

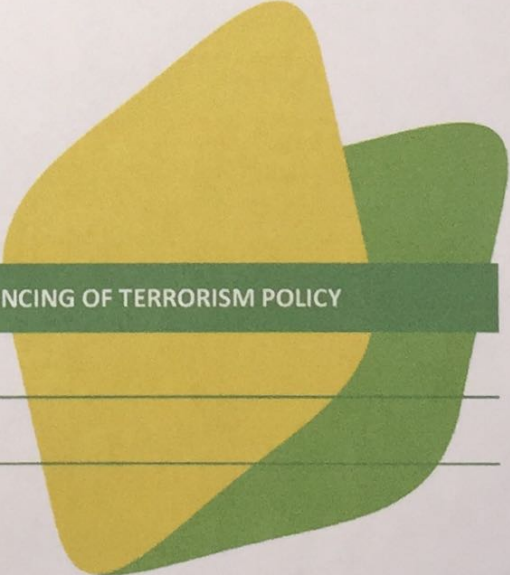


ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM POLICY

September, 2018

Advans Myanmar

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ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM POLICY

Department	Operations
Recipients	All Advans MFI Myanmar Staff

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RELATED DOCUMENTS

Name	1- General Credit Policy
	2- Admin Manual
	3- Finance Manual
	4- HR Manual

OBJECTIVES

The present policy aims to reduce the likelihood of Advans Myanmar to become the tool or the victim of financial crimes.

LAST UPDATE	VERSION	BY
30/08/2018	1.0	Advans Myanmar

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1. PRELIMINARY

1.1 Definitions

For purposes of this Policy, here are some definitions which will be use in this document:

“Beneficial owners” means the individual(s) who “in fine” owns or controls a customer and / or the person for whom a transaction is made. This also includes persons who have ultimately an effective control over a legal entity.

“Financial transaction” means an application by any person for, or the receiving of, a loan from Advans Myanmar; and repayment of the same; or Receiving or making a monetary / financial gift; Selling and buying of gold, foreign currency and negotiable instruments.

“Money Laundering” means direct or indirectly, transfer, concealment, disguising, use or acquisition of money or property known to be of illicit origin and in which such engagement intends to avoid the legal consequence of such action and includes offences.

“Financing of Terrorism” means direct or indirect involvement in terrorist activities use of unlawful force or violence to intimidate or coerce a government, the civil population or any segments thereof, in furtherance of political, religious or social objectives.

“Proceeds of crime” means any property that is derived or realized, directly or indirectly, by any person from the commission of any serious offence, such as trafficking in illegal drugs, people smuggling or arms smuggling, political or other corruption, financing of terrorist or other criminal acts by either legitimate or illegitimate funds.

"Domestic and foreign politically exposed person" means a person who is prominent or has been entrusted with public functions within the country or in any foreign country and family members or close associates of such persons¹;

"International politically exposed persons" means a director, a deputy director, a member of the board of directors and a senior member of an international organization, a member who has the similar position or a person who has been entrusted with such function and family members or close associates of such persons²;

"High-risk and other monitored jurisdictions" refer to the Financial Action Task Force (FATF) identified jurisdictions with weak measures to combat money laundering and terrorist financing (AML/CFT)³.

"Central Body" a Central Body on Anti-Money Laundering formed by Myanmar Government.

"Financial Intelligence Unit" a Unit formed Central Body which may operate freely to serve as a central national agency of Myanmar to receive, request and analyse the reports and other information related to money laundering, financing of terrorism and predicate offences and to disseminate the result of analysis, and related information urgently to relevant persons or organizations or internal and external counterpart agencies upon request, if it suspects that it relates to money laundering, terrorist financing, or any offences applicable to AML law.

"Shell banks" is a term that describes a financial institution that does not have a physical presence in any country.

"The institution" means Advans Myanmar MFI Company.

"Kyats" is the official currency of Myanmar Republic.

"United States Dollar" is the official currency of the United States of America.

1.2 Abbreviations and Acronyms

Listed below are abbreviations and acronyms that are used throughout this policy:

- Anti-Money Laundering and Combating the Financing of Terrorism – AML/CFT;
- Microfinance Institution – MFI;
- Advans MFI Myanmar – ADM;
- The Financial Regulatory Department of Myanmar – FRD;
- "Know Your Customer" – KYC;
- Micro and Small Enterprises – MSME;
- The Financial Action Task Force – FATF;
- United Nations – UN;
- Customer Due Diligence – CDD;
- United States Dollars – USD;

2. INTRODUCTION

2.1 Objectives of the AML/CFT Policy

¹ The Anti Money Laundering Law in force in Myanmar (dated 14th March 2014)

² The Anti Money Laundering Law in force in Myanmar (dated 14th March 2014)

³ <http://www.fatf-gafi.org/>

Every financial institution has to comply with the Anti-Money Laundering and Combating the Financing of Terrorism Policy (AML/CFT) regulation that apply to their activity area.

The AML/CFT policy is a critical for the safety and soundness of Advans Myanmar, to protect its reputation by reducing the likelihood of Advans Myanmar becoming a vehicle for, or a victim of financial crime and suffering consequential reputation damage and possible penalties or fines including the closing of the institution.

The present AML/CFT policy aims to define tools and actions to fight against the following mechanics used for money laundering or terrorist financing:

1. Deposit/placement: introduction of funds and illegal assets into the financial system;
2. Layering: the relocation or alteration of funds or assets in order to disguise the illicit source or intent;
3. Integration: the conversion of illicit funds, or legitimate funds intended for illicit activity, to seemingly legitimate assets;

The AML/CFT policy relies mainly on Customer knowledge ("Know Your Customer" – KYC) and on a risk-based approach which links the level of controls to the risk profile of the customers, and of the transactions realized by the customers.

2.2 Principles for AML/CFT Policy

The policy was developed on the basis of:

1. The Anti Money Laundering Law in force in Myanmar (dated 14th March 2014);
2. The Microfinance Business Law in force in Myanmar (dated 30th November 2011);
3. AML/CFT Risk Based Management Guidance Note in force in Myanmar (dated 27th January, 2015);
4. The recommendations of the Financial Action Task Force on Money Laundering (FATF), February, 2012;
5. The UN's International Money Laundering Network (IMOLIN);
6. The Basel committee's instructions about customer knowledge requirements;
7. The Wolfsberg Principles for Private Banking (2002).

The Advans Myanmar AML/CFT Policy is to be adjusted to accommodate any new regulations or legislation.

2.3 Functions and Duties of Advans Myanmar

Here are the following Advans Myanmar functions and duties according to AML/CFT regulations:

1. Implement the risk management system of money laundering and financing of terrorism to compliance with to AML/CFT internal and international regulations;
2. Identifying the customer and verifying the customer's identity by means of reliable and independent sources, documents, data or information;
3. Collecting and understanding information regarding the purpose and the intended nature of business relationship;

4. Conduct mandatory customer due diligence according to AML-CFT regulations;
5. Prohibiting to establish business relationships or dealing with shell banks and to conduct "KYC" on AML/CFT by sending questionnaire;
6. Designate a compliance officer for particularly in handling with reporting of unusual or suspicious transactions. A list of designated compliance officers must be recorded in the Head Office level;

3. "KNOW YOUR CUSTOMER"

"Know your customer" or alternatively "KYC" is the process in Institution of verifying the identity of its customers and assessing potential risks of illegal intentions for the business relationship.

KYC Policy in Advans Myanmar includes the following elements:

1. Customer eligibility criteria;
2. Customer identification procedures;
3. Monitoring of transactions;
4. Risk assessment and applying a risk-based approach.

3.1 Customer Definition

According to The Anti Money Laundering Law in force in Myanmar (dated 14th March 2014), customer means a person involved in any of the followings:

1. A person who transfers money, opens a bank account or makes a commitment;
2. A signatory to a transfer or an account;
3. A person assigned to transfer, a transferor, a person who has the right or responsibility to transfer;
4. A person who has the authority to transfer or control an account;
5. A person who attempts to deal with the matters mentioned in clause (1) to clause (4).

Based on AML law mentioned above and Advans Myanmar's operation model according to MFI license issued by FRD, a customer and their beneficial owner(s) include the following:

1. **Loan applicant:** a person and group of persons who submit a loan application to borrow money from Advans Myanmar;
2. **Supplier:** a person and legal entity who provides any goods and/or services to Advans Myanmar based on signed mutual agreement or without it; For example: agents, consultants, partners, distributors, software/hardware/stationery suppliers, freelance and etc.
3. **Financial Partner:** a person and legal entity who provides any financial services (e.g. bank accounts, loans, insurance, hedge, etc.) to Advans Myanmar based on signed mutual agreement or without it, excluding ADM shareholders; For example: banks, MFIs, lenders, donors, hedge funds and etc.
4. **Advans Myanmar staff.**

3.2 Customer Due Diligence

Advans Myanmar is required to undertake customer due diligence (CDD) measures when:

1. Establishing business relations,
2. If any doubts about the veracity or adequacy of customer identification data,
3. There is a suspicion of money laundering or terrorist financing (detailed in below Annex),
4. In case of occasional transactions with respect to deposit, withdrawal and transfer of money, determined as confidential, the account of person if:
 - a) the amount of money being **100 million Kyats and 10,000 USD** or above,
 - b) being unusual or suspicious although the amount does not exceed **100 million Kyats and 10,000 USD or above**⁴.
5. Immovable and Movable Property transaction of property with a value of **100 million Kyats and 10,000 USD or above**.

3.3 Required Documents for CDD

3.3.1 Loan Applicant

1. National registration card (NRC) or Recommendation letter if client has not NRC or driving license;
2. Household registration card;
3. Contact information;
4. The document(s) confirming a source of client income (**only for MSME**):
 - a) Official ownership documents:
 - i. Ownership book;
 - ii. Business license, certification to run business by local authority;
 - iii. Rental contract (in case business place in rental office, building or market);
 - iv. Other documents related to client's business activity.
 - b) Or employment contract for salary workers, in case of salary worker.

3.3.2 Suppliers and Financial Partners

3.3.2.1 Individual Person

1. National registration card (NRC) or Recommendation letter if client has not NRC or driving license;
2. Household registration card;
3. Tax clearance certificate and/or other document(s) confirming his/her legal activity;
4. Contact information;
5. If foreigner, the nationality, passport number and visa number.

3.3.2.2 Legal Entity

3.3.2.2.1 Myanmar-incorporated companies and registered firms

1. Certificate of Incorporation (for companies);
2. Certificate of Registration and/or Business Licence;

⁴ Myanmar's Regulatory and Supervisory Framework for Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT), Instruction No. 1/2004, dated 17th January 2004.

3. Tax clearance certificate;
4. Board of Directors' resolution authorizing the opening of the company's account together with specimen signatures;
5. Owners and beneficiary's information;
6. Contacts and bank accounts information.

3.3.2.2 Foreign-incorporated or foreign-registered entities

1. Certificate of Incorporation (for companies);
2. Certificate of Registration and/or Business Licence;
3. Tax clearance certificate;
4. Board of Directors' resolution authorizing the opening of the company's account together with specimen signatures;
5. Owners and beneficiary's information;
6. Contacts and bank accounts information.

3.3.3 Advans Staff

1. National registration card (NRC) or Recommendation letter if client has not NRC or driving license;
2. Household registration card;
3. Contact information.

3.4 Inspection

After receiving all required documents and information from customer, inspection process includes the following actions:

1. Customer on-site visit, or Sending questionnaire, and
2. Identifying and verifying the customer in the AML-CFT database/blacklist(s).

Customer on-site visit is required to loan applicants and Advans Myanmar staff. For suppliers and financial partners are required to conduct inspection by sending questionnaire via corporate email. Also, might be to conduct customer on-site visit to suppliers and financial partners from time to time, if their located close with Advans Myanmar office and/or in other cases based on Management decision.

3.5 Monitoring of Transactions

In order to avoid being the instrument of Proceeds of Crime, Advans Myanmar monitors, for all clients, unusual or suspicious patterns of transactions. Unusual or suspicious activities can be identified through:

1. Monitoring of transactions, in particular using the MIS (Management Information System);
2. Client contacts (meetings, discussions, in-country visits etc.);
3. Third party information collection.

Advans Myanmar uses operations monitoring tools:

1. Advans Myanmar implements key indicators helping to isolate accounts with unusual transactions;

2. Advans Myanmar ear marks higher risk accounts and performs intensified monitoring on these accounts;
3. Advans Myanmar uses established limits for different categories or types of accounts or transactions. Particular attention is paid to transactions that exceed these limits.

Advans Myanmar pays particular attention to transactions indicating that the customer might run unusual or suspicious activities. These alerts include transactions that:

1. Involve unit transactions or total amounts that are above the limits established by Advans Myanmar;
2. Do not appear to make economic or commercial sense;
3. Involve large amounts of cash deposits that are not consistent with the normal and expected transactions of the customer;
4. Form an unusual pattern of transactions.

The high-risk clients will be subject to in-depth monitoring as defined in internal control procedures. Advans Myanmar will ensure that the information is properly transmitted to managers, so that they can analyze and monitor this type of high risk customers with appropriate tools.

Examples of suspicious activities and transactions are presented in Annex below of the Policy.

3.6 Record keeping

According to AML-CFT regulations, it should be required to maintain, for at least five years, all necessary records on transactions, both domestic and international, to enable them to comply swiftly with information requests from the competent authorities. Such records must be sufficient to permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of criminal activity.

Keep all records obtained through CDD measures (e.g. copies or records of official identification documents like passports, identity cards, driving licences or similar documents), account files and business correspondence, including the results of any analysis undertaken (e.g. inquiries to establish the background and purpose of complex, unusual large transactions), for at least five years after the business relationship is ended, or after the date of the occasional transaction.

It also should be required by law to maintain records on transactions and information obtained through the CDD measures.

The CDD information and the transaction records should be available to domestic competent authorities upon appropriate authority.

4. RISK ASSESSMENT

Customer due diligence procedures under AML-CFT regulations, at appropriate time, on accounts, on transactions and customers based on product, service, and risk profile.

Based on customer due diligence it should be to assess the AML-CFT risk and identify 2 types of risk levels: low risk and high risk.

High risk level includes the following:

1. Domestic and foreign politically exposed person,
2. International politically exposed persons,
3. High-risk and other monitored jurisdictions.

The responsible persons to implement and conduct a risk assessment process are Advans Myanmar staff, who directly interact with customers. Here are below the responsible persons:

1. On Branch Level – Branch Manager (supervisor role) and branch staff (executive role);
2. On Head Office Level – ADM Management (supervisor role) and Head Office staff (executive role).

Based on risk level Advans Myanmar performs the following approaches of customer due diligence procedure:

1. **Standard approach** – where low risks are identified,
2. **Strict approach** – where higher risks are identified.

4.1 Standard approach

The standard approach includes the identifying and verifying the customer and their beneficial owner(s) by means of reliable and independent sources, documents, data or information with a low risk perform of transaction(s) refer to AML-CFT actions.

The standard approach is required to conduct customer due diligence according to **section 3** above mentioned.

4.2 Strict approach

The strict approach should be required in addition to performing standard approach, to:

1. Obtain ADM Management approval for establishing (or continuing, for existing customers) such business relationships,
2. Take reasonable measures to establish the source of wealth and source of funds, and
3. Conduct enhanced ongoing monitoring of the business relationship.

5. REPORTS

If any of the cases presented here above appears, and if the explanations are not satisfying or not plausible, Advans Myanmar will establish a confidential written report stating the collected information, in particular:

1. The source and recipient of funds, as well as the transaction object,
2. The identity of the requestor and of the beneficiary(ies) (name, address, occupation...),
3. The operation characteristics.

A report will be prepared if necessary by the manager of the involved branch and forwarded to the Managing Director and Head of Credit. If necessary, a detailed study will be carried out and in case of suspicion about an illegal transaction.

5.1 Suspicious transactions report

A suspicious transaction is one for which there are reasonable grounds to suspect that the transaction is related to a money laundering offence or a terrorist activity financing offence. Transaction includes one that is either completed or attempted to complete.

The criteria of suspicious transactions are described in Annex below, but it might be that suspicious transactions may differ from those and/or be a combination of those criteria.

If, based on information supplied by the customer or from other sources, an employee has reason to believe that the customer's account is being utilized for transactions related to money laundering and/or financing terrorist activities, he/she must send immediately a written note to his supervisor, and to Managing Director and Head of Credit, who shall, with the assistance of the AML-CFT delegated officer within 24 hours and before any transaction, undertake reasonable measures to collect information to ascertain the purpose of the transaction, the origin and destination of funds, so as to if the suspicion is justified or not.

If suspicion remains after this investigation, Advans Myanmar's will report its suspicions to the Central Bank of Myanmar and will take measures recommended about the termination of the business relationship with this customer.

Advans Myanmar, its officers and employees never inform their customers or allow their customers to be aware of the fact that information relating to them is being reported to the competent authorities.

5.1.1 Report content

Advans Myanmar declares in writing or orally, confirmed in writing to the Central Bank of Myanmar the following:

1. Money or other property in its possession when they could be related to a crime or be part of a money laundering process;
2. Transactions that involve money or property that might result from a crime or part of a money laundering process;
3. Any transaction where the identity of the originator or the beneficiary remains doubtful despite due diligence surveys in accordance with customer identification's rules;
4. The transactions for own account or for third parties with legal entities including their subsidiaries or establishments, acting as or on behalf of trust funds.

The declaration specifies the period within which the suspicious transaction will be executed or the reasons why the transaction has already been executed.

The declaration may concern transactions already executed when it was impossible to stop them or when it appeared after the completion of the transaction that the money could come from illicit trafficking or part of a money laundering process.

Any additional information which could consolidate a suspicion will be immediately reported to Central Bank of Myanmar.

Attempted transactions that are found to be suspicious are to be reported as Suspicious Transactions Report.

5.2 Currency transactions report

Advans Myanmar commits itself to comply with the relevant legislation, regulations, directives and agreements concerning the reporting of cash transactions.

According to Central Bank of Myanmar regulatory guidelines and instructions to enforce the Control of Money Laundering Law, the following transactions should be report to Central Bank of Myanmar:

1. In case of occasional transactions with respect to deposit, withdrawal and transfer of money, determined as confidential, the account of person if the amount of money being **100 million Kyats and 10,000 USD or above**,
2. Immovable and Movable Property transaction of property with a value of **100 million Kyats and 10,000 USD or above**.

6. PROTECTION OF STAFF

In order not to discourage staffs from reporting ML/FT activities, Advans Myanmar protects to the extent possible the staff identity and person:

1. Any direct or indirect pressure or retaliation towards the staff (if its identity was to be revealed) will be severely punished by the ADM Management;
2. The identity of the staff and the content of the reporting form will be kept confidential;
3. If, for the needs of the investigation, it is required to disclose the identity of the staff, a discussion will be held with the latter on how to proceed;
4. Should the staff be pressured by his team following his declaration, ADM Management will ensure his transfer in another team so that it does not affect his professional career;
5. The staff will be kept informed of the developments of the investigation.

7. PARTNER FINANCIAL INSTITUTIONS AND SHELL BANKS

Advans Myanmar commits itself to collaborating with the relevant law enforcement agencies and other financial institutions in combating money laundering.

For all of that, before implementing any partnership with a financial institution, Advans Myanmar should verify whether this institution has implemented AML-CFT policies complying with FAFT (Financial Action Task Force). This is mandatory for any EU financial institutions, or any other FAFT country member, and for the international subsidiaries⁵ of these institutions.

Advans Myanmar collects the following information:

1. Articles of Incorporation;
2. Agreement from legal authorities;

⁵ What has to be checked is whether the EU or FAFT financial institution, whatever its level of shares in the subsidiaries, really requests the subsidiary to respect appropriate AML-CFT procedures. Such issue has to be checked with the local entity.

3. Annual reports of the Institution.

Advans Myanmar seeks to ensure that the regulation of the institution is compatible with the Wolfsberg principles and recommendations of FATF (directly or as a subsidiary of a bank itself subject to an AML/FT regulation) that the institution knows its customers and controls its operations, to avoid that transfers made by Advans Myanmar's customers benefit to banks whose clients are possibly involved in AML/CFT activities.

The final decision to enter into a relationship with a partner bank must be approved by the Board. In any case, Advans Myanmar does not work with shell banks. Advans Myanmar can eventually request for Advans SA SICAR support to conduct necessary due diligences surveys on the potential partner financial institutions.

8. STAFF TRAINING AND RESPONSIBILITIES

Advans Myanmar has an ongoing employee training program so that staff is adequately trained in AML-CFT procedures. The Training requirements have a different focus depending on the staff function within the institution:

1. New staff is educated on the importance of AML-CFT policies and procedures put in place to prevent money laundering including those for identification, record keeping and internal reporting and the basic requirements;
2. Any new employees have to be aware of the legal provisions on deterrence of money laundering;
3. Front office staff members dealing directly with the clientele are trained: to verify the identity of new customers; to exercise due diligence in handling accounts of existing customers on an ongoing basis; and to detect patterns of suspicious activity;
4. The ADM management receives the training described above and also a training covering all aspects of policy AML/CFT, which includes the possible penalties for non-compliance with the regulations.

Regular refresh training is provided to remind to the staff their responsibilities and keeping them informed of new developments (new policies and procedures, etc.).

The ADM Management ensures that all relevant staff is trained and fully understands the need to implement AML-CFT policies consistently. Hence, the Management makes employees aware of their obligation to report suspicious transaction.

9. MANAGEMENT RESPONSIBILITIES

The AML-CFT Officer, designated by Advans Myanmar, is the person in charge and has an explicit responsibility for ensuring that the Institution's AML-CFT policies and procedures are managed effectively and are, at a minimum, in accordance with local laws, regulations, and practice. He/she is responsible for reporting suspicious transactions and to interact with Central Bank of Myanmar.

The Institution's internal auditor is responsible for evaluating and ensuring the Advans Myanmar's adherence to AML-CFT policies and procedures and the effectiveness of these policies and procedures and their compliance with legal and regulatory requirements. His/her responsibilities should include ongoing monitoring of staff performance to alert the Audit Committee or the Board of Directors if he/she believes management is failing to address AML-CFT procedures in a responsible manner.

External auditors should play an important role in monitoring the Institution's internal controls and procedures, and in confirming that Advans Myanmar is in comply with the Policy approved by Board of Directors.

10. CASE OF EXCLUSION

Advans Myanmar never accepts to consider the loan application for a client represented by a third party. The beneficiary must himself/herself do the steps with the Advans Myanmar branch.

Advans Myanmar never agrees to conduct ongoing business with a customer who insists on anonymity or who gives a fictitious name or cannot provide sufficient identity papers.

Advans Myanmar, following recommendations of the UN on measures against Terrorist Financing, does not deal with any customer or beneficial owner who appears in the international financial sanction lists (United Nations, European Union, France). If it appears that a loan has been granted on the basis of false information, Advans Myanmar will take following measures:

1. If a loan has been granted and is not closed yet, the contract will be terminated and due amount will be immediately payable;
2. In any other case, the relationship should be terminated immediately, unless the regulation recommends the contrary (e.g. keep the transaction pending, inform any Financial Intelligence Unit).

11. ANNEXES

11.1 Suspicious activities and transactions

11.1.1 Main suspicious of customer behaviour

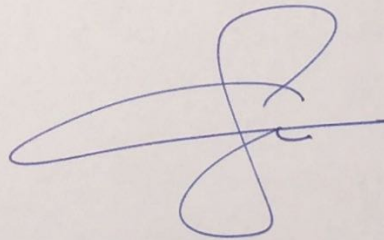
1. A customer cannot or is unwilling to provide or delays providing appropriate identification, banking history, source of funds, or adequate explanations or information, even when given adequate opportunity to do so;
2. A customer has no discernible reason for using the Advans Myanmar's services, e.g., a customer with a distant address who could operate an account more easily with a Financial Institution nearer their address;
3. A customer is acting through and being represented by an intermediary or third party where there is no discernible reason for them to do so;
4. A customer regularly makes transfers to or receives large sums from countries associated with drugs or terrorism, and there is no obvious explanation for these transactions;

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5. A customer appears to have several accounts with other financial institutions locally, especially where there is regular consolidation of monies from these accounts followed by a request to transfer the funds elsewhere;
6. Several clients involved in cash transactions have the same address;
7. The status of the client does not match with the volume of the transactions (a student or an unemployed who manage large funds);
8. Non-profit legal entities involved in major financial transactions unrelated to their activity;
9. A customer deposits cash with false bank notes;
10. Ordering customer's name is similar to beneficiary name (perhaps using an alias);
11. Incomplete information – refusal to include information in forms;
12. Incomplete information – refusal to include information in forms by walk in customer;
13. Customer refuses to explain relationship to beneficiary.

11.1.2 Main suspicious transactions

1. Cancellation of a transaction because of reporting and/or information requirements;
2. Transaction to 'country of interest' – tax haven countries or drug source/destination countries;
3. Transaction amount is significantly higher than regular transactions made by same customer;
4. No business rationale for making the transaction in a certain way (there are easier and less complicated ways to undertake the same transaction);
5. Customer refuses to answer reasonable questions regarding the transaction.



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WHISTLEBLOWING DECLARATION FORM

Whistleblowing channel / date of report

- ☐ Report via email ____/____/____
 ☐ Report via telephone call ____/____/____
 ☐ Report via direct interview ____/____/____
 ☐ Other (specify) : ____/____/____

Whistleblower contact details

☐ **Anonymous whistleblower** Email/ Phone N°: _____

☐ **Known whistleblower (details below)**

Surname : _____ First name : _____

Position : _____ Branch/ Assigned department : _____

Email/ Phone N°: _____

Description of suspicion

Suspected person(s)/department(s) - Advans

Involvement of persons outside Advans

Where and when did the fraud/misconduct take place?

Events witnessed by the whistleblower

Reason leading to suspicion

Possibility of supplying evidence (specify)?

Additional interview

Additional interview held: ☐ Yes (date): ____/____/____ ☐ No

Whistleblower signature: _____

Administrative

Identity of the person filling this form:

☐ General Management
 ☐ Head of Internal Audit
 ☐ Group Audit
 ☐ Audit Committee

Decision to investigate (justify): ☐ Yes ☐ No

If yes, department in charge of investigation: ☐ Internal Audit ☐ Risk ☐ Other (specify): _____

Date and Signature : _____

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