermediary may be relayed to the bank by the intermediary without any delay; and
- (d) the intermediary is able and willing to provide, without delay, upon the bank's request, any document obtained by the intermediary which the bank would be required or would want to obtain.

7.2 No bank shall rely on an intermediary to conduct ongoing monitoring of customers.

7.3 Where a bank relies on an intermediary to perform the CDD measures, it shall document the basis for its satisfaction that the requirements in paragraph 7.1(a) have been met except where the intermediary is a financial institution supervised by the Authority (other than a holder of a money changer's licence or a holder of a remittance licence).

7.4 For the avoidance of doubt, notwithstanding the reliance upon an intermediary, the bank shall remain responsible for its AML/CFT obligations in this Notice.

8 CORRESPONDENT BANKING

8.1 Paragraph 8 applies to a bank in Singapore when it provides correspondent banking services in Singapore to another bank or financial institution that is operating outside Singapore.

8.2 For the purposes of paragraph 8 —

- (a) "correspondent bank" means the bank in Singapore that provides or intends to provide correspondent banking services in Singapore;
- (b) "cross-border correspondent banking" means correspondent banking

services provided to a bank or financial institution that is operating outside Singapore;

- (c) "payable-through account" means an account maintained at the correspondent bank by the respondent bank but which is accessible directly by a third party to effect transactions on its own behalf;
- (d) "respondent bank" means the bank or financial institution outside Singapore to whom correspondent banking services in Singapore are provided; and
- (e) "shell bank" means a bank incorporated, formed or established in a country or jurisdiction where the bank has no physical presence and which is unaffiliated to a regulated financial group.

8.3 A bank in Singapore shall perform the following measures when providing cross-border correspondent banking services —

- (a) assess the suitability of the respondent bank by taking the following steps:
 - (i) gather adequate information about the respondent bank to understand fully the nature of the respondent bank's business, including making appropriate inquiries on its management, its major business activities and the countries or jurisdictions in which it operates;
 - (ii) determine from any available sources the reputation of the respondent bank and, as far as practicable, the quality of supervision over the respondent bank, including where possible whether it has been the subject of money laundering or terrorist financing investigation or regulatory action; and
 - (iii) assess the respondent bank's AML/CFT controls and ascertain that they are adequate and effective, having regard to the AML/CFT measures of the country or jurisdiction in which the respondent bank operates;
- (b) document the respective AML/CFT responsibilities of each bank; and

- (c) obtain approval from the bank's senior management to provide new correspondent banking services.
- 8.4 Where the cross-border banking services involve a payable-through account, the correspondent bank shall be satisfied that —
 - (a) the respondent bank has performed appropriate CDD measures at least equivalent to those specified in paragraph 4 on the third party having direct access to the payable-through account; and
 - (b) the respondent bank is able to perform ongoing monitoring of its business relations with that third party and is willing and able to provide customer identification information to the correspondent bank upon request.
- 8.5 The correspondent bank shall document the basis for its satisfaction that the requirements in paragraphs 8.3 and 8.4 are met.
- 8.6 No bank in Singapore shall enter into or continue correspondent banking relations with a shell bank.
- 8.7 A bank shall also take appropriate measures when establishing correspondent banking relations, to satisfy itself that its respondent banks do not permit their accounts to be used by shell banks.

9 WIRE TRANSFERS

- 9.1 Paragraph 9 shall apply to a bank in Singapore when it effects the sending of funds by wire transfer or when it receives funds by wire transfer on the account of a person but shall not apply to a transfer and settlement between the bank and another financial institution where the bank and the other financial institution are acting on their own behalf as the wire transfer originator and the beneficiary institution.
- 9.2 For the purposes of paragraph 9 —

"beneficiary institution" means the financial institution that receives the funds on the account of the wire transfer beneficiary;

“cross-border wire transfer” means a wire transfer where the ordering institution and the beneficiary institution are in different countries or jurisdictions;

“intermediary institution” means the financial institution that is an intermediary in the wire transfer payment chain;

“ordering institution” means the financial institution that acts on the instructions of the wire transfer originator in sending the funds;

“wire transfer beneficiary” means the person to whom or for whose benefit the funds are sent; and

“wire transfer originator” means the person who initiates the sending of funds.

Responsibility of the Ordering Institution

(I) Identification and Recording of Information

9.3 Before effecting a wire transfer, every bank that is an ordering institution shall —

- (a) identify the wire transfer originator and verify his identity (if the bank has not already done so by virtue of paragraph 4); and
- (b) record adequate details of the wire transfer so as to permit its reconstruction, including at least the date of the wire transfer, the type and amount of currency involved, the value date and the details of the wire transfer beneficiary and the beneficiary institution.

(II) Cross-border Wire Transfers Exceeding S\$2,000

9.4 In a cross-border wire transfer where the amount to be transferred exceeds S\$2,000, every bank which is an ordering institution shall include in the message or payment instruction that accompanies or relates to the wire transfer the following:

- (a) the name of the wire transfer originator;
- (b) the wire transfer originator’s account number (or unique reference number assigned by the ordering institution where no account number

exists); and

- (c) the wire transfer originator's address, unique identification number, or date and place of birth.

(III) Domestic Wire Transfers

9.5 In a domestic wire transfer, every bank that is an ordering institution shall either —

- (a) include in the message or payment instruction that accompanies or relates to the wire transfer all of the originator information required to be included as if the transaction had been a cross-border wire transfer exceeding S\$2,000; or
- (b) include only the originator's account number (or unique reference number where no account number exists) but be in a position to make the remaining originator information available within 3 working days of a request being made by the beneficiary institution.

Responsibility of the Beneficiary Institution

9.6 A bank that is a beneficiary institution shall implement appropriate internal risk-based policies, procedures and controls for identifying and handling in-coming wire transfers that are not accompanied by complete originator information.

Responsibility of Intermediary Institution

9.7 A bank that is an intermediary institution shall, in passing onward the message or payment instruction, maintain all the required originator information with the wire transfer.

10 RECORD KEEPING

10.1 A bank shall prepare, maintain and retain documentation on all its business relations and transactions with its customers such that —

- (a) all requirements imposed by law (including this Notice) are met;

- (b) any transaction undertaken by the bank can be reconstructed so as to provide, if necessary, evidence for prosecution of criminal activity;
 - (c) the relevant competent authorities in Singapore and the internal and external auditors of the bank are able to review the bank's transactions and assess the level of compliance with this Notice; and
 - (d) the bank can satisfy, within a reasonable time or any more specific time period imposed by law, any enquiry or order from the relevant competent authorities in Singapore for information.
- 10.2 Subject to paragraph 10.4 and any other requirements imposed by law, a bank shall, when setting its record retention policies, comply with the following document retention periods:
- (a) a period of at least 5 years following the termination of business relations for customer identification information, and other documents relating to the establishment of business relations, as well as account files and business correspondence; and
 - (b) a period of at least 5 years following the completion of the transaction for records relating to a transaction, including any information needed to explain and reconstruct the transaction.
- 10.3 A bank may retain documents as originals or copies, in paper or electronic form or on microfilm, provided that they are admissible as evidence in a Singapore court of law.
- 10.4 A bank shall retain records pertaining to a matter which is under investigation or which has been the subject of an STR for such longer period as may be necessary in accordance with any request or order from STRO or from other relevant competent authorities.

11 SUSPICIOUS TRANSACTIONS REPORTING

- 11.1 A bank shall keep in mind the provisions in the Corruption, Drug Trafficking and

Other Serious Crimes (Confiscation of Benefits) Act¹ and in the Terrorism (Suppression of Financing) Act (Cap. 325) that provide for the reporting to the competent authorities of transactions suspected of being connected with money laundering or terrorist financing, and implement appropriate internal policies, procedures and controls for meeting its obligations under the law, including the following:

- (a) establish a single reference point within the organisation to whom all staff are instructed to promptly refer all transactions suspected of being connected with money-laundering or terrorist financing, for possible referral to STRO via STRs; and
 - (b) keep records of all transactions referred to STRO, together with all internal findings and analysis done in relation to them.
- 11.2 A bank shall submit reports on suspicious transactions (including attempted transactions) to STRO, and extend a copy to the Authority for information.
- 11.3 A bank shall consider if the circumstances are suspicious so as to warrant the filing of an STR and document the basis for its determination where —
- (a) the bank is for any reason unable to complete CDD measures; or
 - (b) the customer is reluctant, unable or unwilling to provide any information requested by the bank, decides to withdraw a pending application to establish business relations or a pending transaction, or to terminate existing business relations.

12 INTERNAL POLICIES, COMPLIANCE, AUDIT AND TRAINING

- 12.1 A bank shall develop and implement internal policies, procedures and controls to help prevent money laundering and terrorist financing and communicate these to its employees.
- 12.2 The policies, procedures and controls shall include, amongst other things, CDD measures, record retention, the detection of unusual and/or suspicious transactions and the obligation to make suspicious transaction reports.

¹ Please note in particular section 48 of the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act on tipping-off.

- 12.3 A bank shall take into consideration money laundering and terrorist financing threats that may arise from the use of new or developing technologies, especially those that favour anonymity, in formulating its policies, procedures and controls.

Group Policy

- 12.4 A bank that is incorporated in Singapore shall develop a group policy on AML/CFT and extend this to all of its branches and subsidiaries outside Singapore.
- 12.5 Where a bank has a branch or subsidiary in a host country or jurisdiction known to have inadequate AML/CFT measures (as determined by the bank for itself or notified to banks generally by the Authority or by other foreign regulatory authorities), the bank shall ensure that its group policy on AML/CFT is strictly observed by the management of that branch or subsidiary.
- 12.6 Where the AML/CFT requirements in the host country or jurisdiction differ from those in Singapore, the bank shall require that the overseas branch or subsidiary apply the higher of the two standards, to the extent that the law of the host country or jurisdiction so permits.
- 12.7 Where the law of the host country or jurisdiction conflicts with Singapore law such that the overseas branch or subsidiary is unable to fully observe the higher standard, the bank's head office shall report this to the Authority and comply with such further directions as may be given by the Authority.

Compliance

- 12.8 A bank shall develop appropriate compliance management arrangements, including at least, the appointment of a management level officer as the AML/CFT compliance officer.
- 12.9 A bank shall ensure that the AML/CFT compliance officer, as well as any other persons appointed to assist him, has timely access to all customer records and other relevant information which they require to discharge their functions.

Audit

12.10 A bank shall maintain an audit function that is adequately resourced and independent, and which will be able to regularly assess the effectiveness of the bank's internal policies, procedures and controls, and its compliance with regulatory requirements.

Employee Hiring

12.11 A bank shall have in place screening procedures to ensure high standards when hiring employees.

Training

12.12 A bank shall take all appropriate steps to ensure that its staff (whether in Singapore or overseas) are regularly trained on —

- (a) AML/CFT laws and regulations, and in particular, CDD measures, detecting and reporting of suspicious transactions;
- (b) prevailing techniques, methods and trends in money laundering and terrorist financing; and
- (c) the bank's internal policies, procedures and controls on AML/CFT and the roles and responsibilities of staff in combating money laundering and terrorist financing.