

IN THE NAME OF ALLAH,  
THE MOST GRACIOUS, THE MOST MERCIFUL



**CENTRAL BANK OF SUDAN**

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**Date: 23<sup>rd</sup> Safar, 1428  
Corresponding to: 13<sup>th</sup> March, 2007**

**Banking Regulation and Development Department  
Circular No. ( 9/2007 )  
Addressed to all Banks and Financial Institutions,  
Assalamu Alaikum Warahmatullahi Wabarakatuhu,**

**SUBJECT: Anti-Money Laundering and Combating  
Financing of Terrorism**

**Introduction:**

The Anti-Money Laundering and Combating Financing of Terrorism receives great attention from the monetary and banking authorities and the supervisory and regulatory bodies on the domestic and international levels, due to the risks emanating from the money laundering operations and financing of terrorism which have negative effects on the safety and soundness of the national and international economy. The importance of money laundering increased after it's connection with financing of terrorism which led to the revival of the international supervisory and regulatory bodies to enact legislations in order to protect their economies, financial and banking markets against suspicious operations which aim at money laundering and financing of terrorism via their financial markets.

The Central Bank of Sudan in its efforts for Anti-Money Laundering and Combating Financing of Terrorism via the banking system and the financial

institutions, and in the context of solidarity with the international, regional and local efforts exerted in resisting this phenomenon and aspiring to observe soundness of the banking business and protecting banks and financial institutions from the risks of being exploited in money laundering operations and financing of terrorism and based on the regulation and supervisory duties of the Central Bank of Sudan, particularly with respect to implementing Anti-money Laundering Act, 2003 and Articles (8) and (36) (3,2) (38) of the Banking Regulation Act, 2003, it is decided to cancel Circular No. (4/2002) regarding combating money laundering and issue the following rules and regulations:-

**FIRST: Interpretation:**

The following words and phrases shall have the following specified meanings whenever they are mentioned in this Circular :-

**Money Laundering:** In addition to the definition stated in the Sudanese Money Laundering Act, 2003, money laundering shall be defined as any behavior which involve acquiring money, possessing, disposing, carrying, managing, keeping, replacing, depositing, investing or manipulating in its value, movement and transferring or covering up, camouflaging its source, real nature, place, method of disposition, ownership or the related rights whenever this money have been received from a crime and whether this crime occurred inside or outside the Sudan, provided that it is punished by the Sudanese and foreign laws.

**Financing of Terrorism:** Collecting or providing funds in a direct or indirect manner with the intention of using it wholly or partially to commit one of the terrorist crimes stated in the Sudanese Combating Terrorism Act, 2001 whether by a terrorist organization or by any person committing, setting to, participating, planning, organizing, instigating in a direct or indirect manner and by any means to commit one of the terrorist crimes.

**Funds:** In addition to the definition stated in the Sudanese Money Laundering Act, 2003, assets shall be defined whatever their type may be, material or moral, movable or fixed, national or foreign currencies, financial and commercial papers, Sukouks and the documents which affirm ownership of funds or any right relating to it.

**Unit:** Refers to the Unit of Anti- money laundering and combating financing of terrorism in the Central Bank of Sudan – Banking Regulation and Development Department.

**The Actual Beneficiary:** He is the natural person who holds the genuine well or the real interest in the relationship or the existing operation between the bank and the client or the person for whose account, the operations are carried and this include the natural persons who practice control over the legal entity.

**The Continuous Relationship:** It is the relationship which stars between the bank and the customer and relate to the activities and services rendered by the bank to its customers and which is expected upon its establishment to continue for a long period of time.

**Occasional Customer:** He is the customer who is not connected with a continuous relationship with the bank.

**Politically Exposed Persons (PEPs):** They are the persons who occupy or had occupied higher public posts in a foreign country such as Head of State or Government or a prominent politician, a judge, a soldier, a high level government post, prominent persons in a political party and this include individuals of the families of those persons up to the third degree and those related to them.

**The Societies and Organizations which do not Aim at Profit:** Any society or organization established in accordance with the provisions of the Law and its main objective is the provision of social services without aiming from its activity to achieve profit or share it or achieve a personal benefit. This include the societies which do not aim to achieve profit from the establishment in accordance with the provisions of the Companies Act and the organizations established in accordance with the Voluntary and Humanitarian Work Organization Act which include the national voluntary organizations, the civil society organizations, charitable organizations and the foreign voluntary organizations.

**Desk Officer:** He is the responsible and committed person to notify the Anti-Money Laundering and Combating Financing of Terrorism Unit about the suspected operations in the bank or the financial institution.

**The Shell Bank:** It is the bank which hasn't any physical existence to practice and manage through its real activities in the country in which it is established.

**The Joint Accounts:** They are the accounts on which two or more persons joint together provided that the relationship between them shall not be a commercial one.

### **SECOND: The Scope of Validity:**

This Circular shall be effective on all banks and financial institutions working in the Sudan and their branches and subsidiary companies wherever their headquarters may be.

### **THIRD: Requirements of Customer Due Diligence:**

#### **(A) General Rules:**

- 1) Due diligence of customer refers to the recognition and verification of the identity of the client, the actual beneficiary and the continuous follow-up of the operations, in addition to recognition of the nature of the future relationship between the bank and the client and the purpose of it.
- 2) It is not permitted to deal or enter into banking relationship with unknown persons or phony names.
- 3) The bank or the financial institution shall exert due diligence of clients when establishing any continuous relationship with them.
- 4) The bank or the financial institution shall exert due diligence of occasional customers in the following situations:-
  - a) If the value of the transaction exceeded (***SDG.25,000***) or its equivalent in foreign currencies.
  - b) If the doubt exists that the transient transaction is related to a money laundering operation or financing of terrorism.
- 5) The bank should adopt due diligence procedures regarding its customers before and during the establishment of the banking relationship or at the time when executing the transactions for the accounts of the transient clients for whom what is mentioned in (4) above is applicable.
- 6) If the bank or the financial institution is unable to provide the required procedures of customer due diligence, the bank must not open the account or enter into any banking relationship with the customer or execute any operation for his favour.

- 7) The verification procedures maybe postponed to after establishing the banking relationship according to the following :-
  - a) The postponement of the verification procedures shall be a vital thing for the normal processing of business provided that it shall not be followed by the risks of money laundering or financing of terrorism.
  - b) The bank shall accomplish the verification procedures at the nearest possible time.
  - c) The bank or the financial institution must take the required measures of the prudent management of the risks of money laundering operations and financing of terrorism for the postponed case and this include formulating limits for the number, type and amount of the operations which can be executed before completion of the verification procedures.
- 8) In case the bank or the financial institution entered into a banking relationship with the client before fulfillment of the verification procedures as stated in item (7) and inability of the bank to fulfill it consequently, the bank must end this relationship and notify the Unit according to the procedures stipulated in item (Six) of this Circular.
- 9) It must be ascertained that the customer is not included in the lists of the defaulters or banned customer issued by the Central Bank of Sudan before entering into a continuous relationship with him. Moreover, the bank shouldn't execute any transaction to a customer included in the banning lists.
- 10) The bank or the financial institution shall by itself undertake the required due diligence procedures and is not allowed to depend on a third party to fulfill these procedures.
- 11) The bank or the financial institution shall review the identity papers to recognize the identity of the client together with obtaining a copy thereof signed from the competent employee indicating that it is a true copy.
- 12) Obtaining an acceptable recommendation for the customer who wishes to enter into a continuous relationship. This recommendation shall be from a bank with which the customer previously dealt with and existed in it conditions (3) and (4) relating to dealings with correspondent banks stated in item (Fourth) (d) below or from known persons to the bank or the financial institution (at least two), with good reputation. Other than that, the approval of the top management of the bank must be obtained.

- 13) The power of approving entering into a continuous relationship with the customer rests with the branch manager or the person acting on his behalf.
- 14) The bank or the financial institution must update the data for recognizing the identity of the customer every five years or upon the emergence of reasons inspiring that such as the existence of doubt with the bank or the financial institution about the correctness or suitability of the data and the information obtained previously or if the bank anticipated an increase in the degree of risks of money laundering and financing of terrorism with respect to a particular client or a category of customer.
- 15) The bank or the financial institution must observe in a continuous manner its relationship with the customer until it recognized the pattern of his dealings and discover any dealings inconsistent with this pattern or with the nature of the customer's activity.
- 16) It is not permitted for any employee in any bank to manage an account on behalf of others for any of the bank's customers.
- 17) The bank must ensure that its subsidiary branches and companies in other countries observe the required conditions for Anti-Money Laundering and Combating Financing of Terrorism with what is consistent with the requirements of the host country. In case of differences between the conditions and requirements of Anti-Money Laundering and Combating Financing of Terrorism between the home country and the host country, the stronger and tougher conditions must be applied.

**(B) Procedures for Recognizing and Verifying the Identity of the Natural Person:**

- 1) Verification of the identity of the natural person from the reality of the valid identity papers (*identity card, passport, driving license, military card, police card, judiciary card*) taking into consideration that the information for recognizing the identity shall include :-
  - The full name of the client (*quadruple*), nationality, permanent address, telephone numbers, if any, work address, persons authorized to deal with the account and their nationalities and any other information the bank considers necessary to obtain.
- 2) In case of another person dealing with the bank on behalf of the customer, the existence of proxy which permits him to practice that must be ascertained together with the necessity of keeping a copy thereof or an authenticated copy of it.

- 3) The necessity of recognizing the identity of the authorized persons to use the account and the proxy according to the procedures of recognizing the identity of the client stipulated in this Circular.
- 4) The bank or the financial institution must adopt the required procedures to verify the correctness of the data and information obtained from the customer including communicating with the competent authorities issuing the identity papers if doubts existed about their correctness. Also, it must be ascertained with respect to the other continuous relationship which the natural persons run with the bank or the financial institution, that they are present via the identity papers determined by the circulars of the Central Bank of Sudan in this respect and what they included of information according to the following :-

**Joint Accounts:**

- Submission of the required identity papers for each one of the partners.
- Determining the responsibility of managing the account, whether severally or jointly.

**Guardian Accounts and Executors of Wills:**

- Submission of what indicate his appointment, provided that it was issued from a competent court.
- Submission of the recommendation or guardian-ship and adherence to the conditions stated in any of them.

**Accounts of the Administrators of Inheritance:**

- Submission of the doctrinal certificate.
- Submission of the decision of the Sharia Court or the General Administrator of Inheritance which specifies a manager for the concerned inheritance.

**Employees Accounts:**

- Submission of a salary certificate from the employer.

**(C) Procedures for Recognizing and Verifying the Identity of the Legal Person:**

- 1) The data for recognizing the identity shall include :-
- 2) Name of the legal person, legal form, headquarters address, type of activity, capital, date and number of registration, names of the authorized persons to manage the account, their nationalities and numbers of their telephones, purpose from the dealing and any information the bank considers vital to obtain.

- 3) The documents denoting the existence of authorization from the legal person to the authorized natural persons to manage the account, must be obtained, in addition to the necessity of recognizing the identity of the authorized person for dealing according to the procedures for recognizing the identity of the customer stipulated in this Circular.
- 4) Obtaining names and addresses of partners. In case of public companies, a list of the names and addresses of the shareholders whose ownership exceeds (10%) of the company's capital, must be obtained.
- 5) With regard to the other continuous relationship which the legal person runs, the presence of the legal person and its legal entity must be ascertained via the required documents and what they included of information according to the following :-

**Partnership Accounts:**

- Submission of certificate of registration of the business, issued from the Business Registrar or certificate of registering the partnership if it was registered in the name of one or more of the partners.
- Submission of Article of Association authenticated and approved by the Courts Administration, indicating in it the names and addresses of the partners.
- Specifying the names of the persons authorized to sign severally or jointly and the limit of the authorization to sign individually.

**Companies Accounts:**

- Certificate of the company's registration from the Commercial Registrar and Certificate of commencing business with regard to public companies.
- Article and memorandum of association.
- Headquarters and address of the company.
- The decision of the board of directors to open the account with the concerned bank.
- The decision of the board of directors to specify the authorized persons to manage the company's accounts and the limit of their authorization.

**Government Units Accounts and Public Institutions and Organizations Accounts:**

- Approval of the competent body to which the unit belong or the general manager of the public institution or organization as the case maybe for opening the account in the concerned bank.
- Approval of the Federal Ministry of Finance or the Estate Ministry as the case maybe.
- An authorization signed by the head of the unit or the general manager as the case may be, determining the names of the persons authorized to sign on the account and the limit of their authorization.
- A copy of the law under which the government institution or organization has been established.

**Accounts of the Societies and Organizations Not Aiming at Profit (Voluntarily Societies and Organizations):**

- Submission of a registration certificate from the competent body.
- Submission of a copy of the law and Regulation governing and organizing its work.
- The decision related to the formation of the Executive Committee and appointment of the three officers approved from the Registrar of Organizations.
- A letter specifying the bank in which the account shall be opened, signed by the president or the secretary, determining the names of the persons authorized to sign on behalf of the concerned entity and the limit of their authority to use the account.

**(D) The Actual Beneficiary:**

- 1) The bank or the financial institution must request each client to sign a written declaration specifying in it the identity of the actual beneficiary from the continuous relationship or the transient transaction, provided that he shall disclose, at least, the required due diligence information related to this beneficiary for recognizing his identity.
- 2) The bank or the financial institution must recognize the identity of the actual beneficiary and shall take reasonable procedures to ascertain his identity, including depending on the data and information obtained from official documents and data, to the extent that it grows with the bank the conviction that it was aware of the identity of the actual beneficiary.

- 3) In recognizing the actual beneficiary in case of the legal person, consideration shall be given to adopt reasonable procedures to comprehend the structure of ownership and the management controlling the legal person.

**FOURTH: Cases Which Require Special Care:**

**(A) Political Exposed Persons (PEPs):**

- 1) The bank, or the financial institution, should lay down a risk management system for the individuals who are exposed to risks by reason of their work or the actual beneficiaries who belong to this category.
- 2) Approval of the high management for establishment of a relationship with these individuals must be obtained. This approval must also be obtained upon finding out that one of the clients or the actual beneficiaries became exposed to these risks.
- 3) The bank, or the financial institution, must take adequate measures for verifying the wealth sources of the clients and the actual beneficiaries exposed to the risks by virtue of their constitutional (political) positions.
- 4) The bank, or the financial institution, must follow-up, in a close and continuous manner, its transactions with these individuals.

**(B) High Risk Customers:**

The bank, or the financial institution, must classify all of its clients and products according to the degree of risk relating to Anti-Money Laundering and Combating Financing of Terrorism taking into consideration the following :-

- Character of the client and type of his business activity.
- Nature of banking service.
- The geographical location of the client or the banking operations.
- The method through which the service is rendered, including the methods reliant on the use of modern technologies.

The bank, or financial institution, is required to give special care for the high risk clients. Among these are the clients with substantial wealth who enjoy special banking treatment.

**(C) Clients who Belong to Countries Without Appropriate Systems for Anti-Money Laundering and Combating Financing of Terrorism:**

- 1) The bank, or financial institution, should give consideration for the transactions carried out with persons in countries which the Central Bank

of Sudan deems that they lack systems for combating money laundering and financing of terrorism.

- 2) If it became evident to the bank, or the financial institution, that the operations alluded to in item (1) above do not rest on clear economic justifications, the bank must take the necessary measures in order to be acquainted with the background circumstances surrounding these operations and their purposes and to register the outcome of this in its books.

**(D) Correspondent Banks:**

The bank, or the financial institution, must pay special attention when it establishes a banking relationship with a correspondent bank, taking into consideration the following :-

- 1) To seek information on the nature of activity of the correspondent bank and its reputation in the area of money laundering and financing of terrorism.
- 2) To obtain approval of the board of directors of the bank, or financial institution, for the establishment of business relationship with the correspondent bank.
- 3) To ensure that the correspondent bank is subject to an efficient and effective supervision of the supervisory authority in the home country.
- 4) To verify the availability to the correspondent bank of adequate systems for combating money laundering and financing of terrorism.
- 5) To ensure that the correspondent bank had implemented due diligence procedures regarding its customers who have the right of payment via the correspondent account and that the correspondent bank has the capacity to provide the information in relation to the customers of these transactions on demand.
- 6) Dealing with the shell banks is prohibited as well as opening of a correspondent account for any bank or any institution rendering correspondence services to shell banks.

**(E) Unusual Transactions:**

- 1) The bank, or financial institution, must give special attention to the unusual transactions and inquire, to the extent possible, about their background and their purposes. It is important that special records of these transactions should be kept irrespective of the decision adopted in respect of these transactions.
- 2) The following are considered to be among the unusual transactions :-

- The cash transaction whose value exceeds (50,000) Sudanese pounds, or its equivalent in foreign currencies. The cash transactions which are less than this limit and the evidences indicate that they are interlinked transactions, shall be considered as one cash transaction.
- The big or unusually complex transactions.
- Any other transaction of an unusual pattern without an explicit economic justification.

**(F) Other Cases:**

The bank, or financial institution, should afford special attention in the following cases :-

- 1) When opening an account for a non-resident client; along with presentation of a valid stay permit, work permit, a copy of the work contract and a salary certificate from the employer. Also, the Central Bank of Sudan circulars regarding the non-residents current accounts must be observed. Moreover, a recommendation or a confirmation of the signature from known external banks or financial institutions must be obtained.
- 2) Upon application for finance against retention of deposits.
- 3) Upon renting of trust funds.
- 4) Upon depositing of cash amounts or travelers' cheques in an existing account by a person/persons whose names do not appear in the empowerment contract concerning that account or was not among the persons who are legally mandated by the account holder for depositing funds in this account.

**FIFTH: Bank Transfers:**

**(A) Scope of Application:**

- 1) The provisions of this paragraph apply to the bank transfers, in any currency, which are transferred or received by the bank, or the financial institution, subject to the bank transfers regulations, without the violation of any commitments arising from the circular of Anti-Money Laundering and Combating Financing of Terrorism and the other valid laws and supervisory regulations in the Sudan.
- 2) To be exempted from the provisions relating to the bank transfers are the transfers emanating from transactions conducted via the use of payment or credit cards or any other similar payment methods provided that all the transfers arising from these transactions shall be linked to a distinct

reference number which permits tracing the transaction back to the orderer of the transfer.

**(B) Obligations of the Bank Issuing the Transfer:**

- 1) The bank, or financial institution, must obtain full information about the transfer orderer including: name of the transfer orderer, number of account, address, purpose of transfer, name, address and number of account (*if any*) of the beneficiary.
- 2) In case the transfer orderer has no account with the bank, the bank shall set up a system by virtue of which the transfer orderer is assigned a distinct reference number.
- 3) The bank, or financial institution, before effecting the transfer, must verify all the information relating to the sender of the transfer through formal documents and data.
- 4) The bank, or financial institution, must incorporate into the transfer data all the data referred to in para. (1) and (2) of this item.
- 5) Regarding the transfers which are sent in one package, the executing bank shall attach the account number of the transfer orderer or his distinct reference number in case he has no account, subject to the following :-
  - a) That the bank, or financial institution, should retain the complete information about the transfer orderer laid down in para. (1) and (2) in this item.
  - b) That the bank, or financial institution, should have the capacity to provide the recipient bank and the competent authority with the required information in full during three business days from the date of receiving the request for obtaining the information.
  - c) That the bank, or financial institution, should be capable of responding immediately to any order given by the competent law implementing authority obligating it to examine this information.
- 6) The bank, or financial institution, must make sure that the non-routine transfers shall not be sent in one package in the cases which might increase the risks of Anti-Money Laundering and Combating Financing of Terrorism.

**(C) Obligations of the Bank Receiving the Transfer:**

- 1) The bank, or financial institution, must set an effective system for detecting any deficiency in the information relating to the orderer of the transfer cited in item (B) ( 1 and 2 ).
- 2) The bank, or financial institution, must institute effective measures by relying on assessment of the degree of risk in dealing with the transfers on which information about the orderer of the transfer were not

completed. Of these measures is to request for information not fulfilled by the bank executing the transfer; and in case of its non-fulfillment, the bank should adopt the measures pursuant to the assessment of the degree of risk, including rejection of the transfer and notification of the Unit with that.

**(D) Obligations of the Intermediary Bank:**

- 1) If the bank, or financial institution, participated in the execution of the transfer without being the originator or recipient, it has to ensure that all the information attached to the transfer shall accompany it upon effecting the transfer.
- 2) If the bank, or financial institution, failed to keep the information attached to the transfer, for technical reasons, it should keep all the attached information intact as received, for a period of five years, irrespective of the completeness or deficiency of this information and in such a way that enables it to submit the information available to it to the recipient bank within three business days from the date of requesting for them.
- 3) If the intermediary bank has received incomplete information about the transfer orderer, then it has to notify the recipient bank when effecting the transfer.

**SIXTH: Reporting on Suspicious Transactions:**

- 1) Any bank, or financial institution, has to identify an officer to be responsible for reporting so as to communicate the suspicious cases to the Unit for Anti- Money Laundering and Combating Financing of Terrorism in the Central Bank of Sudan according to the attached reporting specimen.
- 2) If any of the bank employees suspected that the execution of any transaction relates or can be related to any crime, the employee should report this to the officer in charge of reporting.
- 3) If the officer in charge of the reporting suspected that the execution of any banking transaction or the receipt or payment of any amount relates or can be related to any crime, the employee should report this to the Unit according to the enclosed specimen, provided that all the data and copies of the documents in respect of these transactions should be attached to the specimen.
- 4) The reporting obligation, stipulated in para. (1) and (2) of this Article, applies to the transactions which were not completed by the client whenever the doubt exists that they relate or can be related to a crime.

- 5) The officer in charge of the reporting shall be responsible for providing the Unit with the data and facilitating its access to the records and information for the purposes of discharging its duties.
- 6) Disclosure is prohibited to the client or the actual beneficiary about any of the reporting measures taken with regard to suspected financial transactions or the data relating to them.

**SEVENTH: Records Keeping:**

- 1) The bank, or financial institution, must retain the records and documents relating to customers due diligence for a period of, at least, five years from the execution date of the transaction or termination of the relationship whichever is subsequent, taking into consideration Article (45) of adaptation programme (Adjustment) of Positions Project of 1994 concerning the safekeeping of documents.
- 2) The bank, or financial institution, must keep the records and testimonies supporting the continuing relationships and the banking transactions, including the original identification papers, or copies thereof, which can be acceptable to the courts according to the applicable legislations in the Sudan and for five years, at least, from the execution date of the transaction or termination of the relationship whichever is subsequent.
- 3) The bank, or financial institution, should develop an integrated information system for keeping the records and documents alluded to in items (1) and (2) above so that it can respond to the requests of the Unit and the competent authorities for obtaining any data or information in an integrated form and rapidly and, in particular, what signifies that the bank had a continuous relationship with a specific person during the previous five years together with the provision of information on the nature of this relationship.

**EIGHTH: Internal Control System:**

The bank, or financial institution, must lay down an appropriate internal system, including the policies, measures and internal regulations which should be available for Anti-Money Laundering and Combating Financing of Terrorism provided that this system should include the following :-

- 1) A clear-cut policy for Anti-Money Laundering and Combating Financing of Terrorism, approved by the board of directors or the regional manager for branches of the foreign banks and updated continuously.
- 2) Written, detailed measures for Anti-Money Laundering and Combating Financing of Terrorism which precisely define the duties and responsibilities in conformity with the circulars issued by the Central Bank of Sudan and the adopted policy in this regard.

- 3) An appropriate mechanism for verifying adherence to the circulars, policies and the set measures for Anti-Money Laundering and Combating Financing of Terrorism, taking into consideration the need for co-ordination when defining the powers and responsibilities of the internal auditor and the officer in charge of reporting.
- 4) Determination of name of the officer in charge of reporting, name of replacement in case of his absence as well as notification of the money laundering Unit in the Central Bank of Sudan in case of changing any one of them, provided that both of them have appropriate qualifications.
- 5) Determination of the domains of the officer in charge of reporting provided that these should include, at least, the following :-
  - To receive the information and reports on the unusual and suspected transactions, examine them and take the appropriate decision regarding notification of the Unit about them or to safeguard them provided that the decision to put them away should be justified.
  - To report the suspected transactions.
  - To safekeep all documents and reports received.
  - To prepare periodical reports for submission to the board of directors on the bank's efforts in the area of Anti-Money Laundering and Combating Financing of Terrorism and its proposals for upgrading them.
- 6) Determination of the powers of the officer in charge of reporting provided that they shall include at least what can enable him exercising his competences autonomously and ensure maintaining the secrecy of information which comes to him and the measures he takes. To that end, he can consult the records and data which are necessary for carrying out inspection, review of the systems and the measures set by the bank for Anti-Money Laundering and Combating Financing of Terrorism.
- 7) The bank, or financial institution, must design continuous training plans and programmes for the employees in the area of Anti-Money Laundering and Combating Financing of Terrorism, taking into consideration that these programmes include methods of money laundering, ways for detecting and reporting and ways for dealing with the suspected clients. Records shall be kept on all the training programmes which were completed during a period of not less than five years and including names of the trainees and their qualifications and the entity which conducted the training whether internally or abroad.
- 8) Design of the necessary systems for approving the clients in the light of what is available to the bank in terms of information and data.



**SPECIMEN OF REPORTING  
A SUSPICIOUS CASE**

Unit			
A) Specifics of the Reporting Entity:			
Name of Institution: .....			
.....			
.....			
Name of Branch ( <i>if any</i> ): .....			
.....			
Place of Work:.....			
Date of Reporting:.....			
B) Specifics of the Reported Person:			
Name ( <i>quadruple</i> ): .....			
.....			
.....			
Family Name: .....			
Date of Birth: .....			
Identity:.....			
Address:			
City:.....			
State: .....			
P.O. Box:.....			
Country: .....			
Profession:.....			
C) Specifics of the Company to be Reported:			
Name of Company:.....			
.....			
.....			
No. of Commercial Register: .....			
Tax Code:.....			
Type of Work:.....			
Address:			
City:.....			
State: .....			
P.O. Box:.....			
Country: .....			
Profession:.....			
D) Reasons for Suspicion:			

**\* Use extra pages if necessary.**