

CRDB/DRB/0064/V001/12-2021

For Action: Sales and Service/Support Officer, Team Leader, Sales and Service or Support, Manager Customer Experience, Manager Business Development, Branch Manager, AML & Sanctions specialist, Manager Account Personalization Unit,

For Information:

Directors and Head of Departments/Business Units
Senior Managers and Department Managers- Head-Office
Zonal Managers and Branch Managers
Risk & Compliance and Auditors
All other employees at Head Office, Zones and Branches

Purpose:

- ☒ New Procedure
☐ Substitution of Procedure ref:
☐ Cancellation of procedure ref

Starting date: 17th December, 2021

Next Mandatory Review Date: 17th December, 2023

Description: Procedure for Centralised Account opening for Enterprise and High Risk Accounts

Introduction and Rationale:

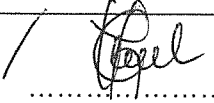

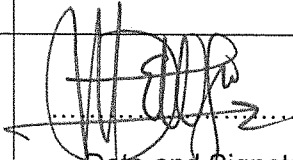
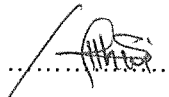
The Procedure for Centralized Account opening for Enterprise and High Risk Accounts was reviewed and vetted for approval by the OPGVC (Operational Procedure and Governance Vetting Committee)

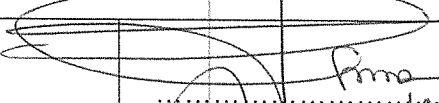
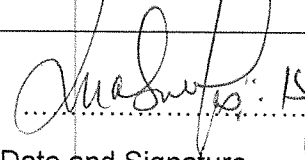

This procedure document details steps that should be followed when boarding of High risk Customers, Individuals & all Enterprise accounts.


With effect from 17th December 2021: Sales and Service/Support Officer, Team Leader, Sales and Service or Support, Manager Customer Experience, Manager Business Development, Branch Manager, AML & Sanctions specialist, Manager Account Personalization Unit and all other staff involved in the process are required to start using the process described in the detailed process.


Directors, Head of Departments and Branch Managers are required to ensure that all staff under them read, understands and adhere to the procedures as described in the processes flow chart, and work instructions as detailed in the attached document.


In case of any further clarification, please contact Head of Branch Network Ext. 1466 or E-mail BOC_STAFF copying Head of Branch Network.


Process Owner: Bonaventura Paul Head of Branch Network	 Date and Signature 17/12/21
Reviewed by: Winniefrida Wanyancha Head of Business Transformation	 17/12/21 Date and Signature
Endorsed by: Evarist Muhaya Head of Compliance and Governance	 8/12/21 Date and Signature
Supported by: Leo Ndimbo Director of Business Transformation	 17/12/2021 Date and Signature


Supported by: Boma Raballa Director of Retail Banking	 16/12/2021 Date and Signature
Risk Reviewed and Vetted by: James Mabula Director of Risk and Compliance	 15/12/21 Date and Signature
Approved by: Joseph Witts Chief Commercial Officer	 17/12/2021 Date and Signature


Process Type:		Account Opening		
Process Owner:		Head of Branch Network		
Accountable Executive:		Director of Retail Banking		
Process Name:		Handling of Account Opening via SAVVY		
Detailed Process Description		This procedure is used across CRDB Bank for on boarding of High risk Customers, Individuals & all Enterprise accounts, aiming at improving the AML/KYC and sanctions compliance to ensure sufficient due diligence has been done prior to account operations.		
Process Number: CRDB/DRB/0064/V001/12-2021				
A. High Risk Customers, Individual and Enterprise Accounts				
Process Step Number	Role	Action Description	Detailed Instructions	Support Tool or system
1	Sales and Service/Support Officer	Collect customer application and documents for verification	1.1 Collect completed/filled account opening application form and required documents from the client as per the KYC/CDD Guidelines and EDD procedures for High Risk Customers 1.2 Verify all the mandatory documents collected are current/valid against original documents and the form is properly filled, then certify the documents by indicating as "true copy of origin" 1.2.1 In case of any anomaly, return to customer for rectification 1.2.2 If there is no any anomaly, stamp, sign the account opening form and all collected documents then submit to Team Leader, Sales and Service or Support/MCE/MBD/BM for checking and signing	Account Opening Form KYC/CDD Guidelines


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2	Team Leader, Sales and Service or Support/MCE/MBD/BM	Receive mandate file for review and sign off	<p>2.1 Receive mandate file submitted by Sales and Service/Support Officer</p> <p>2.2 Confirm details filled in account opening form and verify all documents obtained as per KYC/CDD Guidelines and EDD procedures for all High Risk Customers.</p> <p>2.2.1 In case of any anomaly, return to Sales and Service/Support Officer for rectification</p> <p>2.2.2 If there is no any anomaly, counter sign account opening form and submit the documents to Sales and Service/Support Officer to proceed with scanning and uploading of documents in the system</p>	<p>_Account Opening Form</p> <p>_KYC/CDD Guidelines</p>


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3	Sales and Service/Support Office	Scanning documents in Savvy scan or Kyocera machine	<p>Document scanning in the Savvy Scan</p> <p>3.1 Scan the documents through Savvy Scan as per section 8.0 of Customer <i>Account operations Procedures Version 6.0 March 2021</i>.</p> <p>3.2 Document shall be automatically uploaded, Use reference number instead of account number to access the documents.</p> <p>Document scan in Kyocera machine</p> <p>3.3 Log in the Kyocera machine</p> <p>3.4 Scan specimen in JPEG format and the rest of documents in PDF</p> <p>3.5 Proceed with step number 4</p> <p>NOTE:</p> <p>1. As far as it is possible, all documents have to be scanned the same or early next working day after account opening records have been captured in the Savvy Flow system</p> <p>2. For accounts with more than 4 signatories documents have to be scanned using Savvy Scanner</p>	<p>_Savvy Scan</p> <p>_Kyocera machine</p>


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4	Sales and Service/Support Officer	Log in into SAVVY system and key in required details	<p>4.1 Log in into SAVVY</p> <p>4.1.1 Click Account Opening, then Account Request</p> <p>4.1.2 Select Individual Accounts/ Enterprise accounts/ Joint accounts/ Sub reference accounts and key in all required details in "General Account details" then submit.</p> <p>4.2 Complete all details in "Relationship field" for Enterprise account , then submit</p> <p>4.3 Add signatories details in "Signatory field", then submit</p> <p>4.4 Write the Generated reference number on the specimen</p> <p>4.5 Select "Document studio", then Document manager , enter reference number and upload required documents</p> <p>4.6 Go back to Account Opening, then Account request and crop photos and signatures</p> <p>4.7 Select "Decision field" and submit for approval</p> <p>4.8 Submit mandate file to Team Leader, Sales Service or Support/MCE/MBD/BM for further review and approval.</p>	_SAVVY System


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5	Team Leader, Sales Service or Support/MCE/MBD/BM	Receive mandate file for review and approval in SAVVY	5.1 Log in into SAVVY 5.1.1 Click Account Opening. 5.1.2 Select Individual Accounts/ Enterprise accounts/ Joint accounts; verify inputted details in the system against physical mandate file. 5.1.3 Select "Decision field" and make decision as follows; 5.1.3.1 In case of any anomaly, select "Referred" if account only needs rectification or select "Rejected" if account is not qualified to be opened. 5.1.3.2 If there is no any anomaly, make decision by selecting "Business manager Approve". 5.1.3.3 Write the Generated account number on the respective documents including Specimen Signature Card 5.1.3.3.1 In case of Low and Medium Individual accounts, account shall be routed to complete stage. 5.1.3.3.2 In case of Enterprise and High risk accounts, account shall be routed to sanction screening queue with debit flag. Attach High risk & PEP Acceptance Form signed by Branch Manager	_Customer mandate files _ SAVVY system _Core Banking System _HRC assessment Form _Email	


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5	Team Leader, Sales Service or Support/MCE/MBD/BM	Receive mandate file for review and approval in SAVVY	5.4 Give the customer generated account number and advice to make initial deposit. 5.5 Ensure BRELA Search is conducted as per BRELA Online Company Search procedure. Note. 1. The Specimen Signature Card shall have to bear both Reference number & Account number but on the system documents shall bear only reference number	_Customer mandate files _ SAVVY system _Core Banking System _HRC assessment Form _Email	
B. High Risk Customers and Enterprise Accounts					
6	AML & Sanctions specialist	Screening against AML, Sanctions and adverse media	6.1 Log into Savvy System. 6.2 Select "User worklist" then "Sanction screening" select and assign work item. 6.3 Select "Account Opening" then "Sanction screening" 6.4 Determine Rating grade of the request i.e. high, medium or low from pin "Party segment details",		


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6	AML & Sanctions specialist	Screening against AML, Sanctions and adverse media	<p>6.4.1 Log in into SWIFT Names screening and conduct AML, Sanctions and adverse media screening on client's full name, shareholders, directors and signatories and save screening results.</p> <p>6.5 Copy account reference number in "General Account details" then go to "Document studio", then "Document manager", filter and paste reference number.</p> <p>6.5.1 Select "Business Process" and click "New account Opening" then submit</p> <p>6.5.2 Upload Sanction screening report in customer documents page</p> <p>6.6 Go back to "Account Opening" then "Sanction screening" select "Decision field" and make decision as follows;</p> <p>6.6.1 In case of any anomaly, select "Reject" and add reason for rejection in remark space, then submit.</p> <p>6.6.2 In case of any anomaly, which can be, rectified, select "Return_ modification" with remarks then submit.</p> <p>6.6.3 If there is no any anomaly select "Approve" and submit for APU further processes</p>	<p>_Email</p> <p>_Swift Name</p> <p>Screening</p> <p>_SAVVY System</p> <p>_HRC assessment Form</p>

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6	AML & Sanctions specialist	Screening against AML, Sanctions and adverse media	6.7 In addition to above steps conduct vetting for accounts risk rated high Note: 1. FCC share ensure screening & vetting is completed within 24 Hours	
7	Manager APU (verifier)	Verify and approve Account opening	7.1 Log into Savvy System. 7.2 Select "User worklist" then "Account verification" for assignment or distribution of the accounts. 7.3 Select "Account Opening" then "Account verification" 7.4 View assigned account and verify "General Account details", "Party segment details", "Address and contact details" and "Customer details" in comparison to uploaded/attached documents.	_SAVVY System _KYOSERA / Scanner

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7	Manager APU (verifier)	Verify and approve Account opening	<p>7.5 Select "Relationship field" and verify all details in comparison to uploaded/attached documents.</p> <p>7.6 Select "Signatory field" and verify all details, photo(s) and signature (s) in comparison to uploaded/attached documents.</p> <p>7.7 Request respective branch to share BRELA Search result through emails to confirm completion of the process and that no issue has been noted on search</p> <p>7.8 Select "Decision field" and make decision as follows;</p> <p>7.8.1 In case of any anomaly, for accounts with action to approval from screening, select "Return_ modification" then submit.</p> <p>7.8.2 If there is no any anomaly in KYC compliant select "Approve" otherwise select "Return_ modification" or "Reject" as per sanction screening decision.</p> <p>7.8.3 If there is no any anomaly in KYC compliant select "Approve" otherwise select "Return_ modification" or "Reject" as per sanction screening decision</p>	_SAVVY System _KYOSERA / Scanner

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7	Manager APU (verifier)	Verify and approve Account opening	Note: 1. Account Opening Verifier shall confirm with respective branch through email that BRELA search already conducted 2. Upon authorization debit flag shall be removed automatically 3. Once authorized, customer shall receive automatic notification		_SAVVY System _KYOSERA / Scanner

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Accountability for Implementation				
<ol style="list-style-type: none"> 1. The Branch Manager shall be accountable for an overall implementation and operating effectiveness of this process flow, and controls at the branch. 2. Quality Assurance Specialist shall support the Branch Manager to ensure daily compliance of the process by conducting daily assessment, raising deviations to the process and report to the Branch Manager for timely correction. 3. The Branch Manager shall ensure that all raised issues by the Quality Assurance are adequately addressed within 1 day, failure of which the Branch Controller shall escalate to the Head of Branch Network at Head Office. 4. AML & Sanctions Specialist shall support SMFCC to ensure daily compliance of the process by conducting periodic quality check/review and raise deviation from process to Senior Manager Financial Crime Compliance 5. Manager Transaction monitoring shall ensure daily alert review on Swift Name screening and on weekly basis identified HRC shall be shared to the Manager FCC for EDD 6. Senior Manager Financial Crime Compliance (SMFCC) shall be responsible for providing awareness on procedure and assist HOCG on overall implementation and operating effectiveness of this process flow and control across the Bank Network 7. Head of Compliance and Governance shall be responsible for an overall implementation and operating effectiveness of this process flow and control at Head office 8. Head of Branch Network shall be responsible for an overall implementation and operating effectiveness of this process including the implementation and operating effectiveness of BRELA Online Company Search procedure. 				

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Key words and abbreviations <ol style="list-style-type: none"> 1. AML-Anti Money Laundering 2. APU-Account Personalization Unit 3. CFT - Combating the Financing of Terrorism 4. KYC - Know your customer 5. CDD -Customer Due Diligence 6. EDD - Enhanced Due Diligence 7. HRC- High Risk Customer 8. HBN - Head of Compliance and Governance 9. HOCG-Head of Branch Network 10. FCC - Financial Crime Compliance 11. BRELA - Business Registration & Licensing Authority 12. Swift Name screening- A solution for screening New Bank customers during onboarding and Batch screening for existing customers. SWIFT Name screening system screens customers against the Global Sanction Lists maintained on system. 				