



SURYA REMIT PVT. LTD.
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Surya Remit Pvt Ltd

Training on ANTI Money Laundering (AML), Compliance and Fraud

1. Money Laundering.

Money Laundering is the hiding or concealing the origination of the fund, assets or the money. It is the process of cleaning the money that was earned from criminal or illegal activities. Generation of fund from activities such as Drug and Human trafficking, extortion, killing, robbery, illegal gambling, terrorism etc. are regarded as dirty money and act of making those dirty money to a clean is regarded as money laundering.

General, following activities by a customer can be regarded as suspicious activities:

- I. Customer seems hurry since s/he enters your counter.
- II. Customer always arrives in your counter at just opening or just before you are closing your counter.
- III. Customer mostly arriving at busiest period of the time.
- IV. Customer showing various unrelated activities.
- V. Single person receiving multiple transactions in single day or small-time frame but the relation to the sender is unclear.
- VI. Various people receiving lot of small amounts of money from a single sender frequently.
- VII. Customer receiving huge amount of money from irrelevant sender, etc.

Nepal Rastra Bank (NRB) has guidelines to report such suspicious transactions in the form of Suspicious Transaction Report (STR) and Threshold transaction report (TTR) every 15 days. Suspicious transactions are those which Front level Associates (FLA) feels the transactions are suspicious and threshold transactions are those transactions which cross the imposed limit to a receiver i.e., of Rs 1000000.00 (Ten Lakh Rupees). Threshold can be single transaction or small number of multiple transactions.

Reporting of such transactions not only helps us not to be victim of such money laundering but also help such to be safe from its consequences.

2. Anti-money Laundering and Compliance.

How money launderers works and National and International laws and policies for Anti Money Laundering (AML)



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Compliance

- a) How to capture all data to Western Union software.
- b) Keeping of valid IDs as directed by Nepal Rastra Bank and Western Union. In some of the transaction we have to capture more than one ID.
- c) Filing the documents for future.
- d) Monitoring of suspicious actions of customers and reporting such transactions.
- e) Monitoring / reporting threshold transactions.
- f) NRB guidelines for Suspicious Transaction Reporting (STR) and Threshold Transaction Reporting (TTR).

Types Of Fraud

1. Consumer Fraud

- Occurs when criminals convince or trick consumers to transfer money to the criminal or criminal associate
- Involves the victim's perception that they will benefit financially or are helping family/ friend
- Target most vulnerable sections of society like the elderly
- Advanced Fee / Pre Payment-Fee Scam
- Anti-Virus Scam, Charity Scam, Emergency Scam, Employment Scam, Fake Check Scam, Grandparent Scam, Immigration Scam, Internet Purchase Scam, Tax Scam, Lottery Scam, Mystery Shopping Scam, Relationship Scam, Overpayment Scam.

a. Consumer Transaction Fraud Indicators:

- Consumers receiving transactions under different names / spelling variations
- Same / similar ID numbers/ date of birth/ address are used for multiple receivers
- Consumers receiving unusual transactions amounts in a short period of time
- Single or multiple consumers receiving multiple transactions from a single sender and Consumers receiving multiple transactions from multiple senders with no apparent family relationship from multiple countries.
- ID location for multiple receivers do not co-relate with the transaction origin
- Receiver's occupation does not support the number of transactions being received or the countries it is originating from.
- Consumer picking cash and handing over the cash to another person inside / outside the agent location.
- Consumers collecting transaction late in the night

b. Agent Fraud

Types of Agent Fraud

- a. Agent Fraud Perpetrated Over the Telephone by:
 - Remote Access



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- Computer Intrusions
- Test Transaction
- Code Entries
- b. Agent Fraud Perpetrated by E-Mail by:
 - Phishing

Everyday Fraud Prevention Practices

- Reviewing Fraud Awareness material provided
- Reviewing any Fraud alerts received
- Never allow consumers to see the PC screen when entering transaction information
- Never allow unauthorized persons behind the counter or near the WU system
- Never respond to e-mails, phones, etc. requesting WU information such as account numbers, terminal IDs, Operator IDs, etc.

Anti-Corruption Compliance

WU is subject to anti-corruption laws and regulations, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, everywhere the WU conducts business. WU strictly prohibits bribery and corruption in any form by its Agents, Sub-Agents, and any other third party acting on behalf of WU or in relation to business with WU. This prohibition on bribery includes improper payments to government officials, commercial bribery, and facilitation payments. The Agent compliance program must prohibit bribery and corruption in its business and that of its Sub-Agents and must maintain sufficient internal controls to detect and/or prevent improper payments in its operations as they relate to its business with WU. Additionally, should an Agent or any of its Sub-Agents become aware of any matter in their business relationship with WU that may violate, or appear to violate, WU's anti-corruption policies and procedures, the Agent or Sub-Agent should immediately report the matter to any of the following reporting channels:

- Your Dedicated WU Compliance Contact;
Surya Remit Pvt Limited- info@suryaremit.com / suryaremitwu@gmail.com

Corruption & bribery red flags

As corruption and bribery are serious crimes with significant consequences, their associated red flags cannot be ignored. Identifying and reporting corruption and bribery red flags are a key component of any anti-corruption and compliance program. The Agent and its Associates should be alert to the below potential red flags and suspicious behavior:


- Consumer offers something of value to the Associate in exchange for the Associate to not perform their duties (e.g., not collecting required identification details, ignoring red flags associated with other typologies such as human trafficking or terrorist financing, etc.).
- Customer appears to be acting on behalf of a third party, particularly a Government Official, but did not disclose that information to the Associate. In addition, the Agent should be aware of the below potential red flags as they pertain to prospective and current Sub-Agents. Appropriate due diligence measures should be taken to properly assess and mitigate potential corruption or bribery risk presented by the Sub-Agent.



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- Connection to Government Entities/ Government Officials
- Sub-Agent has an owner, major shareholder, or board member who is a Government Official, as defined by Western Union's Global Anti-Corruption Policy Statement.
- Sub-Agent is a Government Entity.
- Sub-Agent has a Politically Exposed Person (PEP) connection/relationship.
- Sub-Agent has undisclosed/misleading connections to Government Entities or Government Officials.
- A Government Official requests or demands that a specific Sub-Agent is onboarded or kept on as a sub-agent.
- Sub-Agent will help/has helped/is helping recruit potential sub-agents to work with Western Union, which may include government-owned institutions.

S N	Name of Agent	Address	Contact Person	Signature
1	AARATI MONEY TRANSFER	KAGESHWORI MANAHARA, KATHMANDU	9702432660	



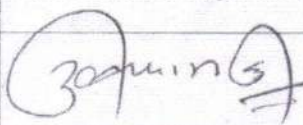
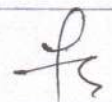

Date: 05-August-2023
 Deep Raj Lamichhane
 Compliance Officer

 Authorized Signature

Agent Training Report

All Fields are Mandatory

Agent Name: Surya Remit Pvt

Location Name	Aarati Money Transfer		Code	Operation Hrs.	Operating Days
			ANP118410	9:30- 6:00	SUNDAY- FRIDAY
Location Address	Kageshwori Manohara-9		FLA Name	Jay Ram Ghimire	
				Class of Trade	Nature of Business
City	KATHMANDU	Pin code			MONEY TRANSFER
District	KATHMANDU	Phone 1	9842098247	Email ID	aarati.money@gmail.com
State	BAGMATI	Phone 2	9813509216	Date of Audit	August-05-2023
S. NO.	Parameter	Yes	No	Comments if Any	
Location/Owner Training Undertaking		Yes			
1	The Agent has been trained on the Western Union International Inbound Cash to Cash Money Transfer Process	Yes			
2	The Agent has been trained on Mandatory Regulatory guidelines for conducting Money Transfer Service Scheme business	Yes			
3	The Agent has been trained on the Acceptable Know Your Customer Documents with address proof	Yes			
4	The Agent has been trained on the Payout Procedure and Streamlined Payout Policy	Yes			
5	The Agent has been trained on filling of To Receive Money form for each transaction	Yes			
6	The Agent has been trained on Data Capture/Integrity Guidelines	Yes			
7	The Agent has been trained on the Compliance guidelines of Money Laundering	Yes			
8	The Agent has been trained on Monitoring of Suspicious Activity	Yes			
9	The Agent has been trained on Additional Due Diligence Requirements	Yes			
10	The Agent has been Trained on the importance of working from the Location Audited by Western Union	Yes			
11	Is the Agent aware about Network Agent CSC Contact Number	Yes			
12	Does the Agent know about Western Union CSC Contact Details	Yes			
Name and Signature of Auditor/Agent Employee.		Name and Signature of Operations Manager of Agent.		Signature and Stamp of Location owner whose training has been conducted.	
DILEEP RAJ LAMICHIHANE					
Jay Ram Ghimire					

Important Note: 1) The Form has to be filled completely before submitting to Western Union.
 2) The form has to be signed and stamped by the Agent and Agent Employee conduction the training.
 3) Please do not submit forms which are not complete or if the answer is No in any of the Training aspects. Agents have made aware of all the points before submitting the form to Western Union.