

CUSTOMER DUE DILIGENCE (CDD) & ANTI-MONEY
LAUNDERING (AML) / COMBATING
FINANCING OF TERRORISM (CFT)/COUNTERING
PROLIFERATION FINANCING (CPF) POLICY

(2024)



Version Control Log

Version	1.10
Review Frequency	Once in Two Year / As and When required
Approval date	April, 2024
Next Review Date	April, 2026
Prepared by	Compliance & Controls Group
Approved by	Board of Director
Distribution	All branches & Offices in Pakistan



In the name of Allah, the Most Gracious, the Ever Merciful

This policy document has been prepared in accordance with Shari'ah principles. The bank shall ensure full conformity of its operations with Shari'ah principles, Fatawa, instructions, and guidelines of the Shari'ah Board.

BOD is fully cognizant of Shari'ah rulings and its potential implications on the reputation and business of the bank. In case of any deviation of business activity under this policy, from the principles of Shari'ah & Guidelines of the Shari'ah Board, the latter shall prevail and the relevant clause / section of this policy document shall stand null and void.



INTRODUCTION

Formulation of this policy is in line with requirements of AML (Anti Money Laundering) Act 2010, Anti-Terrorism Act (ATA) 1997 and applicable SBP Anti Money Laundering (AML) /Combating Financing of Terrorism (CFT)/ Countering Proliferation Financing (CPF) Regulations& Guidelines on Risk based approach amended from time to time, United Nations Security Council (Freezing & Seizure) Order, 2019, SBP Guidelines on Targeted Financial Sanctions (TFS) under UNSC Resolutions, Counter-measures for High Risk Jurisdictions Rules, 2020 and NACTA Guidelines on Actions to be taken by Competent Authorities for Implementation of United Nation Security Council Resolution No. 1373 along with international best practices, where Bank is required to adopt risk based approach to prevent the possible use of MCB Islamic Bank Ltd as a conduit for money laundering or terrorist financing activities.

Amid increasing focus of banks and regulatory bodies on curbing ML (Money Laundering)/ TF (Financing of Terrorism) and Proliferation Financing (PF) activities, banks are required to have comprehensive AML/ CFT/CPF policy entailing guidelines on bank's ML/TF/PF risk management approach, to identify, assess, manage and mitigate these risks on an ongoing basis. Banks are required to manage these risks throughout the life cycle of its customers related to channels/ products/ jurisdiction/ services and relationships, starting from on boarding of a new business relationship until closure as well as for all walk in or occasional customers.

In addition to the above, the international AML/CFT standards such as Financial Action Task Force (FATF) recommendations, Basel Committee on Banking Supervision (BCBS) Guidelines on Customer Due Diligence, and United Nations (UN) resolutions concerning sanctions are to be followed to prevent the possible use of the Bank as a conduit for money laundering, terrorist financing or proliferation financing activities.

To further strengthen the regulatory framework to curb Money Laundering, Terrorist Financing and proliferation financing, SBP (State Bank of Pakistan) has issued AML/CFT/CPF regulations which is updated from time to time, covering the following aspects& compliance of these should be emphasized in banks policies accordingly;

Title of Regulation	Area Covered	Regulation Covers
Regulation -1	Risk Based Approach To AML/ CFT	Guidelines on Entity level Internal Risk Assessment Report (IRAR) covering ML/ TF/ PF risks including Transnational TF risks and other emerging risks for customer, products, services, delivery channels, technologies & their different categories of employees etc
Regulation -2	Customer Due Diligence (CDD)	CDD/EDD Measures for Identifying, Verifying and Accepting new customers and maintaining relationship with existing customers including occasional customers.



Regulation -3	Reliance On Third Party Financial Institutions For CDD Measures	Guidelines regarding reliance on Third Party Financial Institutions with responsibility remain with bank for CDD Measures
Regulation -4	Targeted Financial Sanctions Under UNSC Act, 1948 and ATA, 1997	TFS obligations with regards to Designated /Proscribed Persons entities owned/ controlled directly or indirectly by it & or its direction under the UNSC Act and ATA 1997.
Regulation -5	Politically Exposed Persons (PEPs)	Implement appropriate internal policies , procedures & control to determine if a customer or beneficial owner is a PEP or Family member & Close Associate of PEP prior to establishing relationship & conducting transaction enable bank to apply EDD measures while establishing relationship, continue business relations & executing transactions in PEP accounts.
Regulation -6	NGO/ NPO/ Charity/ Trust Accounts	EDD measures as specified in the regulation while establishing and maintaining relationships & execution of financial transaction with NGO/ NPO/ Charity/ Trust
Regulation -7	Reporting of Transactions (STRs/ CTRs)	Filing of STR and CTR with FMU as required under Section 7 of the AML Act 2010 (amended from time to time)
Regulation -8	Record Keeping	Maintenance & Retention of Customers and Transactions related records.
Regulation -9	Correspondent Banking	CDD measures for establishing and maintaining relationship with Correspondent and Respondent Banks/ Financial Institutions (FIs).
Regulation -10	Money Value Transfer Service (MVTs) / Exchange Companies	Regulation Money Value Transfer Service (MVTs) / Exchange Companies
Regulation -11	Wire Transfers/ Fund Transfers	Banks Responsibilities as Ordering, Intermediary and Beneficiary Institutions (as applicable) involved in processing wire transfers/ fund transfers.
Regulation -12	New Technologies	Assessment of ML/TF/PF risk for review of Products and Services including acquiring of new Technologies, services & business practices.



Regulation -13	Internal Controls	Guidelines relating to Control, Compliance Function, Audit, Foreign Branches & Subsidiaries, Employee Due Diligence and Training Programs to be adhered.
Regulation -14	Counter Measures For High Risk Jurisdictions	Obligation to establish Counter Measures for High Risk Jurisdictions Rules, 2020.
Regulation -15	Regulation and Supervision	Ensure screening of all its sponsor shareholders / beneficial owners, directors, president and key executives [all persons subject to FPT] to verify that no person is linked to any criminal activity(s) or DP/ PP directly or indirectly with any DP/PP; or affiliated with any terrorist organization

In addition to the AML/CFT/CPF regulations, SBP has also issued Framework for Managing Risk for

- Trade Based Money laundering and Terrorist Financing
- Customer Digital on Boarding Framework
- AML/CFT/CPF Regulations - Guidelines on Targeted Financial Sanctions (TFS) under UNSC Resolutions
- AML/CFT/CPF Regulations - Frequently Asked Questions (FAQs) on Targeted Financial Sanctions (TFS) Obligations
- Frequently Asked Questions (FAQs) on use of Biometric Technology to strengthen (AML/CFT/CPF) regime and restrict possible misuse of banking channel.

The above stated Regulations/framework are emphasized in Bank's procedural manuals for meticulous compliance, as MCB Islamic Bank maintains zero tolerance for regulatory noncompliance.

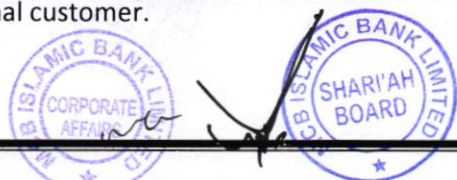
SCOPE

This policy applies to each business segment and concerned employees of MCB Islamic bank to effectively mitigate the risk of ML / FT/ PF.

As Bank is prone to the risk of being misused by criminal elements for their ulterior motives, this policy will be a guiding document for employees to address the risks stemming from customers or transactions in an effective way using risk based approach.

MCB Islamic Bank will continuously refine Customer Due Diligence processes using the risk-based approach, through the implementation of system based Risk Rating Sheet(s)/Customer Risk Profiling. Standard Operating Procedures are formulated and technology based systems are provided to the branches / field offices from time to time to ensure effective execution of the process to identify & mitigate ML/TF/PF risks attached to each customer for effective mitigation of ML/FT/PF risk.

Considering the huge size of undocumented sector in the economy, execution of due diligence process is complex and time consuming. However, for the compliance of regulatory requirements and to contain the customer related risks, MCB Islamic Bank will make best efforts to conduct proper due diligence of every existing & prospective customer and occasional customer.



POLICY INCLUDE

1. To prevent criminal elements/ persons affiliated with any terrorist organizations from using MCB Islamic Bank for money laundering activities from any of its branch or channel.
 2. To safeguard MCB Islamic Bank from being used as a conduit in Terrorism and Proliferation financing.
 3. Ensuring that only bonafide and legitimate customers are accepted.
 4. Verifying the identity of customers using reliable and independent sources.
 5. Ensuring that proscribed/ designated individuals or entities and their affiliates or associates are not having any banking relationship or provided any service from MCB ISLAMIC BANK counters.
 6. On-going Monitoring of customer accounts and transactions to prevent or detect potential ML/FT/PF/TBML activities.
 7. Implementing Customer Due Diligence process using risk based approach.
 8. To ensure implementation of Targeted Financial Sanctions (TFS) related to Terrorism & Proliferation financing (TF & PF).
 9. Managing/ mitigating reputational, operational, legal and concentration risks etc.
 10. To put in place appropriate controls for prevention, detection and reporting of suspicious activities in accordance with applicable laws/laid down procedures.
- To comply with the applicable laws, regulatory requirements and guidelines etc.

COMPLIANCE GOVERNANCE:

Governance structure of Compliance Function is established & implemented to ensure Bank wide Compliance Culture, as per following grid

- **BOARD OF DIRECTOR**

Senior Management shall define a proper mechanism to inform the BoD through its committee via sub-committee regarding status of AML/CFT/CPF program, controls, deficiencies & other regulatory issues.

- **SENIOR MANAGEMENT**

Bank's Senior Management will define ML/TF/PF risk appetite & ensure implementation of appropriate Governance through internal policies, procedures, controls & operating system & oversight of AML/CFT/CPF Compliance Program & application of competent authorities.

- **COMPLIANCE FUNCTION**

The Bank has in place independent Compliance Function to ensure overall management of regulatory risk of the Bank's Operations by effective implementation & ensuring compliance with the applicable Laws/ Regulations & Bank's Policies with special focus on ML/TF/PF risk entity wide

Further Compliance Function have access to all information/record required for smoothly.



- **INTERNAL AUDIT**

Bank has in place an independent audit function to ensure the effectiveness and adequacy of internal policies, control, procedure related to AML/CFT/CPF requirement.

- **Liability of non-compliance to policy:**

Non-Compliance of the provision to this policy will be subject to disciplinary action as per staff service rules. Further, liability may also be framed by law enforcement agencies under the provision of AML ACT 2010.

INTERNAL RISK ASSESMENT

The ultimate responsibility of ensuring effective AML/ CFT/ CPF controls lies on BoD. Therefore, BoD shall ensure adequate, reliable, periodic management information system, from senior management, for ensuring effective oversight, monitoring and accountability

The BoD shall approve IRAR. It shall include recommendations for the BoD along with a time bound action plan for mitigation of ML/ TF/ PF risks and ensuring effective AML/ CFT/ CPF policies/ procedures/ controls/ obligations/ preventive measures including but not limited to STR/ CTR and TFS. Further, the recommendations in IRAR should cover measures for improvement in understanding of ML/ TF/ PF risks of employees, senior management and BoD, and adequacy of resources i.e. systems and human resource etc.

MCB Islamic Bank will ensure timely that IRAR document is a dynamic and up-to-date document, by periodically updating their IRAR when circumstances change or relevant new threats emerge. Further, in case the NRA is updated at national level, SBP REs shall ensure updating their IRAR in light of the updated NRA.

The IRAR evaluating residual ML/ TF/ PF risks about which SBP REs have to take decisions i.e. on-boarding of customers, allowing execution of financial transactions, provision of financial service, launching of product, use of technology, and initiating business and operation in particular geographical location, etc.

CUSTOMER DUE DILIGENCE

Following are the major steps of customer Due Diligence

- Customer Identification
- Customer verification
- Customer Acceptance



CUSTOMER IDENTIFICATION

MCB Islamic bank will serve only the genuine person(s) and all out, efforts would be made to determine identity of every customer. Minimum set of documents, as prescribed in updated Anti-Money Laundering, Combating the Financing of Terrorism and Countering Proliferation Financing (AML/CFT/CPF) Regulations, shall be obtained from various types of customer(s), at the time of opening account and performing transactions for occasional customers as prescribed in updated AML/CFT/CPF Regulations.

Customer relationship is only established on the strength of valid CNIC/ SNIC/ Passport/ NICOP/ SNICOP/ POC/ ARC/ POR/ Form-B /Juvenile Card number or where the customer is not a natural person, the registration/ incorporation number, business registration number or special resolution/authority, in case of autonomous entities (as applicable).

In case of an account/ relationship of an entity with abbreviated name or title, Business shall satisfy themselves that the subject name/ title is in accordance with the constituent documents of the entity. Account/ relationship shall not be allowed in abbreviated name in cases where entity has its complete non-abbreviated name in their constituent document.

For non-face-to-face customers, Business shall put in place suitable operational procedures to mitigate the risk(s) attached with non-face-to-face prospective customer(s) and establish identity of the client. For customer on boarded digitally, ensure to implement technological solutions & parameters for identification & verification of customer in Compliance of relevant Regulation.

The below procedures for trade customers will be specifically covered in Risk Management of Trade Based Money Laundering (TBML) & Terrorist Financing (TF) SOPs of Centralized Trade Operations and other relevant procedural documents:

- a) Screening procedure of customers for trade transactions.
- b) Procedure for identification and monitoring of trade transactions with related party.
- c) Procedure for complete risk profiling of customers dealing in or intending to deal in trade.
- d) Procedure for developing Authorized Dealer's own risk profile.
- e) Procedure for verification of prices of underlying contracts related to import/export of goods/ services.
- f) Procedure for handling descriptions, which are unclear, coded or worded in a language other than English.
- g) Screening procedure of goods being traded as per relevant Trade Policy
- h) Procedure for Identification of dual use of goods

Moreover, MCB Islamic bank shall not rely on third parties to perform any CDD measures.

CUSTOMER VERIFICATION

MCB Islamic Bank shall identify the beneficial ownership of accounts/ transactions by taking all reasonable measures. Identity (ies) of the customer and beneficial owner will be verified using reliable independent sources including biometric verification. Verification of the identity of the customers and beneficial owners shall be completed before business relations are established.

Extra care is essential where the customer is acting on behalf of another person, and reasonable steps must be taken to obtain sufficient identification data to verify the identity of that other person as well. For customers that are legal persons or for legal arrangements, branches are required to take reasonable measures to (i) understand the ownership and control structure of the customer (ii)



determine and verify the natural persons who ultimately own or control the customer. This includes those persons who exercise ultimate effective control over a legal person or arrangement (iii) where no natural person is identified, the identity of the relevant natural person who holds the position of senior managing official.

Identity documents, wherever required as per updated AML/CFT/CPF Regulations, are to be invariably verified by using reliable and independent data or sources of information as prescribed in AML/CFT/CPF Regulations including utilizing Biometric Verification or in special circumstances using NADRA Verisys (the special circumstances are defined in SBP Biometric FAQs and Circulars issued from time to time). Verification of the identity of the customers and beneficial owners shall be completed before business relationship is established or a transaction is processed.

The verification of the customer address is of utmost importance when conducting the due diligence. Letter of thanks in this case serves as an evidence of verifying the address and in issuing the chequebook to the customer.

CUSTOMER ACCEPTANCE

Customer will only be accepted once above given formalities have been completed in letter and spirit. Following accounts will not be opened/maintained by MCB Islamic bank where;

- a) Identity, beneficial ownership, or information on purpose and intended nature of business relationship is not clear.
- b) Name of the individual customer/organization (including such individuals who are authorized to operate account(s) and the members of governing body/directors/trustees of an entity etc.) appears in the Proscribed/Sanctioned/ Specially Designated Nationals (SDN) entities lists.
- c) Proscribed/ designated entities and persons or to those who are known to be associated with such entities and persons, whether under the proscribed/ designated name or with a different name.
- d) Customer & transaction belongs to Non Cooperative High risk Jurisdiction(Iran/North Korea/Myanmar)
- e) Customer & Transaction & any related parties belongs to Sanctioned/designated jurisdiction & Israel
- f) Anonymous / fictitious (Benami) or numbered accounts and shall not conduct transactions on fake identity documents.
- g) Government accounts restricted to open account with Finance Division NOC
- h) Payable through accounts (An account maintained at the correspondent bank by the respondent bank, which is accessible directly by a third party to effect transactions on its own (respondent bank's) behalf).
- i) The Bank is not able to satisfactorily complete required CDD measures.
- j) Financial Institution that does not have a physical presence in any country i.e. Shell Banks.
- k) Individual/entities deals in virtual currencies
- l) Illegal /unauthorized Money Value Transfer System(MVTS) , unauthorized Money Changers etc
- m) Any other activity forbidden by the law & Shariah , gambling, human smuggling & others

CDD FOR WALK -IN-CUSTOMERS

Walk-in-customers shall only be entertained, once due diligence measures for transactions relating to such customers as prescribed in SBP AML/CFT/CPF Regulations /Guidelines have been complied with.

For walk-in-customers/ occasional customers, to establish and validate the true identity of the person(s)



executing the transactions either for self or if the person is acting on behalf of some other person(s), complete originator information must be obtained and identities must be invariably verified as directed under the regulations; using reliable, independent source of information including biometric verification or NADRA Verisys in line with SBP's Frequently Asked Questions (FAQs) on use of Biometric Technology.

Further, name clearance against sanctioned/ proscribed lists through Sanctions Screening System for walk in customer, shall be obtained, before executing the transaction to ensure that the person is not a proscribed/ designated person/ entity.

ENHANCE DUE DILIGENCE

Following accounts except above required Enhance Due Diligence required while establishing relationship & execution of transaction as per AML/CFT/CPF regulation including following but not limited, Bank's Senior Management may highlight other customer & transaction required EDD based on any changes in AML/CFT/CPF requirement as per Regulation & National Risk Assessment & Bank's Internal Risk Assessment Report

- NPOs/NGOs/ Charities, Trusts, Clubs, Societies, and Associations etc.,
- Politically Exposed Persons,
- Correspondent banking relationships, & RMAs
- Housewife,
- Proprietorship and self-employed individuals/ professionals, landlords
- Real Estate Dealers
- Religious/Ethnic/Nationalist Groups
- Customer from High Risk Countries
- Accounts wherein the fund sourced under Tax Amnesty Scheme
 - Non-resident customers,
- Money Service Businesses
- Customers in whose accounts third party mandates are given,
- Customers with links to offshore tax havens,
- Customers conducting frequent online transactions from locations having tax amnesty to avoid taxes,
 - Customers dealing in high value items etc.,
- Customers belonging to high risk sectors/ geographies as identified in NRAs,
- High net worth customers where REs feeling difficulty in monitoring source and use of funds in an account
- Customers whose identification data with regard to source of income is difficult to verify,
- Customer who have been refused banking facilities by another bank/ DFIs/MFBs,
- Companies that have nominee shareholders or shares in bearer form,
- Legal persons or arrangements that are personal asset holding vehicles,
- Legal person and arrangement whose licenses/registration etc. have been expired not renewed or cancelled/deregistered,
- Inactive Companies as disclosed by SECP on its website,
- Legal person and arrangement where required necessary approvals for conducting financial transaction have been expired not renewed or cancelled.
- Customer inquired by any LEA.



EDD MEASURES

Apply following EDD measures which may include but not be limited to one or more of the following measures, it may vary subject to type of customer, product, channels, location;

- (a) Obtaining additional information on the customer (e.g. occupation, volume of assets, information available through public databases, internet, etc.), and updating more regularly the identification data of customer and beneficial ownership.
- (b) Obtaining additional information on the intended nature of the business relationship/ transactions.
- (c) Obtaining information on the source of funds or source of wealth of the customer.
- (d) Obtaining additional information on the reasons for intended or performed transactions and purpose of transaction.
- (e) Taking reasonable measures to establish the source of funds and wealth involved in the transaction or business relationship to be satisfied that they do not constitute the proceeds from/ for crime.
- (f) Obtaining the approval of senior management to commence or continue the business relationship or execute the high-risk financial transaction by SBP REs
- (g) Where applicable, conducting enhanced monitoring of the business relationship by reviewing its nature and frequency of controls applied and selecting patterns of transactions that need further examination.
- (h) Where available, requiring the first payment to be deposited through an account in the customer's name with a bank subject to similar CDD standards.

CDD FOR ASSET SIDE/ TRADE FINANCE CUSTOMERS

MCB Islamic bank shall also undertake CDD measures of asset side/trade finance customers and ensure monitoring of such customers with regard to ML/TF/PF risk.

CUSTOMERS FROM HIGH RISK JURISDICTIONS IDENTIFIED BY FATF

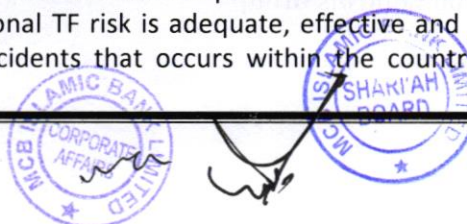
In order to comply with the Counter Measures for High Risk Jurisdictions Rules, 2020, MCB Islamic bank shall also apply Enhance Due Diligence (EDD), proportionate to the risks to business relationships with individuals and entities including Financial Institutions from high risk foreign jurisdiction as specified by the FATF and identified as High Risk during the Bank's internal ML/TF risk assessment.

TARGETED FINANCIAL SANCTIONS (TFS) MANAGEMENT

In order to comply with Targeted Financial Sanctions regime, MCB Islamic bank will devise effective system and controls to safe guard the bank from being exploited by the terrorists for TF/ PF. In this regard, all the relationships (customer/ non-customer (walk-in/ occasional customers), BoD, owners, sponsor shareholders, third party service providers/ vendors, employees (permanent, contractual or hired through outsourcing) etc.) will be screened against prescribed sanctions list (both local and international) before establishment of the relationship or processing the transactions. Further, all the relationships will be screened against the sanctioned lists on on going basis as well. If any relationship is found with existing or potential customer or occasional customer, Bank shall take the actions, as per AML/CFT/CPF Regulations.

CFT DESK:

CFT desk is responsible to ensure that Bank's internal risk assessment process for identification, assessment and understanding of TF risks including Transnational TF risk is adequate, effective and updated. In this regard, CFT desk shall analyse major terrorist incidents that occurs within the country or abroad for



assessing, the possibility of use of entity's product, services and delivery channels and consider reporting of STRs, if warranted.

Further, the roles and responsibilities of CFT Desk are separately elaborated in CFT Desk SOP.

ACCOUNTS AND TRANSACTIONS MONITORING

Business Groups shall update Expected monthly credit turnover limits in the system and/ or revise CDD profile of customer(s) as per the guidelines for on-going review in CDD & AML/CFT/CPF Procedural Handbook, while the basis of revision shall be documented and customers may be consulted, if necessary.

Such limits will be maintained to make sure that all transactions are consistent with the Bank's knowledge of the customer, its business and risk profile and are conducted in accordance with the AML /CFT/CPF Regulations, instructions of Financial Monitoring Unit (FMU) and other applicable local /international bodies.

Business must ensure that complete originator information along with unique transaction identifier is available with every domestic and cross border transfer.

SWIFT messages will be screened through name filtering solution as per defined procedures to prevent utilization of MCB Islamic Bank's channel by individuals/ organizations listed in Proscribed/ Sanctioned entity's list.

All New to Bank clients/ relationships will be screened through an automated Sanctions Screening solution. Further, financial transactions will be monitored through AML solution / Automated Transaction Monitoring System (TMS) based on predefined rules and thresholds.

MCB Islamic bank shall pay special attention to every complex, unusually large and out-of-pattern transaction(s), which have no apparent economic or visible lawful purpose. If MCB Islamic Bank suspects or has reasonable grounds to suspect that the funds are the proceeds of criminal activities or have potential to be used for terrorist activities, it shall report its suspicion to Financial Monitoring Unit (FMU) through AML/ CFT Department, CCG.

In case of suspicion, business shall raise Suspicious Transaction Reports in line with the requirement highlighted under AML Act 2010, AML / CFT/CPF regulations, Guidelines of the Financial Monitoring Unit (FMU) and as per the procedure laid down in the CDD & AML / CFT/CPF procedural Handbook of the Bank.

In case of formation of suspicion, GH-CCG will have the final approval authority for STR reporting.

Where Bank is unable to complete CDD requirements, it (a) shall not open the account, commence business relations or perform the transaction; or shall terminate the business relationship if any; and (b) shall promptly consider filing a Suspicious Transaction Report in relation to the customer.

Where the Bank forms a suspicion of money laundering or terrorist financing, and reasonably believes that performing the CDD process will tip-off the customer, the Bank shall not pursue the CDD process and shall file a STR.

DORMANT MARKING & ACTIVATION:

MCB Islamic bank will send 3 notice at frequency of 1 month, 7 days & 1 day prior to dormant marking.

