



REPUBLIC OF KENYA

FINANCIAL REPORTING CENTRE

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ANNUAL COMPLIANCE REPORTING TEMPLATE FOR REPORTING INSTITUTIONS (Ver. 7)

Pursuant to Regulation 44 of the Proceeds of Crime and Anti-Money Laundering Regulations, 2023.

Name of Reporting Institution: _____

FRC Registration Code: _____

Reporting Year: _____

Instructions:

1. Please complete the form below by entering one of **C**, **D**, or **N** in column 5 for each of the rows. Where a regulation has not been complied with, enter reason for non-compliance in column 6 of the respective row. You may use additional sheets if the explanation is lengthy.
2. Print, sign, stamp and scan the document into a **PDF** file.
3. Name both the Word and PDF files as **ACR/<Report Year>/<Reporting Institution>**. For example, **Export Bank** will have the following two files for the year 2024 compliance report: **ACR/2024/Export Bank.docx** and **ACR/2024/Export Bank.pdf**.
4. Send both files as attachments to FRC through goAML Message Board with the subject being similar to the file names for example **ACR/2024/Export Bank**.

Signature and Stamp (Reporting Institution) _____

Section A

No	Regulation	Reference in Regulations	Description of regulatory requirement (To be read together with The Proceeds of Crime and Anti-Money Laundering Act 2009, and The Proceeds of Crime and Anti-Money Laundering Regulations 2023 (POCAML Regulations))	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If ' Did Not Comply ', state reason for non-compliance. Use separate sheet(s) where necessary.
1.	5. Registration with the Centre	5. (1)	The institution has registered with the Centre within such time and manner as the Centre may specify.		
2.		5. (3)	The institution has notified the Centre, in writing, of any changes to the particulars furnished during registration and under POCAML Regulations within ninety days after such change		
3.	7. Risk Assessment	7. (1)	The institution has undertaken a risk assessment to enable it identify, assess, understand, monitor, manage and mitigate the risks associated with money laundering, terrorism financing and proliferation financing.		
4.		7. (2)	In undertaking the risk assessment, the institution has— a) documented its risk assessments; b) considered all the relevant risk factors including customers, countries or geographical areas, products, services, transactions or delivery channels, before determining what is the level of overall risk and the appropriate level and type of mitigation to be applied; c) kept these assessments up to date; and d) has appropriate mechanisms to provide risk assessment information to competent authorities and Self-Regulatory Bodies.		
5.		7. (3)	On the basis of the results of the assessment, the institution has developed and implemented Board approved policies, controls and procedures that will enable it to effectively manage and mitigate the identified risks.		
6.		7. (4)	The institution has put in place procedures and mechanisms for monitoring implementation of the controls and enhance them, where necessary.		
7.		7. (5)	The institution has put in place mechanisms to update its risk assessment policies or programs regularly but at least once every two years taking into account changes such as the entry of the institution into new markets and the introduction of new products and services.		
8.	8. New Technologies	8. (1)	The institution has taken reasonable measures to prevent the use of new technologies for money laundering, terrorism financing and proliferation financing purposes.		

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9.		8. (2)	The institution has conducted a money laundering, terrorism financing and proliferation financing risk assessment: (a) prior to the introduction of a new product, new business practice or new technology for both new and pre-existing products; (b) so as to assess money laundering, terrorism financing and proliferation financing risks in relation to— (i) a new product and a new business practice, including a new delivery mechanism; and (ii) new or developing technologies for both new and pre-existing products.		
10.		8. (3)	The institution has taken appropriate measures to manage and mitigate the risks.		
11.		8. (4)	The institution has documented the outcome of the risk assessment and has put in place mechanisms to availed to the Centre or to the supervisory body upon request.		
12.	9. Policies and procedures	9. (1)	The institution has policies and procedures to address any money laundering, terrorism financing or proliferation financing risks associated with non-face-to-face business relationships or transactions.		
13.		9. (2)	The institution has applied policies and procedures to address any money laundering, terrorism financing or proliferation financing risks when establishing customer relationships and when conducting on-going due diligence.		
14.	10. Cross border conveyance of monetary instruments	10. (1)	The institution has declare the particulars of monetary instruments to a customs officer at the port of entry or exit in the form prescribed in the Schedule before conveying into or out of Kenya monetary instruments equivalent to or exceeding US\$10,000 or its equivalent in Kenya shillings or any other currency.		
15.	11. Internal Control Obligations	11.	The institution has formulated, adopted and implemented internal control measures and other procedures to combat money laundering and these measures include:		
16.		11. (a)	compliance management arrangements (including the appointment of a money laundering reporting officer at the management level)		
17.		11. (b)	screening procedures to ensure high standards when hiring employees		
18.		11. (c)	an ongoing employee training programme		

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19.		11. (d)	an independent audit function to test the system		
20.		11. (e)	programmes for assessing risks relating to money laundering, terrorism financing and proliferation financing		
21.		11. (f)	a control policy covering issues of timing, degree of control, areas to be controlled, responsibilities and follow-up		
22.		11. (g)	monitoring programmes in relation to complex, unusual or large transactions or suspicious activities		
23.		11. (h)	enhanced due diligence procedures with respect to persons and business relations and transactions carrying high risk and with persons established in jurisdictions that do not have adequate systems in place to combat money laundering, terrorism financing and proliferation financing		
24.		11. (i)	making employees aware of the procedures under the Act, these Regulations or directives, codes and guidelines issued thereunder or and any other relevant policies that is adopted by the reporting institution		
25.		11. (j)	establishing and maintaining a manual of compliance procedures in relation to anti-money laundering, terrorism financing and proliferation financing		
26.		11. (k)	providing for the necessary processes and working methods to ensure compliance with the Act, Regulations and the internal rules		
27.		11. (l)	providing for the responsibility of the management of the institution in respect of compliance with the Act, Regulations and the internal rules		
28.	12. Money Laundering Reporting Officer	12. (1)	The institution has appointed a Money Laundering Reporting Officer.		
29.		12. (2)	The Money Laundering Reporting Officer is of management level and has relevant and necessary competence, authority and independence.		
30.		12. (3)	The appointment or removal of the Money Laundering Reporting Officer was communicated to the Centre and the institution's supervisory body within fourteen days of the appointment or removal.		

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31.		12. (4)	The Money Laundering Reporting Officer is not an Internal Auditor or the Chief Executive except in the circumstances where the Chief Executive is a sole proprietor.		
32.		12. (5)	All staff in the institution monitored and reported to the Money Laundering Reporting Officer any suspicious activity on money laundering, terrorism financing and proliferation financing.		
33.		12. (6)	The Money Laundering Reporting Officer reported forthwith to the Centre any transaction or activity that he had reason to believe was suspicious in the manner specified by the Centre.		
34.		12. (7) a	The Money Laundering Reporting Officer ensured that he was informed of all suspicious activities available to the institution and took action on suspicious disclosures from officers and employees of the institution as soon as was practical so as not to delay the reporting of such disclosures.		
35.		12. (7) b	The Money Laundering Reporting Officer ensured that where a disclosure was made, he applied internal risk management procedures on a suspicious transaction.		
36.		12. (7) c	The Money Laundering Reporting Officer reported disclosures deemed suspicious to the Centre in the manner provided in the Regulations.		
37.		12. (7) d	The Money Laundering Reporting Officer ensured that officers and employees of the institution were made aware of the Proceeds of Crime and Anti-Money Laundering Act as well as the audit systems adopted by the institution.		
38.		12. (7) e	The Money Laundering Reporting Officer in liaison with the institution's human resource department ensured that persons were screened before being hired as employees.		
39.	11. Anonymous or Fictitious Accounts	13. (1)	The institution did not open or maintain an anonymous or fictitious account.		
40.		13. (2)	The institution, at the time of establishing a business relationship, took reasonable measures to determine whether the applicant for business was acting on his own behalf or on behalf of a third party.		

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41.		13. (3)	In determining what constitutes reasonable measures for the purpose of regulation 13 (2), all the circumstances of the case were taken into account and in particular, regard was given to any guideline or code applicable to the institution and, in the absence of any guideline or code, to best practice which, for the time, was followed in the relevant field of business and which was applicable to those circumstances.		
42.		13. (4)	The institution did not establish or maintain a business relationship or conduct any transaction with a customer who was entering into a business relationship or conducting any transaction under a false name.		
43.	14. Customer Due Diligence	14. (1)	The institution undertook customer due diligence		
44.		14. (2) a	The institution, in undertaking customer due diligence, identified the customer whether permanent or occasional and verified that customer's identity using reliable, independent source documents, data or information.		
45.		14. (2) b	The institution, in undertaking customer due diligence, identified the beneficial owner, and took reasonable measures to verify the identity of the beneficial owner, such that the institution was satisfied that it knew who the beneficial owner was and it understood the ownership and control structure of the customer in case of legal persons and arrangements		
46.		14. (2) c	The institution, in undertaking customer due diligence, understood and, as appropriate, obtained information on the purpose and intended nature of the business relationship		
47.		14. (2) d	The institution, in undertaking customer due diligence, conducted on going due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions conducted were consistent with the institution's knowledge of the customer, their business and risk profile, including where necessary, the source of funds		
48.		14. (3)	The institution took measures to satisfy itself as to the true identity of any applicant seeking to enter into a business relationship with it, or to carry out a transaction or series of transactions with it, by requiring the applicant to produce an official record for the purposes of establishing the true identity of the applicant and for the purpose of verifying that identity.		

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49.		14. (4)	The institution, in the circumstances set out in regulation 14 (3), established and verified in accordance with the Regulations, the particulars listed in regulation 14 (4) of the Regulations regarding the applicant for Business.		
50.		14. (5)	The circumstances under 14 (3) were carried out in any of the instances listed in regulation 14 (5) of the Regulations.		
51.		14. (6)	The institution applied customer due diligence requirements to existing customers or clients on the basis of materiality and risk, and conducted due diligence on such existing relationships at appropriate times, taking into account whether and when customer due diligence measures had previously been undertaken and the adequacy of data obtained		
52.	15. Information on natural persons	15. (1)	Where the institution sought to establish the identity of a natural person, it in addition to the requirements set out in section 45 (1) (a) of the Act, requested for full names of the person and any other particulars prescribed by the Centre.		
53.		15. (2)	Additional measures listed in regulation 15(2) of the POCAML Regulations were used to identify and verify the identity of the customer.		
54.	16. Information on legal persons	16. (1)	Where the institution sought to establish the identity of a legal person or other body corporate, it in addition to the requirements set out in section 45 (1) (b) of the Act, requested the items listed in regulation 16 (1) of the Regulations in relation to such person.		
55.		16. (2)	The institution identified and took reasonable measures to verify the identity of beneficial owners through the information listed in regulation 16 (2) of the Regulations.		
56.	17. Information on partnership	17	Where the institution sought to establish the identity of partnerships, it obtained the particulars listed in regulation 17 of the POCAML Regulations.		
57.	18. Information on trusts	18. (1)	In relation to trusts, the institution identified and verified the identity of: <ul style="list-style-type: none"> (a) any applicant who sought to enter into a business relationship with it or to carry out a transaction or series of transactions with it; or (b) a customer whether permanent or occasional, by taking reasonable measures to establish the true identity of that person by requiring the applicant or customer to produce an official record reasonably capable of establishing the true identity of the applicant or customer 		

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58.		18. (2)	Where the institution sought to establish the identity of a trust, it obtained the particulars listed in regulation 18 (2) of the Regulations.		
59.		18. (3)	The trustee of a trust disclosed his or her status as a trustee to the institution when forming a business relationship or carrying out an occasional transaction.		
60.		18. (4)	The institution identified and took reasonable measures to verify the identity of beneficial owners through the information listed in regulation 18 (4) of the POCAML Regulations.		
61.	19. Information on Eligible introducers	19. (1)	Where an applicant for business was introduced to the institution by an eligible introducer or a group introducer, the institution acted in compliance with the requirements listed in regulation 19 of the POCAML Regulations.		
62.	20. Enhanced due diligence measures	20 (1)	Enhanced due diligence measures were applied to persons and entities that presented a higher risk to the institution through the measures listed in regulation 18 of the Regulations.		
63.		20. (2)	Where higher risks were identified, either at national, sectoral or institutional level, the institution addressed such risks through measures listed in regulation 20 (2) of the Regulations.		
64.		20. (3)	Where it was determined that a beneficiary who is a legal person or a legal arrangement presented a higher risk, the institution took enhanced measures including taking reasonable measures to identify and verify the identity of the beneficial owner of the beneficiary, at the time of payout.		
65.	21. Simplified customer due diligence	21	The institution may applied simplified customer due diligence measures under the circumstances listed in regulation 21 of the POCAML Regulations.		
66.	22. Establishment of Ultimate beneficiaries	22. (1)	The institution ensured that it was able to identify and verify the natural persons behind legal persons and arrangements.		
67.		22. (2)	The institution ensured that it understood the nature of business, ownership and control structure when performing customer due diligence measures in relation to a customer that is a legal person or legal arrangement.		

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68.	23. Person purporting to act.	23	Where a person was purporting to act on behalf of another person, the institution ensured that it verified that the person is so authorized to act and was able to identify and verify that person.		
69.	24. Life insurance related business	24. (1)	For life or other investment-related insurance business, the institution, in addition to the customer due diligence measures required for the customer and the beneficial owner, conducted additional customer due diligence measures on the beneficiaries of life insurance and other investment related insurance policies, as soon as the beneficiary or beneficiaries were identified or designated as described in regulation 24 (1) of the Regulations.		
70.		24. (2)	The information collected under regulation 24 (1) was recorded and is maintained in accordance with the provisions of the Act and Regulations.		
71.		24. (3)	The institution included the beneficiary of a life insurance policy as a relevant risk factor in determining whether enhanced customer due diligence measures were applicable.		
72.		24. (4)	Where it was determined that a beneficiary who is a legal person or a legal arrangement presented a higher risk, the institution took enhanced measures including taking reasonable measures to identify and verify the identity of the beneficial owner of the beneficiary, at the time of payout.		
73.	25. Compliance	25. (1)	The institution as soon as was reasonably practical, complied with the obligation under regulation 14 (3), after it had entered into a business relationship with an applicant for business as described in regulation 25 (1).		
74.		25. (2)	Where the applicant for business in 25 (1) did not supply evidence of identity as soon as was reasonably practicable, the institution proceeded as outlined in Regulation 25 (2).		
75.		25. (3)	The institution verified the identity of the customer and beneficial owner before or during the course of establishing a business relationship or conducting transactions for occasional customers.		
76.		25. (4)	The institution adopted risk management procedures concerning the conditions under which a customer may utilize the business relationship prior to verification.		

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77.		25. (5)	Where the institution formed a suspicion of money laundering or terrorism financing, and it reasonably believed that performing the customer due diligence process would tip-off the customer, it, instead of pursuing the customer due diligence process, filed a suspicious transaction report.		
78.	26. Politically exposed persons	26. (1)	In relation to foreign politically exposed persons as described in regulation 26 (5), the institution, in addition to performing the customer due diligence measures, took the measures outlined in regulation 26 (1).		
79.		26. (2)	In relation to a domestic politically exposed person as described in regulation 26 (5) or a person who has been entrusted with a prominent function by an international organization, the institution, in addition to performing the customer due diligence, , took the measures outlined in regulation 26 (2)		
80.		26. (3)	In relation to life insurance policies: - (a) the institution took reasonable measures to determine whether the beneficiary and the beneficial owner of the beneficiary is a politically exposed person as described in regulation 26 (5) at the latest, at the time of the payout; and (b) Where higher risks were identified in addition to performing normal customer due diligence measures; the institution took the measures outlined in regulation 26 (3) (b).		
81.	27. Foreign branches or subsidiaries	27. (1)	The institution ensured that its foreign branches and subsidiaries observed anti-money laundering and counter financing of terrorism measures consistent with the Act and Regulations.		
82.		27. (2)	Where the minimum requirements of the host country were less strict than those applicable in Kenya, the institution ensured that its branches and subsidiaries applied the requirements of the Act and Regulations to the extent that the laws of the host country permitted.		
83.		27. (3)	The institution informed the Centre and its Supervisory Authority when its foreign branch(es) or subsidiary(ies) was unable to observe appropriate anti-money laundering and counter financing of terrorism measures.		
84.		27. (4)	If the host country does not permit the proper implementation of anti-money laundering and countering financing of terrorism measures consistent with the measures set out under the Act and Regulations, the institution applied appropriate additional measures to manage the money laundering and terrorism financing risks, and informed the Centre and its supervisory body.		

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85.	28. Group-wide programmes	28	In addition to the measures provided under Regulations 11 and 27, the institution implemented group-wide programmes against money laundering, terrorism financing and proliferation financing, which apply to all its branches and majority-owned subsidiaries including measures described in regulation 28.		
86.	29. Correspondent relationships	29. (1)	The institution undertook the measures outlined in regulation 29 (1) before establishing a business relationship either as the correspondent financial institution or the respondent financial institution as described in regulation 29 (2).		
87.		29. (3)	The institution undertook the measures outlined in regulation 29 (3) with respect to "payable-through accounts," as described in regulation 29 (4), of a respondent financial institution.		
88.	30. Prohibition on dealings with shell banks	30. (1)	The institution did not open a foreign account with a shell bank, permit its accounts to be used by a shell bank, or enter into or continue a correspondent financial relationship with a shell bank or a respondent financial institution that permits its account to be used by a shell bank.		
89.	31. Money or Value Transfer Services	31	The institution in offering money or value transfer services as a product, ensured that the provider of such services was licensed or registered, had anti-money laundering and counter-terrorism financing programmes in place, and was subject to an effective system for monitoring and ensuring compliance with anti-money laundering and counter-terrorism measures and that such systems were regularly monitored for compliance.		
90.	32. Wire Transfers	32. (1)	The institution when undertaking a wire transfer in the circumstances described in regulation 32 (2) ensured that information accompanying domestic or cross-border wire transfers always had the information listed in regulation 32 (1).		
91.		32. (3)	The institution ensured that it observed the prohibition in regulation 32 (3) with regard to wire transfers to and from persons or entities that are designated under the United Nations Security Council Resolution 1267 (1999) and other United Nations resolutions relating to the prevention of terrorism and terrorist financing.		
92.	33. Reliance on third parties	33. (1)	The institution in relying on a third party to perform elements of customer due diligence measures ensured that the criteria set out in regulation 33 (1) were met.		

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93.	34. On-going monitoring	34. (1) and (2)	The institution monitored the business or account activity and transactions of customers on a continuous basis. This may have been done on a risk-sensitive basis.		
94.		34. (3)	The institution conducted on-going due diligence on its customers and developed risk based systems and procedures.		
95.	35. Ongoing due diligence measures	35	The institution has conducted ongoing due diligence on the business relationship; (a) by scrutinising transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the reporting institution's knowledge of the customer, their business and risk profile, including where necessary, the source of funds; and (b) by ensuring that documents, data or information collected under the CDD process is kept up-to-date and relevant, by undertaking reviews of existing records, particularly for higher risk categories of customers.		
96.	36. Numbered accounts	36. (1)	The institution applied the requirements set out in the POCAML Regulations to numbered accounts.		
97.		36. (2)	The institution has monitored transactions involving numbered accounts and reported any suspicious activities on the accounts to the Centre.		
98.	37. Legitimacy of source funds	37. (1)	The institution, for purposes of determining the legitimacy of funds and transactions, considered the information listed in regulation 37 (1).		
99.		37. (2)	The institution, in consultation with its regulatory body, set up policies setting out limits on the maximum cash transaction amounts non-customers can undertake with it.		
100.	38. Reporting of suspicious activities by reporting institutions	38. (1)	Where the institution became aware or ought reasonably to have become aware of suspicious activities or transactions that indicate possible money laundering, terrorism financing, or proliferation financing activities, it ensured that they were reported to the Centre within two days after the suspicion arose.		
101.		38. (2)	In reporting suspicious activities or transactions to the Centre, sufficient information was disclosed which indicated the nature of and reason for the suspicion, and where the institution has additional supporting documentation such documents was also provided to the Centre.		

Signature and Stamp (Reporting Institution) _____

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102.		38. (3)	The Suspicious Activity or Transaction Reports submitted by the institution were in the form prescribed in the Schedule to the POCAML Regulations.		
103.	40. Reporting of cash transactions	40. (1)	The institution filed reports with the Centre on all cash transactions equivalent to or exceeding US\$ 15,000 or its equivalent in any other currency carried out by it, whether or not the transaction appeared to be suspicious.		
104.		40. (2)	The reports under Regulation 40 (1) were made in the form prescribed in the Schedule or such other format as the Centre specified.		
105.		40. (3)	The reports under Regulation 40 (1) were sent to the Centre electronically by such means provided by the Centre for this purpose or any other method as may from time to time be determined by the Centre, whether as an alternative means or an exclusive means, by Friday in the week in which the transaction occurred or at such other time as the Centre may specify.		
106.		40. (4)	The institution either did not at that time have the technical capability or for another reason acceptable to the Centre, was unable to make a report under Regulation 40 (3) and accordingly complied with Regulation 40 (4) in making the report.		
107.		40. (5)	Reports submitted under regulation 40 (1) were made at the end of the week in which the transaction occurred unless circumstances demanded for the report to be made without delay in which case it was reported to the Centre immediately.		
108.	41. Tipping off	41	The institution did not disclose to any unauthorised person information obtained which was suspicious or indicated possible money laundering, terrorism financing or proliferation financing activity but reported it to the Centre as required by the POCAML Regulations.		
109.	42. Record Keeping	42. (1)	The institution ensured that it maintains and keeps records of all transactions, both domestic and international, for a minimum period of seven years from the date the relevant business or transaction was completed or following the termination of an account or business relationship.		
110.		42. (2)	The institution ensured that it keeps all records obtained as specified in Regulations 42 (2) to (5) for the period specified in Regulation 42 (1).		
111.	43. Independent audit	43	The institution adopted an independent audit function to check compliance by the institution with the POCAMLA and POCAML Regulations.		

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112.	44. Annual Compliance	44	At the end of the calendar year, the institution submitted to the Centre by the 31st of January of the following calendar year or as may be required by the Centre, from time to time, a compliance report detailing the institution's compliance with the Act, these Regulations and the institution's internal anti-money laundering, counter terrorism financing and counter proliferation financing rules.		

Section B

No	Section	Reference in Prevention of Terrorism Act, 2012 (POTA)	Description of statutory requirement under the Prevention of Terrorism Act, 2012 and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 (POT-TF Regulations) and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations 2023 (POT-PF Regulations)	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If ' Did Not Comply ', state reason for non-compliance. Use separate sheet(s) where necessary.
1.	Duty to disclose information relating to property of terrorist groups or property used for commission of offences under this POTA	Section 42(1)(a) of the Prevention of Terrorism Act, 2012 (POTA)	The institution ensured that it disclosed information regarding the existence of any property in possession or for the commission of offences under the Act No. 30 of 2012, possession or control which is to the knowledge of the institution owned or controlled by or on behalf of a terrorist group.		
2.		42(1)(b)	The institution disclosed any information regarding a transaction or proposed transaction in respect of any property referred to in Section 42(1)(a) of POTA		

No	Section	Reference in Prevention of Terrorism Act, 2012 (POTA)	Description of statutory requirement under the Prevention of Terrorism Act, 2012 and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 (POT-TF Regulations) and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations 2023 (POT-PF Regulations)	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
3.	Action to be taken on the receipt of the Sanctions List	Regulation 7(1)(a) POT-TF Regulations	The institution has taken necessary measures to freeze, without prior notice: (i) all funds or other assets that are owned or controlled by the designated person or entity, and not just those that can be tied to a particular terrorist act, plot or threat; (ii) those funds or other assets that are wholly or jointly owned or controlled, directly or indirectly, by designated persons or entities; (iii) the funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities; (iv) funds or other assets of persons and entities acting on behalf of, or at the direction of, designated persons or entities the funds or other assets of designated persons and entities		
4.		Regulation 7(1)(b) POT-TF Regulations 2024	The institution has taken necessary measures not to make available any funds or other assets, economic resources or financial or other related services as specified under section 30G of the POTA		
5.		Regulation 7(1)(c) POT-TF Regulations 2024	The institution has taken such other action as may be necessary to give effect to Resolution 1267/1989 and Resolution 1988.		
6.		Regulation 8 POT-TF Regulations 2024	The institution has taken necessary measures to implement provisions of POT Regulations 7 without delay		
7.		Regulation 9 POT-TF Regulations 2024	The institution has within twenty four hours of taking action or freezing funds or other assets under POT Regulations 7, filed a report with the Committee, through the Secretary to the Committee, in the specified manner specifying the assets frozen or actions taken including attempted transactions		

No	Section	Reference in Prevention of Terrorism Act, 2012 (POTA)	Description of statutory requirement under the Prevention of Terrorism Act, 2012 and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 (POT-TF Regulations) and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations 2023 (POT-PF Regulations)	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
8.	Return	Regulation 35(1) POT-TF Regulations 2024	The institution has within twenty-four hours of taking action or freezing funds or other assets of a designated person or entity, submitted to the Committee and the Centre, in writing, a return in the format specified by the Centre in consultation with the Committee for that purpose.		
9.		Regulation 35(3) POT-TF Regulations 2024	The institution has taken necessary measures to notify Committee and the Centre of any attempted dealing with the property or funds against which an order freezing such property or funds has been issued, within twenty-four hours of such attempt.		
10.	On-going monitoring of transactions	Regulation 36 POT-TF Regulations 2024	The institution has taken necessary measures to regularly review the domestic or sanctions lists and monitor transactions in relation to entities specified in the lists on an on-going basis to mitigate against the risks of the occurrence of the financing of terrorism.		
11.	Action to be taken on the receipt of the Sanctions List	Regulation 6(a) POT-PF Regulations	The institution has taken necessary measures without prior notice to freeze all funds or other assets owned or controlled by the designated person or entity, and not just those that tied to a particular act, plot or threat of proliferation.		
12.		Regulation 6(b) POT-PF Regulations	<p>The institution has taken necessary measures without prior notice to freeze the funds or other assets of a designated person or entity including:</p> <ul style="list-style-type: none"> (i) those funds or other assets that are wholly or jointly owned or controlled, directly or indirectly, by designated persons or entities; (ii) the funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities; and (iii) funds or other assets of persons and entities acting on behalf of, or at the direction of designated persons or entities 		

No	Section	Reference in Prevention of Terrorism Act, 2012 (POTA)	Description of statutory requirement under the Prevention of Terrorism Act, 2012 and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 (POT-TF Regulations) and the Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations 2023 (POT-PF Regulations)	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
13.		Regulation 6(c) POT-PF Regulations	The institution has taken necessary measures without prior notice to take such action as may be necessary to give effect to Resolutions to which POT-PF Regulations apply.		
14.		Regulation 7 POT-PF Regulations	The institution has taken necessary measures to implement provisions of POT Regulations 6 without delay		
15.	Reporting Obligation	Regulation 8(2) POT-PF Regulations	The institution has within twenty-four hours of identifying funds or other assets of a designated person or entity, submitted a report to the Committee in a specified manner on any funds or other assets frozen or action taken in compliance with the prohibition requirements of the relevant United Nations Security Council Resolutions.		
16.		Regulation 8(3) POT-PF Regulations	The institution has taken necessary measures to report any attempted transaction by a designated person or entity, by filing a suspicious transaction report to the Financial Reporting Centre and in such a form as may be specified by the Financial Reporting Centre.		
17.	On-going monitoring of transactions	Regulation 9 POT-PF Regulations	The institution has taken necessary measures to regularly review the sanctions list and monitor transactions in relation to persons or entities specified in the lists on an on-going basis to mitigate against the risks of the occurrence of proliferation financing.		
18.	Prohibition to making funds and other assets available	Regulation 10 POT-PF Regulations	The institution has taken necessary measures not to make available any funds or other assets to or for the benefit of designated persons or entities unless licensed, authorised or otherwise notified in accordance with the relevant United Nations Security Council Resolutions.		

Section C

No	Section	Reference in proceed of crime and money laundering act (POCAMLA) 2009	Description of regulatory requirement under The Proceeds of Crime and Anti-Money Laundering Act 2009,	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If 'Did Not Comply', state reason for non-compliance. Use separate sheet(s) where necessary.
1.	Higher Risk Countries	Section 45A(1)	A reporting institution shall apply enhanced customer due diligence on business relationships and transactions with any natural and legal persons, legal arrangements or financial institutions originating from countries identified as posing a higher risk of money laundering, terrorism financing or proliferation by— (a) the Financial Action Task Force (FATF) as having strategic money laundering and combating financing of terrorism deficiencies, that have not made sufficient progress in addressing the said deficiencies or have not committed to an action plan to address the deficiencies; or (b) the Cabinet Secretary as having ongoing substantial money laundering and terrorism financing or proliferation financing risks.		
2.		Section 45A(2)	In addition to enhanced customer due diligence measures, a reporting institution shall apply appropriate countermeasures, proportionate to the risk presented by countries— (a) when called upon to do so by the Financial Action Taskforce; (b) independently of any call by the Financial Action Taskforce to do so; or (c) as advised by the Cabinet Secretary.		
3.		Section 45A(3) (a)	In order to protect the financial system from the ongoing and substantial money laundering or terrorism financing risks emanating from the jurisdictions referred to under subsection (2), a reporting institution shall apply countermeasures including limiting or terminating business relationships or financial transactions with natural and legal persons, legal arrangements, or financial institutions located in the concerned countries		
4.		Section 45A(3) (b)	A reporting institution shall Prohibiting reliance on third parties located in the concerned countries to conduct customer due diligence		
5.		Section 45A(3) (c)	A reporting institution shall applying enhanced due diligence measures on correspondent banking relationships with financial institutions located in the concerned countries		

No	Section	Reference in proceed of crime and money laundering act (POCAMLA) 2009	Description of regulatory requirement under The Proceeds of Crime and Anti-Money Laundering Act 2009,	Enter one of: C - Complied D - Did Not Comply N - Not Applicable	If ' Did Not Comply ', state reason for non-compliance. Use separate sheet(s) where necessary.
6.		Section 45A(3) (d)	A reporting institution shall when considering the establishment of subsidiaries or branches or representative offices of financial institutions from the concerned countries, take into account whether the financial institution is based in countries identified as having higher money laundering or terrorism financing risks or inadequate money laundering or terrorism financing systems		
7.		Section 45A(3) (e)	A reporting institution shall submit a report listing customers, both natural and legal persons, and legal arrangements, originating from the higher risk countries to the Financial Reporting Centre on an annual basis		

DECLARATION:

I hereby declare that the Reporting Institution's responses in this Annual Compliance Report are accurate and reflect the Institution's extent of compliance in the reported year with The Proceeds of Crime and Anti-Money Laundering Act 2009, The Proceeds of Crime and Anti-Money Laundering Regulations 2023, The Prevention of Terrorism Act, 2012, The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on the Suppression of Terrorism) Regulations, 2024 and The Prevention of Terrorism (Implementation of the United Nations Security Council Resolutions on Prevention, Suppression and Disruption of Proliferation Financing) Regulations 2023.

Name: _____

Designation: _____

Signature: _____

Date: _____

Signature and Stamp (Reporting Institution) _____

