



**SWAP CAPTIVE INSURANCE LTD.
&
SWAP RE LTD.**

**Anti-Money Laundering /
Counter Financing Terrorism
Policy & Guidelines**

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ANTI MONEY LAUNDERING/COUNTER FINANCING TERRORISM POLICY

Table of Contents

Abbreviations	2
1.0 INTRODUCTION	3
1.1 Money Laundering	3
1.2 Terrorism Financing	3
1.3 Anti-Money Laundering/Counter Financing Terrorism (AML/CFT)	4
2.0 RISK BASED APPROACH	5
2.1 Risk Assessment	5
2.2 Risk Control and Mitigation	5
2.3 Risk Profiling	5
3.0 KNOW YOUR CUSTOMER POLICY	6
3.1 Customer Due Diligence	6
3.2 Customer Assessment	6
3.2.1 Individual Customers	7
3.2.2 Corporate Customers	7
3.3 Higher risk customers	8
3.4 POLITICALLY EXPOSED PERSON (PEPs)	8
4.0 SUSPICIOUS TRANSACTION REPORT	9
4.1 Reporting Procedures	9
5.0 COMPLIANCE PROGRAMME	10
5.1 Policies, Procedures and Controls	10
5.2 Job and responsibility	10
5.2.1 Board of directors	10
5.2.2 Senior Management	10
5.2.3 Compliance Officer	11
5.3 Employee Screening Procedure	11
5.4 Staff Training and Awareness Programmes	11
5.5 Independent Audit	12
6.0 MANAGEMENT INFORMATION SYSTEM	13
6.1 Management Information Systems	13
6.2 Internal Criteria in MIS	13
7.0 RECORD KEEPING	14
7.1 Retention Period	14
7.2 Audit Trail	14
7.3 Format	14
8.0 APPENDIX	15

Abbreviations

AML/CFT	Anti-Money Laundering and Counter-Financing of Terrorism
ML/TF	Money Laundering and Terrorism Financing
AMLA	Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001
KYC	Know you customer
BNM	Bank Negara Malaysia
Labuan FSA	Labuan Financial Services Authority
CDD	Customer Due Diligence
ECDD	Enhanced Customer Due Diligence
NRIC	National Registration Identity Card
PEP	Politically Exposed Person
FIED	Financial Intelligence and Enforcement Department
STR	Suspicious Transaction Report

1.0 INTRODUCTION

Objectives

General Information

The Anti Money Laundering/Counter Financing Terrorism Policy (hereinafter referred to as “**Policy & Guidelines**”) defines the policies and procedures for Swap Captive Insurance Ltd. and Swap Re Ltd. and its subsidiaries (collectively known as “SWAP” “Swap Asia Group” or “the Group” or “Company”). Rules (including Circulars and Letters) from the regulators shall automatically supersede the existing operating policies and procedures herein stated.

The Policy & Guidelines are applicable to the following stakeholders:

- a) Directors of Swap, both executive and non-executive, unless otherwise stated in this Policy & Guidelines;
- b) every employee within the Group; and
- c) customer, suppliers, sub-contractors, consultants, agents, representatives and others performing work or services for or on behalf of the Group.

It is the intention of Board of Directors of SWAP to ensure that these procedures serve as our commitment to prohibit Money Laundering/ Financing Terrorism in the business conduct within the Group.

1.1 Money Laundering

In general terms, money laundering is defined as the process of converting money or property, which is derived from illegal activities to give it a legitimate appearance.

1.1.1 Stages of money laundering

- Placement

The physical disposal of proceeds derived from illegal activities.

- Layering

Separating the illicit proceeds from their sources through transactions that disguise the audit trail and provide anonymity.

- Integration

Integrating the laundered proceeds into the economy as normal funds.

1.2 Terrorism Financing

Financing of terrorism generally refers to carrying out transactions involving funds that may or may not be owned by terrorist, or that have been, or are intended to be, used to assist the commission of terrorism. It also has three stages similarly to money laundering which is raising, moving, and using funds.

1.3 **Anti-Money Laundering/Counter Financing Terrorism (AML/CFT) Act**

The enactment of Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Acts 2001 (AMLA) used to identify any person who intended to commit money laundering as stated in:

Paragraph 4(1) of the AMLA

- a) engages directly or indirectly, in a transaction that involves;
- b) acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes of, or uses;
- c) removes from, or brings into Malaysia; OR
- d) conceals, disguises, or impedes the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership.

2.0 RISK BASED APPROACH

The application of Risk Based Approach is an important method to control risk in money laundering and financing terrorism to identify, assess and understand the ML/TF risks.

2.1 Risk Assessment

Swap to conduct appropriate steps to identify, assess and understand ML/TF risks in relation to customer, product or services, country, and criminal activities.

- a) Documenting risk assessment and findings
- b) Consider all relevant risk factors before determining the overall level of risk and the appropriate level and type of mitigation to be used
- c) Ensure evaluation reviews are always up to date through periodic checks
- d) Implement appropriate mechanisms to provide risk assessment information to supervisory authorities.

2.2 Risk Control and Mitigation

2.2.1 Swap's implementation are as follows: -

- a) Policies, control, and procedures approved by Board of Directors and Senior Management to manage and mitigate risk
- b) Monitor implementation of those controls and enhance them if necessary
- c) Enhance measures to manage and mitigate higher risk identified

2.3 Risk Profiling

In creating the risk profile of a particular customer or type of customer, Swap shall identify and assess risk of customers during establishment of business relation. Swap ensures measures are implemented commensurate with risk profile of a customer taking into account the following factors:

- a) the origin of the customer and location of business
- b) background or profile of the customer
- c) nature of the customer's business
- d) structure of ownership for a customer
- e) any other information suggesting that the customer is of higher risk.

2.3.1 Following the initial acceptance of the customer/vendor, Swap shall continuously monitor and update each customer's profile.

3.0 KNOW YOUR CUSTOMER POLICY

Swap has developed Know Your Customer Policy to identify and assess risk of customers when establishing business relationship is aligned with the Labuan FSA guidelines. It is also designed to protect financial institutions from customer associated with high risk of money laundering and terrorist financing.

3.1 Customer Due Diligence

Customer Due Diligence (CDD) should be conducted when:

- a) establishing business relationship with any customer
- b) carrying out cash transaction
- c) it has any suspicion of money laundering or financing of terrorism
- d) it has any doubt about the veracity or adequacy of previously obtained information

3.1.1 Classification of Customer Due Diligence

3.1.1.1 Standard CDD measure

Individual customer and beneficial owner of a company i.e., people behind the transaction

3.1.1.2 Standard CDD measure

Swap to conduct simplified CDD where ML/TF risks are assessed to be low except where there are instances of higher risks or suspicion of ML/TF.

3.1.1.3 Enhanced CDD

Swap to perform enhanced CDD where the ML/TF risks are assessed as higher risk.

3.2 Customer Assessment

The process of identifying and verification customer/vendor includes:

- a) the identity of the customer
- b) the identity of beneficial owner
- c) the identity of person conducting transaction if the transaction is done on behalf of someone else or the person you are dealing with is a representative appointed by a legal person
- d) the purpose i.e., why the transaction is undertaken

3.2.1 Individual Customers

Customers are required to provide details to enable Swap doing the necessary assessment through the information given. The person record includes the following information.

- a) Full name
- b) National Registration Identity Card (NRIC) / passport number / reference number of any other official document
- c) Residential and mailing address
- d) Date of birth
- e) Nationality
- f) Occupation type
- g) Name of employer or nature of self-employment or nature of business
- h) Contact number (home, office or mobile)

3.2.2 Corporate Customers

Corporate customers are required to provide details of the company/business to furnish the original and make a copy each of the following documents:

- a) Company / Business name
- b) Business registration number
- c) Powers that regulate and bind the customer, as well as person having senior management position
- d) Business address / registered address
- e) Nature of business
- f) Directors and shareholders / beneficial owners' details
- g) Person authorised to represent the company or business.

3.2.3 Exemption Provision

SWAP is exempted from obtaining a copy of constituent documents and from verifying the identity of directors and shareholders of the customer (legal person) which fall under the following categories:

- a) Public listed companies or corporations listed in Labuan International Financial Exchange and Bursa Malaysia;
- b) Foreign public listed companies:
 - i. listed in recognised exchanges; and
 - ii. not listed in higher risk countries;
- c) financial institutions that are not from higher risk countries;
- d) any person that has been licensed or approved by Labuan FSA under LFSSA and LIFFSA;
- e) licensed entities under the Financial Services Act 2013 (FSA) and Islamic Financial Services Act 2013 (IFSA);
- f) persons licensed or registered under the Capital Markets and Services Act 2007;
- g) prescribed institutions under the Development Financial Institutions Act 2002 (DFIA); or
- h) licensed entities under the Money Services Business Act 2011 (MSBA).

Notwithstanding the above, SWAP is required to identify and maintain the information relating to the identity of the directors and shareholders of the customer (legal persons) either; through a public register, other reliable sources or based on information provided by the customer.

3.3 Higher risk customers

3.3.1 For higher risk customers, Swap shall conduct enhanced customer due diligence.

3.3.2 Enhanced due diligence includes at least:

- a) additional detailed information from the customer and through publicly available information on the purpose of transaction and source of funds.
- b) additional approvals from the Senior Management before establishing the business relationship with the customer.

3.3.3 Examples of higher risk customers are:

- a) High net worth individuals
- b) Non-resident customers
- c) Locations known for their high rates of crime (for example, drug producing, trafficking, smuggling)
- d) Countries or jurisdictions with inadequate AML/CFT laws and regulations
- e) PEPs
- f) Legal arrangements that are complex – (for example, trust, nominee);
- g) Cash based businesses
- h) Unregulated industries

3.4 POLITICALLY EXPOSED PERSON

Swap shall take reasonable steps to determine whether customer are domestic PEPs, or someone entrusted with key functions by an international organization. If the customer is assessed as a domestic PEPs or a person entrusted with a key function by an international organization, Swap shall assess the level of ML/TF risk that may arise because of the relationship implemented with those PEPs.

Foreign or Domestic PEPs are individuals entrusted with prominent public function.

- a) Head of State Government
- b) Senior Politician
- c) Senior Government
- d) Judiciary / Military Officials
- e) Senior Executives of State-owned corporation and important political party officials including family members and associate.

4.0 SUSPICIOUS TRANSACTION REPORT

Following are the criteria described for suspicious transaction that exceeds USD1,000 which should be reported to FIED, Bank Negara Malaysia and AML Policy Unit Labuan FSA: -

- a) appears unusual
- b) has no clear economic purpose
- c) appears illegal
- d) involves proceeds from an unlawful activity or instrumentalities of an offence
- e) indicates that the customer is involved in ML/TF

4.1 Reporting Procedures

- 4.1.1** Compliance officer responsible for the submission of suspicious transaction reports to the Financial Intelligence Unit in Bank Negara Malaysia and ML Policy Unit Labuan FSA. The appointed compliance officer is the single point of reference for the Financial Intelligence Unit in Bank Negara Malaysia and Labuan FSA with regards to AML/CFT matters.
- 4.1.2** Upon receiving any internal suspicious transaction report, the compliance officer shall evaluate the grounds for suspicion and if suspicion is confirmed, promptly submits the suspicious transaction report to the Financial Intelligence Unit in Bank Negara Malaysia and Labuan FSA. In the case where the compliance officer decides that there are no reasonable grounds for suspicion, he should document his decision, ensure it is supported by the relevant documents and file the report.
- 4.1.3** The compliance officer shall ensure that the suspicious transaction report is submitted within the next working day, from the date the compliance officer establishes the suspicion. While submitting the suspicious transaction report, utmost care must be undertaken to ensure that such reports are treated with the highest level of confidentiality. Hence, the compliance officer must be given the independence to report suspicious transactions to the Financial Intelligence Unit in Bank Negara or Labuan FSA Malaysia without the need to go through any elaborate approval process.
- 4.1.4** The compliance officer is authorised to cooperate with the Financial Intelligence Unit in Bank Negara Malaysia and Labuan FSA in providing such additional information and documentation as it may request and to respond promptly to any further enquiries with regards to any suspicious transaction report.
- 4.1.5** The suspicious transaction reporting mechanism shall be operated in a secured environment to maintain confidentiality and preservation of secrecy.

5.0 COMPLIANCE PROGRAMME

5.1 Policies, Procedures and Controls

5.1.1 Swap's Policies, procedures and controls related to AML/CFT is in line with the risks and transactions carried out.

5.1.2 This Policy contains policies regarding customer due diligence, record keeping, management information systems, compliance programs and suspicious transaction reporting.

5.2 Job and responsibility

5.2.1 Board of directors

It is the responsibility of Swap's Board of Directors to: -

- a) Ensure that overall measures are taken to prevent Swap from business transactions that are relating to Money Laundering and Terrorism Financing;
- b) To monitor steps and implementation AML/CFT at Swap, the Board of Directors shall give that authority to the Senior Management and Audit Committee;
- c) Approve the Policy related to AML/CFT and ensure that the Policy is constantly updated and implemented effectively;
- d) Ensure audit inspections are carried out periodically to ensure program effectiveness and compliance AML/CFT in Swap;
- e) Be aware of ML/TF risks related to the strategy business, delivery channels and geographic coverage business products and services; and
- f) Understand the AML/CFT measures required by laws including AMLA, subsidiary laws and guidelines issued under Labuan FSA, industry standards and best practices and the importance of implementing AML/CFT measures to prevent Swap from being terrorism financing.

5.2.2 Senior Management

Senior Management is responsible to: -

- a) Develop, update, and implement Policies, guidelines and procedures related to AML/CFT effectively;
- b) Always reporting the latest developments about AML/CFT to the Board of Directors and Risk Management Committee;
- c) Provide communication channels to convey Policies and procedures about AML/CFT to all levels of Swap employees; and
- d) Paying attention to and understanding the risks of ML/TF related to business strategy, delivery channels and geographic coverage of business products and services offered and including new products offered, new delivery channels and new geographic coverage.

5.2.3 Compliance Officer

5.2.3.1 The compliance officer shall ensure the following:

- a) Compliance with the AML/CFT requirements
- b) Implementation of the AML/CFT guideline
- c) The appropriate AML/CFT procedures, including Know Your Customer Policy, customer due diligence, record-keeping, ongoing monitoring, reporting of suspicious transactions and combating the financing of terrorism are implemented effectively
- d) The AML/CFT mechanism is regularly assessed to ensure that it is effective and sufficient to address any changes in money laundering and financing of terrorism trend
- e) The channel of communication from the respective employees to the compliance officer is secured and that information is kept confidential
- f) Relevant employees are aware AML/CFT measures, including guideline, control mechanism and the channel of reporting

5.3 Employee Screening Procedure

5.3.1 The screening procedure of Swap employee must be carried out during the recruitment.

5.4 Staff Training and Awareness Programmes

5.4.1 Swap shall conduct awareness programmes on AML/CFT practices and measures for its employees, who is in charge of processing and accepting new customer or vendor as well as staff responsible to monitor transactions.

5.4.2 The Senior Management shall ensure that proper channel of communication is in place to effectively communicate to all levels of employees this Policy & Guidelines. The employees shall be made aware that they may be held personally liable for any failure to observe the internal AML/CFT requirements.

5.4.3 In this regard, Swap shall make available its AML/CFT measures for all employees and its documented AML/CFT measures shall contain the following:

- a) The relevant guideline on AML/CFT issued by Bank Negara Malaysia and Labuan FSA.
- b) Swap's internal AML/CFT guideline.

5.4.4 Jimmy Chan (Jimmy.Chan@swap-asia.com) shall be the compliance officer who is responsible to ensure Swap is in compliance to this Policy.

5.5 Independent Audit

- 5.5.1.** The Management is responsible for ensuring regular independent audit of the internal AML/CFT measures to determine their effectiveness and compliance with the AMLA, the AMLA Regulations, and the relevant guideline on AML/CFT issued by Bank Negara Malaysia as well as the requirements of the relevant laws and regulations of other supervisory authority, if any.
- 5.5.2.** The roles and responsibilities of the auditor are clearly defined and documented. The roles and responsibilities of the auditor includes:
- a) checking and testing the compliance with, and effectiveness of, the AML/CFT guideline, procedures, and controls
 - b) assessing whether current measures are in line with the latest developments and changes of the relevant AML/CFT requirements.

6.0 MANAGEMENT INFORMATION SYSTEM

6.1 Management Information Systems

6.1.1 Swap will ensure that the Management Information System (MIS) can be used to provide up-to-date and accurate information in helping to carry out the CDD or ECDD process or to detect any suspicious activity.

6.1.2 The MIS shall include, at a minimum, information on aggregate transactions in each period, large transactions, inconsistencies in transaction patterns, risk profiles of depositors and transactions exceeding any limits set internally.

6.2 Internal Criteria In MIS

Swap will develop internal criteria (red flags) for detect any suspicious activity. If any transaction matches this list of internal criteria, Swap will carry out the ECDD process and continuous monitoring of this transaction. Sending a Suspicious Transaction Report (STR) can also be considered based on this case.

7.0 RECORD KEEPING

7.1 Retention Period

7.1.1 Swap shall keep transaction records and documents, especially those related to the CDD process for seven years from the date the transaction is completed or the transaction with the depositor has ended.

7.1.2 Swap shall keep relevant records in a form that can be certified as evidence in court and accessible to supervisors of authorities and law enforcement agencies in a timely manner.

7.1.3 If relevant records are subject to investigation or prosecution in court, such records shall be kept beyond the prescribed period until after obtaining written permission from the relevant law enforcement authorities that the records are no longer required.

7.2 Audit Trail

Swap shall ensure that the records and documents stored are sufficient so that an audit trail can be obtained by BNM or Labuan FSA and any enforcement agency.

7.3 Format

Swap shall ensure that records and documents kept is in an acceptable format under Section 3 of the Evidence Act 1950. Swap shall ensure that the records and documents stored are in a safe condition and can be taken back, on demand, on time.

8.0 APPENDIX

- 8.1** Know your client/Customer Due Diligence Form
- 8.2** Customer Identification Form
- 8.3** Supporting Document
- 8.4** Suspicious Clients / Transactions Recognition & Reporting Procedures
- 8.5** "Suspicious Activity Report" Form (SAR)
- 8.6** Annual Fit and Proper Declaration Form

KNOW YOUR CUSTOMER (KYC) DUE DILIGENCE QUESTIONNAIRE		
SECTION 1: IDENTIFICATION DETAILS OF YOUR COMPANY		
Registered Name		
Type of license		
Registered office		
Registration number of the company		
Registered office address		
Street		No:
Place		Country:
Management office address	(only if different from above)	
Street		No:
Place		Country:
Other countries of operations (Includes Kuala Lumpur Marketing Office/Co-location office/Johor Marketing Office)		
Mailing address	Building name	P.O.Box:
Street		No:
Place		Country:
Contact details	Telephone	
	Fax	
	Email	
	Website	
Company Status (operating in Malaysia and/or overseas)		
City and Country of incorporation		
Date of incorporation		
Name of regulator		
Regulatory status	Independent Regulator <input type="checkbox"/> Unregulated <input type="checkbox"/> Non-Independent Regulator <input type="checkbox"/>	

Principal business/activity	
Purpose and nature of transaction to be undertaken	
Are you acting on behalf of another person?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Name of beneficial owner	
If it's a company, please supply registration no	
If it's Beneficial owner is a person, please supply nationality	
Is the beneficial owner a Politically exposed person (PEP)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
	Function:

SECTION 2: LIST OF BOARD MEMBERS/DIRECTORS OF THE COMPANY		
No.	Name Director	Position
1		
2		
3		
4		
5		
6		
7		

SECTION 3: LIST OF SHAREHOLDERS OF THE COMPANY			
Is the company publicly listed?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Name exchange			
Share capital			
No.	Name Shareholder	% Shares	Name of Individual (s) controlling the Shareholder
1			
2			
3			
4			
5			

SECTION 4: ANTI MONEY LAUNDERING AND COUNTER FINANCING OF TERRORISM		
Do the entire operations of your institution are subject to regulations including Anti money Laundering by Financial Services Regulator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have policy and procedures for prevention of money laundering and terrorist financing?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Have you implemented processes for the identification and "Know Your Customers" information of customers on whose behalf you maintain or operates relationships or conducts transactions?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you screen customers and transactions against list of persons, entities or countries issued by government/competent authorities on AML and sanctions?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do the regulations is your country require reporting any suspicious transactions to law enforcement agencies or financial services regulator?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have an AML and Sanctions Compliance Officer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes:		
	Name:	
	E-mail:	
	Phone:	
Describe how AML/CFT fits into your organisational structure (i.e. part of compliance, legal, risk management, operations, security)		

SECTION 5: DECLARATION SECTION	
<p>We confirm that all the assets/funds to be placed or settled upon advice/arrangements by you have been lawfully acquired and are not derived from, either directly or indirectly, or otherwise connected with any criminal or unlawful activity.</p> <p>We declare that the above-mentioned information is true and correct to the best of our knowledge and it has been made in good faith.</p> <p>We accept that you will rely on this information to fulfil all of its regulatory requirements.</p>	
Name:	Name:
Date:	Date:
Signature:	Signature:

CUSTOMER IDENTIFICATION FORM (CIF)

A. Personal Details

Full Name:	
NRIC No.:	
Passport No.:	
Issuing Authority:	
Date & Place of Issue:	
Nationality:	
Gender:	
Marital Status:	
Date of Birth:	
Place of Birth:	
Present Residential Address: (Please provide certified true copy of evidence of residential address, e.g., utility bill, telephone bill, bank statement)	
Present Office Address:	
Contact Information: - Office Tel No: House Tel No: Mobile Tel No: Email Address:	
Present position held / name of company	

Position held in other companies (please specify)	
Political Office(s) Held [including office(s) in political societies]	
Legal Status: -	<input type="checkbox"/> Beneficial Owner <input type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Authorised Representative
Source of Wealth/Source of funds	
Have you ever been convicted of any offences (except for minor traffic offences)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:
Have you ever been sanctioned by any professional or regulatory bodies?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:
Have you ever been adjudged bankrupt or insolvent?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:
Do you have any ties with politically exposed persons?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:
In carrying out your duties/responsibilities, will you be acting on the direction or instructions of other party?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details:

I confirm that all information in this return is true and complete, and I undertake to promptly notify Labuan Insurance Management Services Ltd of any changes to or affecting the accuracy of the above information. I also hereby declare that I have been made aware and understand the laws and requirements of the Labuan Companies Act 1990, licensing requirements under the Labuan Financial Services and Securities Act 2010 and any other relevant Acts in Labuan, particularly the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001.

Signature

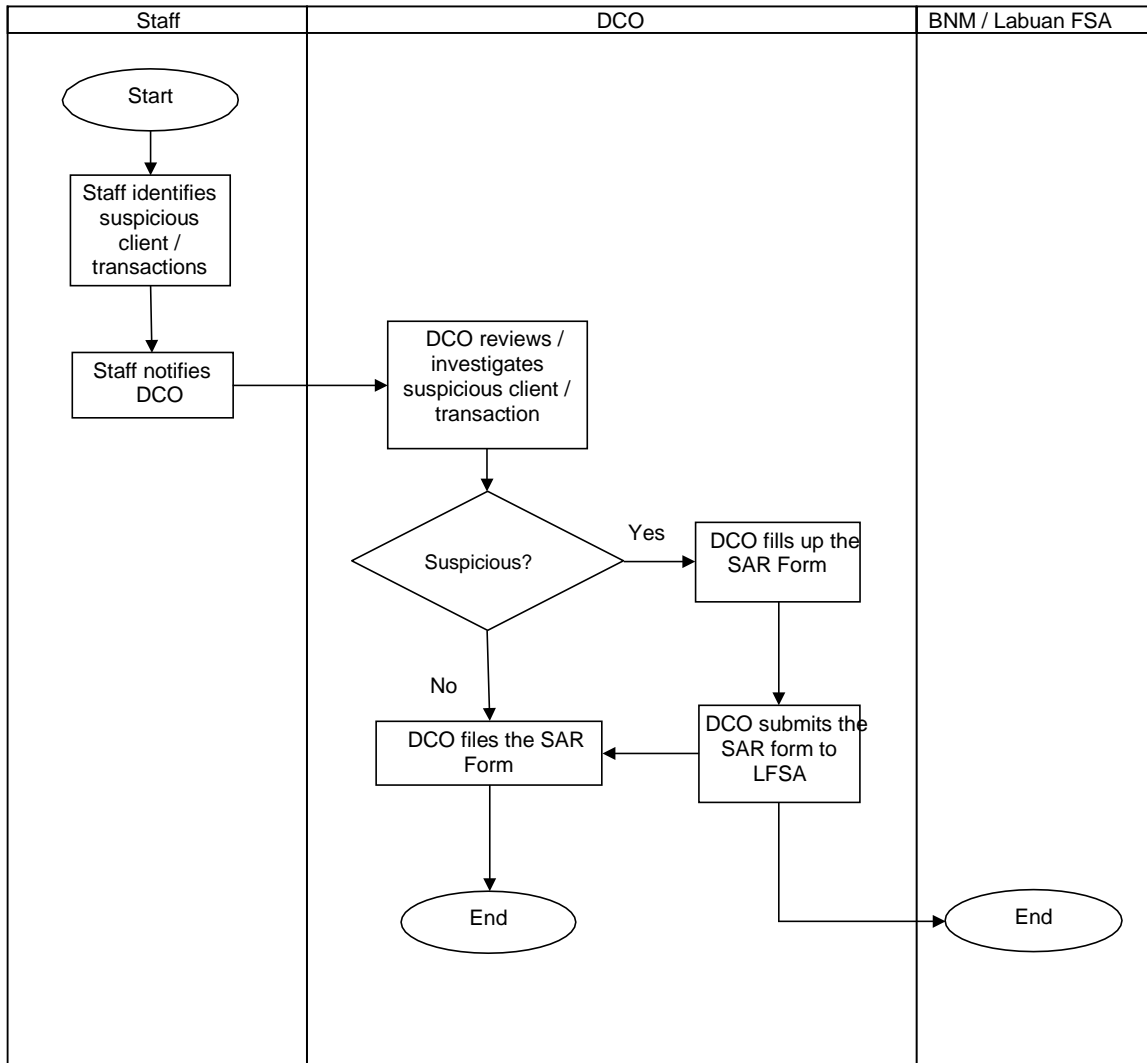
Date:

Note: If space provided is insufficient, provide such details as attachment. Please sign on each page including attachment.

Appendix 8.3

8.3 SUPPORTING DOCUMENTS		
1. Natural Person		
<i>(Directors, Principal Officer, Individual Shareholder, UBO, Authorised Persons)</i>		
(a)	Certified true copy of NRIC / valid Passport	
(b)	Certified true copy of Proof of Residential Address (not older than 3 months) i.e. Utility bill, bank statement	
(c)	Completed Customer Identification Form (CIF Form) (see Appendix I)	
(d)	Latest Curriculum Vitae	
2. Corporate shareholder		
(a)	Certified true copy of Certificate of Incorporation	
(b)	Certified true copy of Certificate of Change of Name (if any)	
(c)	Certified true copy of Register of Directors	
(d)	Certified true copy of Registered office address and Place of Business	
(e)	Certified true copy of Register of members	
(f)	Certified true copy of Memorandum and Articles of Association	
(g)	Diagram of shareholder structure (with percentage indicator)	
3. Applicant		
(a)	Certified true copy of Certificate of Incorporation	
(b)	Certified true copy of Certificate of Change of Name (if any)	
(c)	Certified true copy of Register of Directors	
(d)	Certified true copy of Registered office address and Place of Business	
(e)	Certified true copy of Register of members	
(f)	Certified true copy of Memorandum and Articles of Association	
(g)	Organisation chart	
(h)	Annual Reports and Audited Financial Statements of the company and holding company for the past 3 years	

Suspicious Clients / Transactions Recognition & Reporting Procedures



"Suspicious Activity Report" Form

A. Suspect Information

1. Name (s)
(Include all aliases / commonly used names. If organisation, please provide registered business / organisation name)s

2. NRIC / Passport

3. Business Registration no

4. Nationality

5. Occupation / Business

6. Address

7. Relationship with MNIO

B. Beneficiary Information

8. Beneficiary
(Include all aliases / commonly used names. If organisation, please provide registered business / organisation names)

9. NRIC / Passport

10. Business Registration no

11. Nationality

12. Occupation / Business

13. Address

14. Relationship to Suspect

15. Name

16. Designation

17. Department

18. Date of reporting

C. Preparer Information

"Suspicious Activity Report" Form

D. Suspicious Activity Information

19. Date of transaction

20. Provide a chronological and complete account of the possible violation of law, including what is unusual, irregular or suspicious about the transaction. Continue the narrative on a duplicate of this page if necessary

ANNUAL FIT & PROPER DECLARATION FORM

Name of Employee		
Employee No.		

Please mark "X" in the appropriate column and provide details if your answer is "YES".

		YES	NO
1	Have you been adjudged as a bankrupt, or having suspended payments, or having compounded with your creditors, whether in or outside Malaysia?		
2	Have you been charged for a criminal offence under any written law involving fraud or dishonesty in any court of law whether in or outside Malaysia?		
3	Have you been sentenced under an order of detention, supervision, restricted residence, banishment, or deportation under any prevailing laws whether in or outside Malaysia?		
4	Have you been compounded or convicted or have caused the Company to be compounded or convicted of an offence under any written law whether in or outside Malaysia?		
5	Have you held a position of responsibility in the management of any company which has been convicted of an offence under any written law or has defaulted in payment of any judgment sum against it, or has suspended payment or has been compounded with its creditors whether in or outside Malaysia?		
6	Do you currently have pecuniary interest, direct or indirect, in a matter and that interest raises a conflict with the performance of your duties in relation to that matter?		
7	Are you currently involved in any venture, dealing or business activity either on your own or partnership or with some other person or persons without prior written approval from the Company?		
8	Are you currently involved in a part time employment or other business activity outside the Company's working hours without the written approval from the Company?		
9	Do you currently hold a position and serve as director of another corporation not associated with the Company without the written approval from the Company?		
10	Do you currently hold a position as executor, administrator, or trustee for customer/client's estate?		

Details in response to Question 1 to 10 above.

Q no. _____

Q no.

I hereby declare and confirm that all the information given by me as above is true and correct. I understand and agree that any false information given by me in this Form is a serious offence under the Company rules and regulations and appropriate disciplinary action, including termination of service, may be taken against me.

Verified by,

Employee's Signature
Date:

Principal Officer
Date: