



## STANDARD OPERATIONS POLICY MANUAL

### Version 1.0

Process number	PTB/BSG/SOM/22/0001
Process Owner	Banking Services Group
Process Status	Draft
Date Signed Off	August 2022
Review Frequency	24 Months
Next Review Date	July 2024

#### Document Control & Approval

#### Revised Version and Update History

Date	Document Version	Document Author	Document Reviewer
31 – 06 – 2022	1.0	Tolulope Ogundipe	Cyril Osheku

#### Change Control

*The contents of this document are subject to change control*

## **CHAPTER 1: INTRODUCTION AND STATEMENT OF POLICY**

### **1.0 GENERAL INTRODUCTION**

- 1.1 The Premium Trust Bank Operations Policy Manual contains the minimum operating requirements that provides necessary guide on how to handle transactions processed in the Bank.
- 1.2 Therefore, this Operations Policy Manual must be only one document, although a key one, within the Bank's library of Policies. PremiumTrust Bank's Credit Policy Manual, Credit Process Manual, IT Policy and various other institutional policies and procedural manuals are amongst additional vital documents that must be understood as well.
- 1.3 This is not a document to provide any full-fledged legal framework of banking operations and is a guide to operatives and not a complete substitute for extant circular instructions, directives etc., that may be issued from time to time by the regulatory authorities on banking practice in Nigeria.
- 1.4 In view of the dynamic operating environment, Branches may recommend appropriate supplements to this policy manual and its circumvention without adequate and appropriate approval will be met with stiff disciplinary measures.

### **2.0 OBJECTIVES**

- 2.1 The objective of this Operations manual is to present uniform operating standards for the Bank's processes across the network. This document is prepared with a view to providing a ready guide to staff of the Bank in day-to-day banking operations.
- 2.2 This manual is to ensure compliance with regulatory requirements and industry practices in delivering effective and efficient customer experience.

### **3.0 STATEMENT OF POLICY**

#### **3.1 GENERAL**

- 3.1 This manual contains the policies and regulations guiding PremiumTrust Bank transactions and operational activities. All members of staff are expected to be conversant with the manual in general and must be familiar with the sections relating to their job functions and conform to all applicable laws, regulations, internal policies and acceptable banking practices.
- 3.2 The Manual is the property of PremiumTrust Bank, and shall, under no circumstances, be copied, sold, or reproduced for private or commercial use without the express permission of the Bank. Therefore, no part of the contents of this manual is to be made available to unauthorized persons

#### **4.0 COMPLIANCE**

- 4.1 The policies presented in each chapter are mandatory. Breach of any part of this policy shall be penalized in line with Bank's Sanction grid.

- 4.2 Any exception/deviation from the standards set by this manual shall require approval by Executive Management.

**Banking Services Group shall be the custodian of this policy, however, recommendation for review or modification any part of this policy must be routed through the line Executive Director/Chief Operating officer for appropriate concurrence.**

## **5.0 DELEGATIONS AND DESIGNATION**

- 5.1 Delegation of authority shall be performed whenever practicable. The functions indicated in this manual as assigned to specific Officers may be delegated to other Officers.
- 5.2 Officers to be designated to scheduled functions/responsibilities will always receive a written communication to that effect.
- 5.3 It should be noted that the ultimate responsibility for an assigned task, lies with the delegating Officer.

## **6.0 BASIC CONTROLS ON TRANSACTION PROCESSING**

- 6.1 Responsibilities shall be segregated down the line so that no individual, irrespective of level, title or job function can process a transaction from start [initiation] to the finish [final authorization]. This means that a transaction shall require intervention from at least two individuals prior to completion.
- 6.2 It will be the duty of the Group Head, Banking Services and Group Head, Internal Control & Compliance to introduce additional controls whenever necessary with relevant stakeholders' subject to Executive Management's approval. The Group Head Banking Services shall be responsible for ensuring that policies and control requirements are met.
- 6.3 Custodians of Cash, Securities and other Bank valuables who are proceeding on vacation or other absences exceeding one working day shall surrender their holdings to a relief officer who shall verify the holdings against the hand-over note prepared and relevant records prior to the regular custodian's departure. The verification should be performed in the presence of the regular custodian[s] or person designated by Management. The details of the handing/taking over shall be in writing and jointly agreed on.
- 6.4 No cheque, Bank draft or similar instrument issued or endorsed in Favour of the Bank shall be processed unless there is a clear instruction as to the purpose for which funds are intended.
- 6.5 Procedures in place shall ensure that transactions are correctly processed, authorized, and recorded to provide an acceptable audit trail. Procedures

in place shall also prevent accidental or intentional damage/instruction to processing systems and records.

- 6.6 Provisions and plans must be developed to ensure continuity of processing under adverse conditions, even after the destruction of equipment and primary records. There shall be in place a comprehensive Business Continuity and Disaster Recovery Plan.
- 6.7 A sound operating base shall support traditional products as well as new products development. An optimum balance will be achieved by placing equal emphasis on operating standards, productivity and proper controls. Audits and proofs are integral parts of efficient operations and shall be coordinated in such a manner as to achieve maximum benefits.
- 6.8 All new products shall be supported by an approved product paper.

## **7.0 ELECTRONIC AUTHENTICATION**

- 7.1 All access to automated systems (Programs, Applications and Operating Systems) and Data Elements must be subjected to authorization.
- 7.2 All customers or institutional data elements transmitted outside the physical confines of the Bank must be protected against unauthorized alteration, deletion or addition.
- 7.3 A properly implemented and maintained electronic identifier, such as a password, maybe substituted for bio-metrics, a signature or other manual means for controlling access to programs and data (provided the system allows unique identification of the individual user).
- 7.4 The message or transaction authentication function usually provided in manual systems by a written signature may, with concurrence of Legal Services Department, be replaced by a properly implemented and maintained authentication system. Since the authentication is an integral part of the transaction, including the identity of the authorizing individual, it must remain with and be a part of the transaction or document throughout its useful or legal life.
- 7.5 When introducing an automated process, phasing-out or upgrading an existing procedure, Legal, Compliance and other relevant stakeholders shall be consulted to ensure the validity of such replacements.

## **8.0 PROCESS AMENDMENT PROCEDURE**

- 8.1 Units or Branches may also initiate new procedures through the Strategy Department/PMO and such procedures shall be consistent with the policies and controls contained in this Manual subject to Executive Management's approval.

## **9.0 EXCEPTIONS**

Request for Exceptions shall be initiated by the requesting Unit/Department through the supervising respective Group Heads to the MD/CEO for approval. Any policy exception request that is outside the provisions of this Manual or recurrent request for exceptions shall be processed and subsequently presented as an amendment to policy.

## 10.0 OTHER MATTERS

- 10.1 The name of the Officer(s) or Authorized Signatories signing official Bank documents shall be identified on the correspondence.
- 10.2 All correspondences/documents going out of the Bank must be signed by two officers of the Bank.
- 10.3 References may be made in this manual to Senior Officers (e.g. Group Head, Banking Services). These references are intended to specify the persons who perform such functions and are not intended to convey any particular official title or rank. The persons who perform these functions may be officials of any title or staff members specifically designated.
- 10.4 Cheques, drafts, and similar instruments shall be issued under two signatures, one of which must be an "A" signatory. Sole signatories may however, be established through special recommendation by Group Head, Banking Services and approved by Chief Operating Officer. In this case, a **"Second Signatory Not Required"** stamp shall be affixed on the Bank Cheque.
- 10.5 The Chief Financial Officer is responsible for determining which accounts will be used for recording all transactions and for ensuring that institutional requirements, regulations and as otherwise required, are met.

## **CHAPTER 2: BRANCH ADMINISTRATION SECTION I: GENERAL**

### **INTRODUCTION**

Branch networking is a deliberate strategy to expand and strengthen the business base of the Bank. The administration of each branch of Premium Trust Bank shall be the responsibility of two principal officers: Business Development Manager and Branch service manager; while Internal Control Officer ensures adherence to laid down policies and procedures.

The operating environment has been structured to enhance flexibility of policies and procedures, team spirit, acceptance of areas of joint responsibility and cooperation.

It also recognizes that separation of duties and chains-of-command provide the checks and balances needed to ensure smooth operation of the system.

This chapter therefore shall cover the administration of each branch of the Bank.

### **SECTION II: BRANCH MANAGEMENT**

#### **1.0 INTRODUCTION**

This section deals with guidelines to be followed by the principal officers in a branch: Branch development Manager (BDM); Branch Service Manager (BSM); Cash Officer; Transaction Officer (TO); Internal Control Officer (INTERNAL CONTROL OFFICER); Customer Service Officer (CSO) in the management of the branch.

#### **2.0 POLICY STATEMENTS**

- 2.1** The administration of each branch of Premium Trust Bank shall be the joint responsibility of the Business Development Manager (BDM) and the Branch service manager (BSM).
- 2.2** There shall be separation of duties and reporting lines between the BDM and the BSM to provide the checks and balances needed to ensure the smooth operation of the Branch.
- 2.3** The reporting line in the Branch shall be as follows: Business Development Manager (BDM) reports to the Regional Manager; Branch Service Manager (BSM) reports to the GH Banking Services and the Internal Control Officer (INTERNAL CONTROL OFFICER) reports to the GH Conduct & Compliance. The Executive Directors/Chief Operating Officer are the ultimate Heads of the different Directorates.
- 2.4** BSMs must not act as backups for BDMs and vice versa. If relief staff are needed, both shall process their requests through their respective reporting lines.
- 2.5** All Cash/Service Centers shall have at least three staff with a minimum of one permanent officer.
- 2.6** Every Cash Center/service shall be attached to a full-fledged branch for reporting and general administration.

- 2.7** The Permanent staff in a Cash/Service Centre shall be rotated at least once every two years while the Banking Associates (Tellers) shall be rotated regularly to ensure adequate checks and balances.
- 2.8** No staff of the Bank shall perform the functions of BDM, BSM or INTERNAL CONTROL OFFICER except advised by Human Resources.

### **3.0 RESPONSIBILITIES**

- 3.1** BDMs responsibilities shall include the development and management of business relationships and branch profitability. They shall also have the responsibility to ensure the smooth administration of the branch.
- 3.2** BSMs shall have the responsibility of ensuring excellent customer experience and increased customer base/business volume through quality service delivery and sales as well as efficient transaction processing in line with the Bank's policies and procedures.
- 3.3** Differences of opinion between the BDMs and BSMs shall be jointly referred to the next level of the respective reporting line. If the next level cannot resolve the issues, the referral process should continue until it reaches Executive Management through the Chief Operating Officer
- 3.4** Below is schematic presentation of the respective areas of responsibilities /joint responsibilities in the branch:

S/N	Activity	BDM	Joint Responsibility	BSM
1	Branch Profit and Loss		Yes	
2	Coordination of Branch Marketing activities	Yes		
3	Relationship Management		Yes	
4	Transaction Processing			Yes
5	Adherence to Policies & Procedures in Branch Operations		Yes	
6	Ensuring Quality Service Delivery in Branches		Yes	
7	Preparation of Annual Budget (including but not limited to operating expenses, capital expenditures, and personnel requirements)		Yes	
8	Credit facility approvals (for Branch Limits) in accordance with established policies	Yes		
9	Completion of periodic performance Appraisal for branch Marketing personnel	Yes		
10	Completion of periodic appraisal for branch operations Personnel, internal			Yes

	security guards, drivers and dispatch riders.			
11	Evaluation of effectiveness of contract workers, cleaners and external guards.		Yes	
12	Custody, repairs and maintenance of branch assets/premises		Yes	

### **SECTION III: RELATIONSHIP MANAGEMENT.**

#### **1.0 INTRODUCTION**

This section deals with guidelines for managing business relationships at the Bank's locations.

#### **2.0 POLICY STATEMENTS**

**2.1** Branches shall create and manage relationships in their locality.

**2.2** Business Development Managers (BDMs) with their Regional Managers shall have the overall responsibility to ensure that the branch fulfils its strategic business goals in accordance with the specific local and environmental peculiarities.

**2.3** The BDM shall be the Bank's official representative and therefore her spokesperson in the locality. However, the responsibility shall be carried out with the concurrence of the relevant departments (Corporate communications, Strategy, Legal Services, etc.).

**2.4** The processing of customers' requests shall be in line with laid down policies and procedures.

**2.5** BDM shall ensure that Relationship Officers develop a Relationship Management Plan (RMP) for notable customers - individual or corporate. The RMP defines the customer needs and the program of addressing the needs throughout the year.

**2.6** The RMP shall be signed off by the Relationship Officer and the BDM, but the BDM enforces implementation. The implementation of the RMP forms part of the basis of evaluating the performance of Relationship Officer and ultimately the BDM.

**2.7** Each call on a customer must be preceded and followed by call memos. The preceding call memos must state the objectives and targets while post visit memos must inform the results of the visit and issues to follow through.

**2.8** All marketing calls to a customer shall be undertaken by at least two Officers.

#### **3.0 RESPONSIBILITIES**

**3.1** The Business Development Manager is primarily responsible for the following duties:

**3.1.1** Supervision of customer relationship

**3.1.2** Credit and marketing functions of the Branch

**3.1.3** Development and management of the Branch's business, growth and profitability.

**3.1.4** Maintaining discipline of staff as well as the smooth administration of the branch.



- 3.1.5 Ensuring that the Branch opens for business daily.
- 3.1.6 Assigning accounts (account mapping) to Relationship Officers for proper management.
- 3.1.7 Ensuring quality service delivery in the Branch
- 3.2 The BDM is responsible to the Regional Head or in the administration of basic functions of:
  - 3.2.1 Relationship / Marketing
  - 3.2.2 Credit
  - 3.2.3 Administration and Human Resources
- 3.3 The BDM shall liaise effectively with corporate affairs/Strategy to ensure that promotional programs are adequate and in place.
- 3.4 The BDM as the Chief Credit Officer of the branch shall ensure that the Bank's Credit policy and procedures are adhered to and communicated clearly to his subordinates.

#### 4.0 OTHER MATTERS

- 4.1 **New Relationships:** In establishing any form of customer relationship, consideration shall be given not only to the potential profitability of the relationship but also to the character, moral and business reputation of the customer and any other social or political connections the customer might maintain.
- 4.2 **Relationship Game Plan (RGP):** The Relationship Officer (RO) together with the BDM shall prepare an Annual Relationship Game Plan which shall be approved by the Regional Head . The RGP shall detail key target market, the level of client contact proposed and the general strategies to be adopted for establishing and maintaining the relationship.
- 4.3 Customers should be categorized as:
  - i. Likely
  - ii. Very Likely
  - iii. Uncertain
  - iv. Unyielding

Monthly new names are added, unyielding prospects are dropped or prospects status is reclassified.

## SECTION IV: BRANCH OPERATIONS MANAGEMENT

### 1.0. INTRODUCTION

This section deals with guidelines for the management of the Operations functions in branches.

### 2.0. POLICY STATEMENTS

- 2.1 Branch Operations shall be set up for the purpose of direct supervision and control of core operations functions in branches with emphasis on regulatory compliance and the implementation of operational policies and procedures, as well as deliver timely, quality and effective customer service.

- 2.2 The duties of the Branch service manager (BSM) shall include supervising and coordinating the activities of all the operation units in the branch (Customer Service Unit; Transaction Unit; & Cash & Teller Unit), Supervises the onboarding processes and retention of customers. He/she MUST ensure that all alternate channels are up and running 24/7 .
- 2.3 The BSM shall ensure that the branch has adequate supply of both material & human resources. The BSM shall supervise the day to day running of operations in the branch.
- 2.4 The Schedule of duty of each Officer in the Operations Unit shall be documented and handed over to the Officer by the BSM. This shall be done in conjunction with Banking Services and Human Resources Group.
- 2.5 On the job training of all operations staff in the branch shall be the responsibility of the Branch service manager
- 2.6 All physical assets of the branch including the pool car shall be under the direct custodianship of the BSM.

### **3.0. OTHER MATTERS**

- 3.1 **General Supervision and Coordination:** The BSM shall ensure that:
  - 3.1.1 All operations staff resume by 7.30 a.m.
  - 3.1.2 All activities within the Operation Area are carried out as expected.
  - 3.1.3 Approval and authorization limits for operations staff as set from time to time are strictly adhered to.
  - 3.1.4 Work tools are properly kept at the end of the day and are used for the purpose for which they are meant for during working hours.
  - 3.1.5 All requests emanating from customers and other Units are scrutinized and signed off before being processed. The BSM must also sign off on cheques or withdrawal slips that are above signing limits of the various Unit Heads.
  - 3.1.6 Returned inward cheques and other items are not left in till boxes longer than 24 hours.
- 3.2 **Attending to Customers' Complaints.**
  - 3.2.1 The BSM shall ensure that all complaints received at the Branch are logged on the Complaint Management Portal (CMP) All complaints logged on the CMP must be resolved within 24 hours after which it shall be escalated.
  - 3.2.2 Every staff of the branch shall handle and resolve all customer complaints and queries, It is the duty of the BSM to pay keen attention to those complaints and find creative solutions to them.
- 3.3 **Reconciliation of General Ledger Accounts.**
  - 3.3.1 It is the responsibility of the BSM to ensure that the books are balanced before closing for the day. At the end of each day, the BSM shall ensure that Transit Accounts have zero balances (i.e. Interbank Cash GL, Transit BC,

Clearing Suspense, etc.).

### **3.4 Vault Administration**

- 3.4.1 The Custodians of the Vault shall ensure that cash is moved in and out of the Vault according to the policy on Cash Management & Vault Administration

### **3.5 Authorization of Transactions.**

- 3.5.1 The BSM & Cash Officer shall authorize transactions processed by the Operations staff in line with the approval and authorization limits as set from time to time for each category of Officers by the Group Head Banking Services . All processed transactions must be authorized on the system immediately by the designated Officers.

### **3.6 Management of Cash & Teller**

- 3.6.1 The Cash Officer shall be responsible for supervising the Tellers to ensure that cash related activities in the Branch are adequately managed.
- 3.6.2 The Cash Officer shall ensure that periodic cash movement in and out of the vault is within set limits.
- 3.6.3 The Cash Officer in conjunction with the BSM shall verify the closing cash position in vault at close of business and ensure its correctness with the Operating Cash GL balance.
- 3.6.4 The Cash Officer shall be the custodian of all cash related GLs, it is the responsibility of the cash officer to monitor all cash GLs daily and report anomalies to the BSM.
- 3.6.5 The Cash Officer shall ensure on the job training for all tellers.
- 3.6.6 The Cash Officer in conjunction with the BSM shall ensure the ATM is sufficiently loaded with cash. ATM cash and GLs shall also be appropriately reconciled.

## **SECTION V: WEEKEND BANKING**

### **1.0 INTRODUCTION**

- 1.1 The decision for any Premium Trust BANK branch to provide Weekend banking services shall be based on business justification. .
- 1.2 In determining its desirability or otherwise, the following factors amongst others shall form the basis of consideration:
  - i. Customer needs and convenience
  - ii. Market and business opportunities
  - iii. Competition
  - iv. Security and profitability.

### **2.0 POLICY STATEMENTS**

- 2.1 It shall be the responsibility of Business Development Manager in conjunction with Corporate Planning and Strategy to determine/assess the need for weekend banking in any of the branches while Internal Control Group shall review the

adequacy of security and control before take-off.

- 2.2** It shall be the prerogative of Executive Management to approve or decline request for weekend banking in any location.

### **3.0 OTHER MATTERS**

- 3.1 Scale Of Operations:** The scale of weekend banking operations shall be limited to the following:

- i. Account enquires
- ii. Cash Operations
- iii. Money transfer transactions
- iv. Account opening
- v. Account reactivation
- vi. Card issuance

- 3.2** The following customer services products shall not be available to customers during weekend banking:

- i. Issuance of bank cheque, Cards etc.
- ii. Treasury deposit placement or termination and
- iii. Cheque Clearing services
- iv. Cheque book issuance
- v. Foreign Currency transfer request

- 3.3** Notwithstanding the above, cheques brought to the Bank for clearing shall be accepted and stamped against the following workday and kept for clearing processing.

- 3.4** While restriction will not be placed on volume of cash operations during weekend banking, BDMs and BSMs are advised to exercise discretion and due caution in approving high volume cash payment. Where in doubt to pay or not, the respective Account officer or BDM should be contacted.

- 3.5** It shall be the responsibility of Banking Services Group together with corporate services in ensuring that branches running weekend banking have adequate insurance cover. No branch shall carry out weekend banking without insurance cover.

- 3.6** It shall be the responsibility of BSMs of branches running Weekend banking services to ensure that there is adequate security coverage during weekend banking.

- 3.7** The BSM or his Back-up shall strictly adhere to the Bank's procedures on vault administration during Weekend banking operations.

- 3.8** The BSM shall be responsible for managing the branch security gadgets and ensure that they are in good state and working properly and switched on daily before commencement of operations and switch off after close of business.

- 3.9** The Chief Security Officer of the Bank shall arrange for joint patrol of our Weekend banking branches by internal and external (police) security operatives.

#### **4.0 STAFFING**

3.10.1 Given the scope of weekend operations, it will not be necessary to have a full complement of staff; however, the minimum staff complements shall ensure that the branch administration policy of the Bank is strictly adhered to.

3.10.2 Weekend banking services shall be rotated amongst all staff in the branch. BSMs shall in conjunction with BDMs be responsible for drawing up a weekend banking roster at the beginning of each month and advise all staff accordingly.

**4.1 Hours of Operation:** weekend banking shall run from 12.00pm to 4pm (Saturday & Sunday) or as may be recommended by Group Head, Banking Service and approved by Executive Management

**4.2 Remuneration:** A reasonable allowance to cover transport and lunch shall be paid to each staff member on duty. This shall be determined and advised by Chief People Officer and Group Head, Banking Services with the approval of the Chief Operating Officer.

**4.3 Role Back up:** The following back up arrangement shall operate for weekend banking operations:

- i. **BSM** - to be backed up by Transactions Officer.
- ii. **Cash Officer** - to be backed up by CSO where such Staff is an officer of the Bank otherwise by the Transaction Officer.

#### **4.4 Handling of Vouchers**

Transaction tickets and vouchers for Weekend banking operation must be posted on the same day and handed over to the INTERNAL CONTROL OFFICER the following workday.

### **SECTION VI: TEMPORARY SUSPENSION OF BRANCH OPERATIONS**

#### **1.0 INTRODUCTION**

This section deals with the temporary suspension of branch operations necessitated by disturbed conditions and emergency situations.

#### **2.0 POLICY STATEMENTS**

2.1 The decision to suspend operations, either wholly or in part, during disturbed conditions that make conduct of operations impracticable will be made by the Group Head, Banking Services based on recommendation by the branch management with the concurrence of the Regional Manager with the final approval from the Chief Operating officer.

2.2 Where unforeseen circumstances warrant sudden suspension of operations without prior approval, the branch management through Group Head, Banking Services

shall inform the Chief Operating Officer immediately by the most expeditious means available, of the extent to which services have been suspended.,

- 2.3 The seriousness of the disturbed condition must be carefully evaluated before suspending operations either wholly or in part. The action taken by other banks in the area should be considered before decision is taken. However, the Group Head, Banking Services shall decide whether or not any services should be suspended. Additionally, the availability of police protection, the stability, and the physical location of the branch in relation to the disturbed condition must also be carefully considered.

- 2.4 In the situation mentioned above, the Group Head, Banking Services shall inform the Chief Operating officer, Head, Corporate Communication Chief Finance officer and the Managing Director/CEO.

Should a disturbed condition arise, careful consideration should be given to the activation of Business Continuity Plan in addition to the physical safe- guarding of bank assets.

## **CHAPTER 3: BRANCH CUSTOMER SERVICE**

### **SECTION I: GENERAL INTRODUCTION**

The concept of Customer Service was borne out of the need to promptly meet customers' needs with a view to getting repeat patronage, loyalty, and referrals from those who interact with the Bank in one form or the other.

All staff shall have the primary responsibility for ensuring that services are rendered to both existing and potential customers of the Bank in line with the Bank's service charter.

This chapter deals with customer interfacing services being rendered in branches. Every staff must therefore be thoroughly bred in customer relations.

This chapter covers the administration of the following key services offered by the Bank:

- i. Account opening
- ii. Term Deposit Booking and Termination
- iii. Customer request.
- iv. Capturing of customer signature and mandate on the system.
- v. Closure of accounts.
- vi. Stop payment orders (SPO) documentations.
- vii. Amendment on account.
- viii. Dormant Account Management.
- ix. Issuance of cheque books to customers.
- x. Statement of Account rendition.
- xi. Physically Challenged Customers

### **SECTION II: ACCOUNT OPENING**

#### **1.0. INTRODUCTION**

This section deals with the general rules and regulations guiding accounts opening, operations and control.

#### **2.0. POLICY STATEMENTS**

- 2.1 In opening new accounts or establishing any other forms of customer relationship, consideration shall be given not only to the prospective profitability of the relationship but also to the character/ business reputation of the customer, Regulatory dictates, and to any connections the customer might maintain.
- 2.2 Accounts shall be opened for customers at the Bank's discretion and upon satisfaction of the requirements for opening such category of account from time to time.
- 2.3 It shall be the responsibility of the Officer opening the account to ensure that all documentations required for the opening, maintenance and operation of that

account have been obtained.

- 2.4 No account with incomplete documentation shall be operated except with deferrals approved in accordance with this policy. All such accounts with deferrals shall be placed on '**Post No Debit' status (PND)** immediately pending regularization.
- 2.5 Deferral of account opening documents shall be strictly for exceptional, properly justified cases and with the approval of Regional Heads only. **BDMs approvals will not suffice for any account opening document deferral.** Deferral shall not be allowed for any walk-in customer
- 2.6 Notification and reminders in respect of deferred documents shall be sent to the Relationship Officers, Approving Officers, and the affected customers.
- 2.7 All original documents submitted for account opening must be duly sighted and the name and signature of the officer noted on copies of the original document to be retained by the Bank.
- 2.8 Unique account identification (i.e. account number) shall be assigned to every account at the point of account opening.
- 2.9 All corporate current accounts must have searches conducted on them within 48 hours of being opened. If the search report is not favorable, the account shall be blocked pending when the irregularity is resolved by the customer. Where the irregularity cannot be resolved within two weeks, such account shall be closed, and balance returned to the prospect in the form it was received.
- 2.10 All accounts opened must have documentation evidencing residential or mailing address (Not P.O. Box). Relationship Managers or other approved parties are responsible for verifying the existence of such addresses through physical visitations. The Account Officer and BDM must jointly sign on the visitation report.
- 2.11 A personal identification and verification of such identity will be taken of all signatories of all categories of accounts except tier 1 accounts. Adequate due diligence must be carried out on Key Directors and signatories to Corporate Accounts as in the case of individual accounts i.e. due diligence shall be required on individual persons operating corporate accounts to complete the KYC cycle. Please refer to the Bank's KYC and AML manual for further guidance.



### 3.0 DOCUMENTATIONS

3.1 **Account Opening Forms:** Any prospective customer who intends to open an account with the Bank must complete an account opening form. The form is the basic document which evidences the customer's intended relationship with the Bank except such accounts are opened on our digital channels

3.1.1 Where the customer is not literate, the Customer Service officer should complete the Account Opening Form.

3.1.2 The details of the account opening form are important because the Bank/Customer relationship is initially based on it. Therefore, due attention should be given to the accuracy of the details as potential problems could arise from incorrect data.

3.1.3 The Relationship Officer/Manager shall, at the point of receiving the completed account opening form, ensure that the customer clearly understands any special instructions regarding the operations of the account.

3.2 **References:** Depending on the type of account, the prospect shall be required to produce two suitable references before the operation of an account. The following class of persons can provide acceptable references:

3.2.1 Any customer of the Bank who has maintained a current account with the Bank for not less than 6 months. During the period, the account must have been satisfactorily operated, and all documentation requirements met.

3.2.2 A Customer of another bank can also reference a prospect. Such references must be certified suitable by his bankers before the account can be made operational.

3.2.3 The two references can be internal or external or a combination of both.

3.2.4 No member of staff shall act as a referee for any prospective customer.

3.2.5 No member of staff shall request/solicit any existing customer of the Bank to act as a referee to a prospective customer.

3.2.6 An individual current account holder can reference another individual current account and sole proprietorship prospect provided the sole proprietor is the sole promoter of the business entity.

3.2.7 Sole Proprietor cannot reference a Limited Liability Company/Public Quoted Company

3.2.8 A corporate current account can reference any class of account.

3.2.9 Only references from corporate accounts shall be acceptable for prospective corporate accounts.

3.3 **Means of Identification:** The acceptable means of identification for Account Opening purposes shall include:

- i. Valid National Driver's License
- ii. Valid International Passport

- iii. Valid National Identity Card
  - iv. Valid Voter's Registration Card
  - v. Any other form of identification approved by the government, regulatory authorities, or Management from time to time.
- 3.4 **Search Report:** A search shall be carried out on every Corporate Account before the account can become fully operational. The search confirms that the company or business is indeed registered and is an existing legal entity.
  - 3.4.1 The search also confirms other details of the prospect like, Directors, RC Number, Address, ownership etc.
  - 3.4.2 The search report shall be compared with the information earlier submitted by the customer. Any conflict must be satisfactorily resolved otherwise, the account shall be closed. The remarks of the Solicitor who conducted the search shall also be noted and taken into consideration.
  - 3.4.3 The Company Secretary/Legal Adviser shall coordinate the conduct of searches on corporate accounts for the Bank.
- 3.5 **Memorandum and Articles of Association (MEMART):** The Memorandum of Association contains the objectives of the company while the Articles of Association contains the rules governing the operation of the company.
  - 3.5.1 The MEMART must be certified by the Corporate Affairs Commission (CAC) as the true copy.
  - 3.5.2 Before accepting a copy of the MEMART the original must be sighted by the Relationship Officer/Customer Service Officer/ BSM/any other staff of the Bank. The Officer sighting must remark this on the Bank's copy and sign off indicating his full name.
  - 3.5.3 There must be consistency between the information in the MEMART and the information in the other documents provided by the Prospect.
- 3.6 **Form CAC7/CO7 (PARTICULARS OF DIRECTORS) or CAC2.3 (PARTICULARS OF FIRST DIRECTORS):** This specifies the Directors of the company and assist to evidence persons authorized to run the organization.
  - 3.6.1 The Form CAC7/CO7 must be certified by the Corporate Affairs Commission (CAC) as the true copy.
  - 3.6.2 Before accepting a copy of the Form CAC7/CO7, the original must be sighted by the Relationship Officer, Customer Service Officer or BSM or any other staff of the Bank. The Officer sighting must remark on the Bank's copy and sign off indicating his full name.
  - 3.6.3 There must be consistency between the Form CAC7/CO7 and other information provided in the other documents or information submitted by the Prospect.
- 3.7 **Form CAC2/CO2 (ALLOTMENT OF SHARES):** This specifies the shareholding structure

of the Company.

- 3.7.1 The Form CAC2/CO2 must be certified by the CAC as the true copy.
- 3.7.2 Before accepting a copy of the Form CAC2/CO2, the original must be sighted by the Relationship Officer, Customer Service Officer or BSM or any other staff of the Bank. The Officer sighting must remark on the Bank's copy and sign off indicating his full name.
- 3.7.3 There must be consistency between the information in the Form CAC2/CO2 and the information provided in other documents or information submitted by the Prospect.
- 3.8 **Certificate of Incorporation/Certificate of Registration:** This is a legal proof that the company is duly registered and recognized by law.
  - 3.8.1 The original copy of this must be sighted by the Relationship Officer/Manager, Customer Service Officer or BSM or any other staff of the Bank and returned to the customer.
- 3.9 **Board Resolution:** This specifies the company's resolution to commence a banking relationship with the Bank. It would also name the authorized signatories to the Account. A valid Board Resolution should have the following features:
  - 3.9.1 The venue of the meeting must be stated (preferably registered office of the company).
  - 3.9.2 The date of the meeting must be stated
  - 3.9.3 The resolution must be signed by two Directors of the company or by a Director and the Company Secretary (Company Secretary Signature will only be acceptable if evidence of filing of Form CAC 2.1 – Particulars of Secretary is furnished).
- 3.10 **Visitation Report:** This is a proof of the true location of the customer's residence/business.
  - 3.10.1 It must be carried out by an Officer in the Business function, or any other person designated by the Bank on every account opened and the report must be submitted within forty-eight hours before the account shall become fully operational.
  - 3.10.2 Relationship Officers shall be liable on issues arising from false visitation reports submitted by them.
  - 3.10.3 It will be sufficient to insert the site visitation report in the KYC document.
  - 3.10.4 Account may be opened and placed on PND pending when visitation report will be in place.
- 3.11 **Passport Photograph:** The passport photograph shall be affixed to the appropriate place on the Mandate Card and crossed stamped "PREMIUM TRUST BANK LTD." over the face (care must be taken to ensure that the photograph is not defaced). The stamp must be affixed in such a way as to ensure that unauthorized/fraudulent

removal or substitution of the passport would be noticeable.

- 3.12 **Current Accounts:** Overdrafts, drawings against unclear effects (uncollected funds) or excesses over approved lines must be approved in line with the Credit Policy Manual.

**3.13 Savings Account**

- 3.13.1 No Savings Account shall be overdrawn
- 3.13.2 Negotiable instruments to the tune of N2million cumulative daily shall be accepted into Tiers 3 accounts. No negotiable instrument shall be allowed into Tier 1 and 2 accounts.
- 3.13.3 Negotiable instruments shall be accepted on hybrid Savings Accounts without two suitable references to the tune of N2million naira cumulative daily. Two suitable references shall be provided for lodgments of negotiable instruments above N2million. Minimum balance shall continue to be reviewed for different types of Savings Accounts.
- 3.13.4 Withdrawal from Tier 1 and Tier 2 Savings Account shall only be done by the account holder. Only Tier 3 savings account holders can issue cheques to third party.
- 3.13.5 Management shall from time to time review the form of identification required for this category of account in line with regulatory requirements.

- 3.14 **Staff Account:** These are accounts opened for staff in the employment of Premium Trust Bank. The accounts are opened on resumption of duties of a staff who is employed in Premium Trust Bank from the Head office.

- 3.14.1 The documents required for opening such accounts are basically the letter of employment and one recent passport photographs of the newly engaged staff.
- 3.14.2 Staff Accounts shall be opened/closed by the branch upon advice by HR. Additional accounts by staff shall be allowed subject to disclosure of such accounts to the People Management Group. Required documents for that account shall be provided by such staff. All accounts in the staff name must be linked.
- 3.14.3 Service charges and COT/AMF shall not be taken on staff accounts.
- 3.14.4 Internal Control are empowered to investigate any large inflow (unusual/high volumes) into Staff account periodically or at any time.
- 3.14.5 **Staff Account shall not be overdrawn.** An un-retired cash advance debited to staff account after the due date shall not be an allowable reason for staff accounts to be in debit.
- 3.14.6 Staff domiciliary accounts shall not be used for foreign exchange transactions on behalf of third parties.

- 3.14.7 In line with the Laws of the Federal Republic of Nigeria, Dud cheque is not allowed on staff Account.

### **3.15 Management of Walk-In Customers:**

- 3.15.1 **Walk- in Customer:** This is a customer who was not directly marketed by any officer of the Bank but has indicated intention to commence a banking relationship with the Bank.
- 3.15.2 Corporate Accounts for walk-in customers shall be opened subject to strict compliance with the Bank's Account opening policy and after a thorough interview of prospective customer by the CSO.
- 3.15.3 All Account opening documentation must be in place before it shall become operational.
- 3.15.4 No deferral shall be allowed on any account for walk-in customers.
- 3.15.5 BSM/Customer Service Officer shall ensure that the customer's address confirmation (visitation) is done by the Relationship officer or any designated officer for all Tier 3 accounts.
- 3.15.6 On a regular basis, a random sample of walk-in customers shall be selected by the INTERNAL CONTROL OFFICER for the purpose of independent verification of the information provided both by the customer and by the Relationship Officer/Manager during the Account opening process.

### **3.16 TYPES OF ACCOUNTS**

- 3.16.1 Savings account
- i. Regular Savings Account (Tier 1, 2 & 3)
  - ii. Hybrid Savings Account
- 3.16.2 **Current Account**
- i. Individual Current Account
  - ii. Corporate Current Account
  - iii. Partnership
  - iv. Sole Proprietorship (All Enterprise Account)
  - v. Trustees, Executors and Administrators
  - vi. Associations, Societies and clubs

- vii. Other Non-Profit Making Organizations
- viii. Domiciliary Accounts
- ix. Government/Parastatals Accounts
- x. External Accounts
- xi. Non-Resident Accounts

### **3.17 Accounts Opening Documentation Requirements**

#### **3.17.1 Savings account**

##### **a. Tier I Savings Account**

- i. Completed Account Opening Form
- ii. One recent passport photograph

##### **b. Tier II Savings Account**

- i. Completed Account Opening Form
- ii. One recent passport photograph
- iii. Verifiable ID Card
- iv. Visitation Report
- v. BVN

##### **c. Tier III Savings Account**

- i. Duly completed account opening application form
- ii. BVN
- iii. One recent passport sized photograph of signatory.
- iv. Valid means of identification of signatory
- v. Premises visitation Report
- vi. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc)

#### **3.17.2 Term Deposit Account**

- i. Term Deposit application form/Customer's instruction.
- ii. One signature card
- iii. BVN
- iv. One recent passport photograph  
Valid means of identification of each signatory
- v. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc)

#### **3.17.3 Individual Current Account.**

- i. Account opening application form.
- ii. One recent passport photograph.
- iii. Valid means of identification
- iv. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc)
- v. Resident permit issued by the Immigration Authorities (Expatriates).
- vi. Two reference forms
- vii. Visitation Report

#### **3.17.4 Salary Accounts**

- i. Completed account opening form with customer mandate card.
- ii. One recent passport photograph

- iii. Reference letter from the Employer, which must be a company of good repute in place of satisfactory references on the account holder.
- iv. Means of identification, preferably the company's means of identification.
- v. Independent verification shall be carried out within forty-eight hours on the Employer to confirm that the Salary account holder is a staff and duly authorized to open salary account with the Bank. In addition, address check details must be taken on the company. The company shall be written to advise the Bank of change in situation of the staff, such as resignation etc. so that the salary account can be closed and new one opened to reflect change in status, if the customer so desires.
- vi. Premises visitation Report (office).

### **3.17.5 Non-Literate Customers:**

3.17.6.1 Non-literate customers without signature can open and operate both savings and current account. This shall subject to the fulfilment of the following conditions:

- i. The account holders shall only make such withdrawals in person, (not by proxy and or via a third party) at any of the Bank's branches.
- ii. In all cases of withdrawal, Paying Tellers are required to reconfirm the owner of such accounts through the information on the system.

3.17.6.2 An Illiterate customer who intends to allow a Literate person to operate his account shall be required to submit a duly notarized Power of Attorney.

**3.17.6.3** Where an Illiterate person intends to open a joint account with a Literate person, such account must be opened with the condition that it will be operated by **"both to Sign" mandate.**

### **3.17.6 Limited Liability Company -Current Account**

- i. Account opening application form.
- ii. Two reference forms
- iii. Board resolution to open account.
- iv. One recent passport photograph of each signatory

- v. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc) of the company
- vi. BVN of each Signatory to the Account
- vii. BVN of all the Directors
- viii. Certified True Copy of Certificate of Incorporation
- ix. Certified True Copy of Memorandum and Article of Association.
- x. Certified True Copy of form C07/CAC7 (particulars of Directors) and C02/CAC2 (Allotment of shares).
- xi. Legal search report
- xii. Residence permit issued by the immigration Authorities (Expatriates).
- xiii. Valid means of identification of all signatories
- xiv. Valid means of identification of all Directors and Shareholders above 5%
- xv. Proof of address Power of Attorney (Where applicable)
- xvi. Copy of certificate of commencement of Business (where applicable).
- xvii. Premises visitation Report of the company
- xviii. Letter of authority to conduct search on the company.
- xix. Evidence of Registration with Special Control Unit on Money Laundering (SCUML) for all Designated Non- Financial Businesses and Professionals (DNFBP)- Where applicable
- xx. Tax Identification Number (TIN)

### **3.17.7 Partnership Accounts**

- i. Account opening application form
- ii. One recent passport photograph of each signatory
- iii. BVN of each Signatory
- iv. TIN of the partnership
- v. Two reference forms
- vi. Copy of certificate of registration of Business Name
- vii. Copy of Search report
- viii. Mandate from Partnership authorizing opening of account
- ix. Copy of the form containing particulars of partners
- x. Valid means of Identification of partners
- xi. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc)
- xii. Residence permit issued by Immigration Authorities (Expatriates)
- xiii. Copy of Partnership Deed (where applicable).
- xiv. Premises visitation Report.
- xv. Membership certificate of professional body (If any)
- xvi. Letter of authority to conduct search on the partner.
- xvii. Evidence of Registration with Special Control Unit on Money Laundering (SCUML) for all Designated Non- financial Businesses and Professionals (DNFBP)- Where applicable

### **3.17.8 Sole proprietorship (All Enterprise Account)**

- i. Account opening application form
- ii. One recent identical passport photographs of each signatory
- iii. Two reference forms
- iv. BVN of all signatories
- v. Certified copy of certificate of registration of Business Name
- vi. Copy of Forms for application for Registration of Business Name
- vii. Search report
- viii. Valid means of Identification
- ix. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc)



- x. Residence permit issued by Immigration Authorities (Expatriates)
- xi. Premises visitation report
- xii. Letter of authority to conduct search on the business name.
- xiii. Membership certificate of professional body (If any)
- xiv. Evidence of Registration with Special Control Unit on Money Laundering (SCUML) for all Designated Non- Financial Businesses and Professionals (DNFBP)- Where applicable

**3.17.9 Bureau De Change and Micro-Finance Company:** Bureau de change and Micro-Finance Company are subject to CBN regulations; they must also be verified in accordance with the procedures for other Financial Institutions. In addition to the requirements for opening corporate accounts, customers shall be required to provide a copy of their operating license.

#### **3.17.10 Trustees, Executors and Administrators**

- i. Where an account is opened for the purpose of winding up the Estate of a deceased person, the identity including references of the executor[s]/administrator[s] of the estate must be verified.
- ii. Client Accounts are opened by registered Professional intermediaries.
- iii. Stockbrokers, Solicitors, Accountants, Estate Agents and other intermediaries hold funds on behalf of their clients in "client accounts" opened with financial institutions. In each of these cases, it is the registered professional intermediary that is our customer.
- iv. Where the professional intermediary is not regulated under the Money Laundering Regulations, we would not only verify the identity of the professional intermediary but also of the person on whose behalf the professional intermediary is acting. The identification shall include proper referencing and address verification check.
- v. Where it is impossible for us to establish the identity of the person[s] for whom the Solicitor or Accountant or Estate agent is acting, we shall place on the account "Post no debit" (PND) memo and make necessary report to relevant authorities.

#### **3.17.11 Associations, Societies and Clubs**

- i. Account Opening application form
- ii. Two reference forms
- iii. one recent identical passport photograph
- iv. Means of identification of signatories
- v. BVN of Signatories
- vi. Copy of the constitution
- vii. Copy of Rules and Regulations (where applicable)
- viii. Resident permit issued by the Immigration Authorities (Expatriates)
- ix. Copy of Certificate of Registration.
- x. Letter of Resolution by the Board of Trustees to open account or
- xi. Copy of recently adopted minutes of meeting
- xii. Premises visitation report
- xiii. Power of Attorney (where applicable).
- xiv. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc) (PHCN, Water bill, Waste disposal bill, tenement etc.)

**3.17.12 Non-Registered Organizations/Town Union Meetings/ Market Associations:** Some informal groups that are associating together for the purpose of their own welfare may or may not need to be registered with any Government agency before they can operate a bank account. This can be in the form of Town Unions, market associations, Age Grades etc. Such groups may need to open an account for the purpose of their financial transactions. In this case a standard savings account may suffice with the under listed requirements:

- i. Account Opening application form
- ii. one recent identical passport photograph of each signatory
- iii. Means of identification of signatories
- iv. Copy of the constitution
- v. Copy of Rules and Regulations (where applicable)
- vi. Letter of resolution by the Executive members of the Association to open account or copy of recently adopted minutes of meeting.
- vii. Premises visitation reports (office of the association & residence address of the signatories to the account).
- viii. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc) of signatories to the account/association

**3.17.13 Other Non-Profit making Organizations (NGOs)**

- i. When dealing with application from registered charity, churches, mosques etc., we must obtain and confirm the name and address of the organization concerned.
- ii. Where such organization is opening a current account, full account opening documentation and the identity of the signatories must be obtained.
- iii. Two reference forms.
- iv. Copy of certificate of registration
- v. Copy of the constitution/bye laws
- vi. Resolution of Board of Trustees authorizing the opening of the account and appointing signatories.
- vii. Address verification shall be carried out on such accounts in line with KYC/KYCB.
- viii. Evidence of Registration with Special Control Unit on Money Laundering (SCUML) for all Designated Non-Financial Businesses and Professionals (DNFBP)- Where applicable

**3.17.14 Domiciliary Accounts – Current Account**

- i. The account opening documentation shall be as stated for current accounts.
- ii. KYC/KYCB documentations shall be current and regularly updated and this shall be the responsibility of the account officer and BDM.

**3.17.15 Domiciliary Accounts – Savings Account**

The account opening documentation shall be as stated for savings accounts.

**3.17.16 Government/Parastatal Accounts: Federal/State Ministries and Departments**

- i. Account Opening application form.
- ii. one recent passport photographs of each signatory
- iii. Letter of Authority to open account from the Accountant General of the Federation (AGF)/State Accountant General (SAG) as the case may be and/or Mandate forms countersigned by AGF or SAG.
- iv. Valid Means of Identification of signatories
- v. Completed mandate signed by the Chief Executive of the Ministry/Department.
- vi. Approval by the Business, Regional Head in the Region

**3.17.17 Government/Parastatal Accounts: Agencies and Parastatals (Federal/State Agencies)**

- i. Account opening application form
- ii. One passport photograph of each signatory.
- iii. Valid means of Identification of each signatory:
- iv. Letter of request to open account, issued by the Chief Executive of the parastatal.
- v. Board Resolution to open account.
- vi. Mandate forms countersigned by the Chief Executive of the Agency, Corporation or Commission.
- vii. Mandate forms countersigned by the Accountant General of the Federation/State Accountant General.
- viii. Premium Trust Bank Management Approval
- ix. Approval by the Business, Regional Head in the Region

**3.17.18 Government/Parastatal Accounts: Local Government**

- i. Account opening application form
- ii. one Passport photograph of each signatory
- iii. Letter of request to open account signed by the Chairman and Secretary.
- iv. Council Resolution to open Account with Premium Trust bank
- v. Valid means of identification of each signatory
- vi. Approval by the Business, Regional Head in the region

**3.17.19 Hybrid (Specific Product) Accounts:** These are accounts that are operated under special products of the Bank. Such accounts have the combined features of both savings and current account in some instances. The requirements for opening such accounts are as contained in the approved product papers. It must however satisfy the basic requirements as stated in the approved policy of the Bank and CBN/other Regulatory Bodies as may be required.

**3.17.20 Liquidation/Receivership** - The documents required will be determined by the nature of the appointment of the Receiver of Liquidator:

- a. Where the Receiver is appointed by a court: - Court Order appointing him together with other necessary documents required for account opening.
- b. Where Receiver is appointed by a creditor: - Confirmation letter from the Corporate Affairs Commission, Deed of Appointment and other account opening documents.

- c. Where an Official Liquidator or Liquidator is appointed by the court:
  - the Court Order so appointing him in addition to other account opening documents.
- d. In the case of a voluntary winding up, the Board Resolution and the extract of the meeting where the decision was taken should be obtained including the return filed with the CAC.

Any Court order or CAC document presented in respect of the above must be certified by Legal Services Department.

#### 4.0 **OTHER MATTERS**

- 4.1. Branch Controls shall be responsible for the monitoring of deferrals on accounts and send reminders to Relationship Officers and the approving Officer on a deferred document.
- 4.2. All completed account opening forms and supporting documents shall be submitted to the Customer Service Officer for necessary action. The CSO shall review account opening forms and accompanying documentations for completeness by referring to the account opening checklist.
- 4.3. The passport photographs of all account signatories shall be endorsed at the back with the name and signature of the customer.
- 4.4. CSO shall ensure that the signature and mandate instruction as stated by customer is unambiguous (clear), easy to understand and apply.
- 4.5. The BSM shall be responsible for ensuring that satisfactory references are obtained on new accounts. This shall be done before such accounts can be operated and cheque book issued.
- 4.6. It shall be the responsibility of both the BSM and the CSO to follow up on search report with Legal Services Department on corporate accounts. They shall ensure that not only is the report timely and satisfactory but that the details of the search report are in line with what is on MEMART and C07/CAC7 supplied by the customer.
- 4.7. The CSO shall ensure that there is an initial deposit on the account to be opened to cover the cost of cheque book for individual current accounts. For Corporate accounts, the cost of cheque book and legal search must be in place at the time of opening the account.
- 4.8. Each account opening request/mandate file must be reviewed and approved by the BSM and BDM/Head of Relationship before the account is opened. The BSM shall be accountable for all accounts opened at the branch and therefore shall at all times ensure that all accounts opened in the branch conform to the requirements under each account type as contained in this document.
- 4.9. The CSO shall ensure that the independence of the referee is not compromised. Hence, related parties shall ordinarily not be accepted as referees. No cheque

book or other privilege of banking relationship would be accorded to the customer until two satisfactory letters of reference are received by the Bank.

- 4.10. All accounts opened daily shall be allocated by the BDM to Relationship Officers for relationship management while the INTERNAL CONTROL OFFICER shall review for adherence

## **5.0 Multiple Accounts by Customers**

- 5.1 Customers shall be allowed to maintain multiple accounts due to their diverse needs which may not be met by a single account. However, all such accounts attributable to a single customer shall be linked together by a single customer ID and attached to one Branch.
- 5.2 Where there is a need to duplicate an existing account across network, the approval of the respective Regional Managers of Business shall be obtained.
- 5.3 **BSM shall ensure that before new accounts are opened, the system is scanned for any existing account owned by the same customer, with a view to linking them together in the same branch.**
- 5.4 The requirement for opening multiple accounts for Individual customer is a duly completed add-on form by the customer.
- 5.5 The requirement for opening multiple corporate accounts are:
- i. Board Resolution
  - ii. Letter of request from the company

## **SECTION III: TERM DEPOSIT BOOKING & TERMINATION**

### **1.0 INTRODUCTION**

This section deals with interest bearing deposits for fixed amount at fixed rates, repayable at fixed future date or upon prior notice. Deposits under this category shall include Fixed Deposit, Call Deposit, Bankers' Acceptance and other Money Market instruments as may be approved by Executive Management.

### **2.0 POLICY STATEMENTS**

- 2.1 All Term Deposit bookings shall be done from customers or suspense (for walk-in customers) accounts in line with customer's written instruction.
- 2.2 Funds must be available in the source account by the transaction value date.
- 2.3 All deposits shall be terminated into the source accounts only.
- 2.4 All Tenured Deposits must be booked in line with the approved rate guide as advised by the Bank's Treasurer from time to time.
- 2.5 Rate for Call Deposit Placements shall require the approval of the Bank's Treasurer.

- 2.6 All matured deposits for non-account holders shall be paid to the customer in the form in which the deposit was received into the Bank.**

### **3.0 OTHER MATTERS**

- 3.1 Term Deposits shall be booked for approved duration as advised by the Bank's Treasurer.
- 3.2 All instructions on Hypothecated deposits shall be approved by the Head, RMG before it can be processed by the Branch.
- 3.3 No deposit above rate guide shall be booked without the approval of the Bank's Treasurer
- 3.4 Booking/Termination of deposits without customer's written instruction or through registered email address shall require the approval of the Regional Manager.
- 3.5 Deposit Certificates detailing Principal amount, Interest rate, Tenor and Maturity date shall be generated for customers evidencing the booking of the deposit
- 3.6 Pre/partial termination of deposits before maturity shall attract advised penal charge.
- 3.7 Rate enhancement after obtaining the Head, Treasury Department's approval can only be back dated to the last rollover date.
- 3.8 All matured Deposits shall be automatically rolled over at the prevailing interest rate except otherwise instructed by the customer.
- 3.9 Non-account holders shall be required to complete a Fixed Deposit account opening form, mandate card with a recent passport photograph affixed in addition to a written instruction.
- 3.10 Non-account holders shall also be required to provide necessary documents in line with the KYC requirements.
- 3.11 In line with the Bank's policy on multiple accounts, all Term Deposit Bookings must be linked to the source accounts and attached to one branch.

## **SECTION IV: CUSTOMERS ENQUIRIES**

### **1.0. INTRODUCTION**

This section deals with the guidelines for handling enquiries made by customers of the Bank.

### **2.0. POLICY STATEMENTS**

- 2.1 The Bank shall ensure strict confidentiality in handling customers' enquiries.
- 2.2 Customer's account balance shall only be disclosed to account holder after necessary verification.
- 2.3 Responses to enquiries regarding information about a customer of the Bank shall not be

given to unauthorized persons. However, such information can be disclosed to third parties by Compulsion of law, or in the interest of the Bank. Such disclosure must be with the approval of Group Head, Internal Control & Compliance, Group Head Banking Services and the Chief Operating officer

- 2.4 The balance on a customer's account shall be given over the telephone only by an officer, unit head, or designated employee, after being satisfied as to the identity and right of the inquirer to such information.
- 2.5 No status opinion or reference on the credit worthiness or otherwise of any customer shall be issued without the concurrence of the Group Head, Internal Control & Compliance and Group Head, Banking Services
- 2.6 Responses to all enquiries on customers' status by other banks, regulatory agencies or other organizations shall be forwarded to the Group Head, Internal Control & Compliance.
- 2.7 The approval of the BDM of the branch where the customer's account is domiciled shall be required for processing all status enquiry requests.
- 2.8 Where confidentiality is required, the Bank will only respond when compelled by law to do so. This must be referred to the Legal department for professional advice.

### **3.0. OTHER MATTERS**

- 3.1 **Response to Reference Letter:** BSMs shall comply with the following in respect of response to references on customers of the Bank:
  - 3.2 On no account shall reference be given on any account that is less than 6 months or dormant except with the approval of the Regional Head, Business and Group Head, Banking Services. **Such account must have complete documentation in place.**
- 3.3 Reference Letters shall be signed by two Authorized Signatories of the Bank.
- 3.4 A copy of the reference letter must be filed appropriately.
- 3.5 All reference letters must be in accordance with approved format as advised by the Bank. Any deviation must be approved by the Legal Department

## **SECTION V: CUSTOMER COMPLAINTS**

### **1.0 INTRODUCTION**

This section deals with the handling of customers' complaints about the service quality of the Bank and the general attitudes of officers are used as feedbacks towards improved service delivery and excellent customer experience

### **2.0 POLICY STATEMENTS**

- 2.1 The Bank shall provide various avenues for customers to register their complaints about the Bank's products and services.

- 2.2** To address customers' complaints arising from the unsatisfactory service delivery and unfriendly staff attitude, a dedicated line and email address shall be provided for customers to lodge such complaints.
- 2.3** The Bank shall receive all Customers' complaint letters and supporting documents (when available) through recognized channels.
- 2.4** The Receiving Officer irrespective of location shall be required to log complaint details on the Complaints Management Portal (CMP) irrespective of whether it is a new case or an existing one.
- 2.5** The receiving Branch/Unit/Department shall send an acknowledgement letter to the customer within 24 hours of receipt of complaint.
- 2.6** Where complaint is received from a Solicitor, Banking Services Group shall forward same to Legal Services Department and liaise with Legal to draft appropriate response within 24hrs of its receipt.
- 2.7** All customers' complaints must be resolved within 5 working days. Where resolution of any complaint extends beyond 5 working days, customer shall be duly notified.

## **SECTION VI: ACCOUNT AMENDMENTS**

### **1.0 INTRODUCTION**

This section deals with the guidelines for accepting requests from customers in respect of modification/Amendments in account mandates and customers' information.

### **2.0 POLICY STATEMENTS**

- 2.1** The customer shall be at liberty to change his mandate provided all required documents to ascertain the genuineness and authenticity of such changes are provided.
- 2.2** All Account mandate change instructions shall emanate from the customer and shall be clearly stated in writing and signed in line with the existing mandate for individual accounts while a duly executed board resolution is required for corporate accounts.

### **3.0 DOCUMENTATION**

- 3.1** Where there is a change in mandate information of a Corporate Account, occasioned by addition to the list of signatories, board resolution introducing new signatories to operate the account MUST be provided and signed by a director and the Company Secretary/two directors. The customer shall be required to complete a new mandate card to reflect the change in account mandate. All the new signatories must provide their BVN and their utility bills (Proof of Address)
- 3.2** Where there is a change in mandate of a public sector account, in addition to standard required mandate change documents the approval of the Appointing Authority/Chief Executive of the Agency; The Accountant General of the Federation (AGF)/State Accountant General/(SAG). The approval of The Head-Public Sector / Regional Manager / Group Head (depending on the structure in



- the location) is required.
- 3.3** Where there is a request for modification in account name the customer shall be required to complete a new account opening form along with a request letter duly signed according to present mandate.
- 3.4 Change of Name/Title**  
Such include change of name, change through marriage, and change in company name or from individual account to joint account.
- 3.4.1 CSO shall request for a copy of relevant Board Resolution for Corporate Customers and change of name certificate from CAC.
- 3.4.2 For individuals, change of name for any reason shall be evidenced by an affidavit and Newspaper Publication in a recognized national daily. BVN Print out can also be used with it.
- 3.5 Conversion of Account**
- 3.5.1 Conversion of individual account into joint account shall be allowed.
- 3.5.2 For all such accounts Fresh Account Opening forms duly signed by all the proposed Joint Account Holders must be obtained along with a letter of request for such conversion into Joint Account from the existing single Account Holder
- 3.5.3 Recent passport size photographs of all Account Holders must be obtained
- 3.5.4 The names of the Joint Account Holders must be added on the system. Operational instructions like "Either or Both" /jointly must also be entered.
- 3.5.5 Conversion of joint account into individual account shall not be allowed.
- 3.6 Change of Signature Mandate**  
Change of signature shall be evidenced by customer's written instruction for individuals and board resolution for corporate accounts. BSM, upon receipt of letter/ Board Resolution requesting for change in signature mandate shall execute in line with the Bank's approved process.
- 3.6.1 Customers requesting for change of signature shall be required to sign the old and new signatures in their letter of request.
- 3.6.2 Customers who cannot sign the old signature shall be required to provide an affidavit.
- 3.7 Change of Passport Photograph**  
Where there is a need to change a customer's passport photograph, the customer shall be required to provide a recent passport photograph and complete the Customer Information Update form. This shall be reviewed and verified by the BSM for processing. The BSM shall indicate on the form that the request is for picture change.

### **3.8 Change of address**

Where there is a change in a customer's account address, a premises visitation must be conducted after provision of proof of address.

### **3.9 Change of Phone number**

Where a customer wants to change his/her phone number, a written instruction must be presented to the CSO and CSO is expected to pass it on to the BSM for necessary approval after the BVN verification of the customer has been carried out by the CSO. To change a customer's phone number, the GH Banking services or through his designated officer must approve.

## **SECTION VII: STATEMENT OF ACCOUNT RENDITION.**

### **1.0 INTRODUCTION**

This section deals with rendition of statements of accounts to customers at specified intervals.

### **2.0 POLICY STATEMENTS**

- 2.1** The Bank shall render statement of account to her customers on monthly basis or on demand through a printed copy or any other mode as specified by the customer.
- 2.2** The Bank shall ensure that rendition of customers' statement of accounts is done within first week of each month except where the customer specifically requests the Bank to place hold on it. The system shall not print, "Hold statement".
- 2.3** The Group Heads, Banking Services and Internal Control with the approval of the Chief Operating officer shall determine a normal statement dispatch cycle based on prevailing regulation, industry practice and customer demand.
- 2.4** Statements of accounts of corporate customers shall be addressed to the company and not to any individual unless there is an instruction to that effect from the company
- 2.5** Customers' statements shall not be addressed in care of the Bank officials or employees and any such requests from the client shall be diplomatically turned down
- 2.6** Rendition of any statement of account other than normal dispatch cycle shall be approved by the BSM and at a fee charged to the customer's account in line with Bank's Tariff. Such fee must be communicated to the customer.

## **SECTION VIII: ACCOUNT CLOSURE.**

### **1.0 INTRODUCTION**

This session deals with the guidelines to be followed for accounts closure in any of the branches of the Bank.

### **2.0 POLICY STATEMENTS**

- 2.1 An account shall be closed either at the instance of the customer or the Bank.
- 2.2 Closure of account at the instance of the customer must be in writing and processed according to the provisions of this policy.
- 2.3 Where a customer's request to close his account did not come through the Relationship Officer, the Relationship Officer shall be informed. He shall be required to hold discussions with the customer with the aim of convincing the customer to continue the relationship.
- 2.4 Where the closure is at the instance of the Bank, a written instruction or approval by the Chief Internal Auditor/ Group Head, Internal Control & Compliance / Chief Compliance Officer, Group Head, Banking Services, Chief Operating officer or Business EDs must be in place. This is subject to review as the Bank's business grows.
- 2.5 Upon the decision to close an account by the Bank, notice must be given to the customer. Such notice shall not be less than 21 days except for fraudulent accounts, while an advice must be given to the customer in writing after the account is closed
- 2.6 Customer files/documentation in respect of closed accounts shall be marked "**Closed**" and filed in account closure cabinet accordingly

## **SECTION IX: ACCOUNT TRANSFER/REPLICATION**

### **1.0 INTRODUCTION**

This section deals with the guidelines for the movement of accounts from one Branch to another.

Account transfer is the process of relocating an account from one Branch to another, which can be at the instance of the customer or the Bank.

### **2.0 POLICY STATEMENTS**

- 2.1 All requests for account transfer shall be treated as a change in branch domiciliation on the Core Banking Application.
- 2.2 All such requests must be approved by the Regional Head, Business. If it is an inter-regional account transfer, the two Regional Heads must approve.
- 2.3 The Bank may transfer a customer's account from one branch to another for the purpose of effective relationship management, consolidation of relationship or by Management directive.
- 2.4 Account transfer shall be done in accordance with the written instruction of the customer.
- 2.5 Where customer's account is transferred at the instance of the Bank, the customer shall be duly notified.

- 2.6 Photocopies of the relevant account opening documents shall be retained at the sending branch while the original shall be sent to the branch where the account is being transferred to. Customer Information Update and document verification must be carried out.

## **SECTION X: DORMANT ACCOUNTS**

### **1.0 INTRODUCTION**

This section guides the operations and management of dormant accounts in the Bank.

### **2.0 POLICY STATEMENTS**

- 2.1 Current and Savings accounts shall be classified as dormant once activities cease on them for a period of twelve and eighteen months respectively or as may be specified by the Bank from time to time.
- 2.2 Dormant accounts shall be allowed to receive credit deposit/inflow, but no debit transaction shall be allowed until the account has been reactivated.
- 2.3 Operations on dormant accounts shall be restricted unless the accounts are reactivated according to the provisions of this policy.
- 2.4 Reactivation of dormant account shall be carried out by the Branch in line with the approved process. Where the customer goes to a branch other than the account domiciled branch to reactivate a dormant account, the BVN of the customer must be verified and all required documents must be provided by the customer.
- 2.5 For reactivation of account, the CBN policy on three-tier KYC for customers shall apply.

### **3.0 DOCUMENTATION**

#### **3.1 For Tier 1 and 2 Accounts**

- i. Reactivation form with customer's signature duly verified.

#### **3.2 For Tier 3 Accounts**

- i. Reactivation form with customer's signature duly verified.
- ii. ID card of Signatories if existing ID has expired.
- iii. Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc) or Premises Visitation Report (PVR) will be required if customer's address has changed and PVR must be done on any account with balance above N50,000

#### **3.3 For Corporate**

- i. Reactivation request letter on company's letter head paper
- ii. Board Resolution authorizing the reactivation
- iii. ID card of Signatories if the signatories have changed or ID card is expired
- iv. Duly completed Customer Information Update form for new signatories
- v. If the search report is more than 5 years old, a new search must be conducted at the CAC.

- 3.4 Board Resolution, Proof of Address (Utility Bill, Rent Receipt, Tenancy Agreement, Voter's Card etc) or Premise Visitation Report (PVR) will be required for Tier 3 accounts if customer's address has changed and PVR must be

done on any account with balance above N100,000

- 3.5** For individual current accounts, the information on our account re-activation form is sufficient once the authorization is in accordance with existing mandate.
- 3.6** For sole proprietorship accounts with the owner of the account as the sole signatory, signing of the account re-activation form shall be in accordance with existing mandate.
- 3.7** For sole proprietorship accounts with additional signatory (ies) other than the owner of the business, there shall be an introductory letter signed by the business owner on the company's letter head paper.
- 3.8** For all limited liability accounts, there shall be a Board Resolution and a letter on the company's letter head paper authorizing the reactivation. And where the mandate has changed, this should be clearly stated in the board resolution.
- 3.9** In any of the above situation, the CSO must ensure that all outstanding documentation (if any) is regularized at the point of re-activating the account. Otherwise, the account will not be reactivated.

## **SECTION XI: POST-NO-DEBIT (PND)/BLOCKED ACCOUNTS**

### **1.0 INTRODUCTION**

This section deals with circumstances when restrictions are placed on accounts (e.g PND, Freeze, block etc). An account is said to have been restricted when no further transactions are allowed on it or specific transactions are prohibited.

The essence of placing restriction or blocking an account is to preserve the position of an account as at a particular date. If an account is in debit, further debits should not be allowed on the account as further debits will create 'unsecured advances' while credit lodgments extinguishes the existing debits.

### **2.0 POLICY STATEMENTS**

- 2.1.** The Bank shall comply with all regulatory and legal orders to PND, block, freeze or restrict access to any account.
- 2.2.** No transaction shall be allowed on any account with restrictions until such restrictions are vacated by a competent authority.
- 2.3.** PND placed on any account cannot BE REMOVED without the approval of the GH Banking services
- 2.4.** The occurrence of any of the following events automatically revokes the customer's mandate and the account is 'Restricted' or 'Blocked'.
  - i. Death of a customer
  - ii. Mental disorder of a customer

- iii. On receiving proof of mental disorder or death of a guarantor to a PREMIUM BANK customer.
- iv. On expiration of notice by a guarantor of his intention to terminate his guarantee.
- v. On a company passing a resolution to go into voluntary liquidation or on notice of such liquidation.
- vi. On notice of a receiving order in case of a bankruptcy proceedings or legal assignments.
- vii. Court order.
- viii. On receiving a further charge over any security held by the Bank e.g. Legal Mortgage
- ix. Where the Bank receives information on in-fighting amongst the signatories.
- x. Information on fraud related cases being perpetrated on the account.

- 2.5.** Assigned Accounts (with funds pledged as security) shall be identified and treated separately. With the concurrence of the depositor of funds, a specific amount in the account shall be hypothecated while the customer can still have access to the rest or the amount pledged should be transferred to a designated suspense account with adequate narration. Any release of "Assigned" accounts will be made in accordance with the Bank's Credit Policy.

### **3.0 OTHER MATTERS**

#### **2.1 Orders emanating from Legal/Regulatory Authority**

2.1.1 The BSM shall forward all account restriction orders to the Legal Department/Group Head, Internal Control & Compliance/Chief Compliance Officer and Group Head, Banking Services for professional advice.

2.1.2 Legal Department shall verify and confirm such orders and advise Compliance Group.

2.1.3 Internal Audit Group shall ensure that such orders are carried out in line with the advice of the Legal Department.

**2.2 Orders emanating from the Bank's Management-** The BSM shall ensure that the orders are enforced on the customer's account.

**2.3** Group Head, Banking Services shall be notified of all directives to rule- off/block or unblock/ unfreeze any account.

## **SECTION XII: PHYSICALLY CHALLENGED PERSONS/SPECIAL NEEDS**

### **1.0 INTRODUCTION**

This section provides guidance on rendering Banking Services to customers that are physically challenged.

### **2.0 POLICY STATEMENTS**

- 2.1** Premium Trust Bank recognizes and respects the fundamental Human Rights of all citizens as it affects their freedom of movement and association which includes access to banking services. The Bank shall align with these basic needs by providing convenient and innovative banking services to her customers and at the same time be accessible to all Stakeholders including the Physically Challenged individuals.
- 2.2** For the operation of this policy the following are classified as physically challenged:
- 2.2.1.1** The blind.
  - 2.2.1.2** The crippled- persons with legs or hands deformity which affects their capacity to function without making use of walking aids.
  - 2.2.1.3** Pregnant women
- 2.3** The provision of this section does not however cover:
- Those who, on account of physical body sickness, are unable to transact business on their own.
  - People that are mentally sick such that their presence in the Bank location could constitute a safety risk to the Bank and other customers.
- 2.4** The provisions of this section shall be implemented without compromising the security measures established for the safety of the Bank's personnel and assets or endanger the safety of other customers in our various business locations.
- 2.5** Where possible and feasible, the construction of a branch and offices shall be done to make for ease of access to the physically challenged individuals to transact business without attracting undue attention of staff and other customers.
- 2.6** The security guards shall be trained to understand the plight of the physically challenged and the importance of respecting their right to use the Bank's facilities. The support to be offered shall not be done out of pity but as a matter of duty.
- 2.7** **All physically challenged customers shall be referred to as "Special Customers" and preferably be called by their names.**
- 2.8** Where possible, items to aid easy commuting within and around the premises shall be provided by the Bank (e.g. ramp and rail).
- 2.9** **Banking Services for Physically Challenged Customers**
- 2.9.1** Where a customer is physically challenged and as a result could not appear in person in the Banking Hall to transact on an account, the customer must introduce in writing a representative to the Bank who will be carrying out his banking transactions.
  - 2.9.2** Such introduction shall be through duly notarized Power of Attorney.
  - 2.9.3** All payments made to the accredited representative must be Regis coped.
  - 2.9.4** Where a physically challenged customer can still appear in person in the Banking Hall, but cannot sign an appropriate and regular signature, all policies applicable to non-literate customers as stated in this policy document shall apply.

## **2.10 Blind Customers:**

- 2.10.1 In addition to the normal account opening documentation, customer shall introduce in writing at the point of account opening, a Guide whose details shall also be captured as part of account opening information.
- 2.10.2 Mandate on such account shall be by thumbprint or signature, which shall be clearly defined.
- 2.10.3 Where the mandate is given by signature, the specimen signature shall be attested by a witness who must be the Guide already introduced to the Bank
- 2.10.4 Where inconsistency in the signature of the blind customer is noticed, his thumb impression and BVN verification shall be obtained in addition to the signature.
- 2.10.5 For Savings accounts, the customer and the Guide shall be physically present for all withdrawal transactions on the account. A memo "Special Customer: to be accompanied by the Guide" shall be placed on the account.
- 2.10.6 Where the customer operates a current account, a memo "Special Customer: all cheques issued to be confirmed before payment" shall be placed on the account.
- 2.10.7 Electronic Banking products shall not be made available for this category of customers. Where the customer insists, such request shall be referred to Group Head, Banking Services and Group Head, Internal Control & Compliance for further consideration.

## **SECTION XIII: DECEASED CUSTOMER**

### **1.0 INTRODUCTION**

This section deals with the policy to be adopted upon notification of the death of any customer.

### **2.0 POLICY STATEMENTS**

- 2.1 Upon receipt of a notice of the death of an account holder, "DECEASED" shall be marked on the customer's file and in all other records. The time of the receipt of the notice must be marked also in the customer's file. Announcements in the Newspapers, Radio, Television or deceased employers or relatives shall serve as notification.
- 2.2 On receipt of information on the death of a customer, all accounts of such deceased customer shall be immediately blocked until all necessary documentations and procedures as stated in this policy are met.
- 2.3 Where there is more than one signatory to an account (joint account), all activities on the account shall be suspended on receipt of the notice of death of one of the



signatories.

**2.4** Where a customer dies testate [leaving a will] the following documentation shall be required:

2.4.1 The Executors of the Will shall be advised to take the Will to the relevant State High Court for Grant of Probate. Thereafter, they are required to produce the original Will and Grant of Probate issued by the High Court to the branch for sighting.

2.4.2 If the Probate was granted by the High Court of a State other than the State where the deceased's customer's account is domiciled, the Executors shall be advised to have the Probate resealed at the High Court of the State where the account is domiciled.

**2.5** Where a customer dies intestate [i.e. without leaving a Will] and the balance in the deceased's account[s] is less than N250, 000.00 (Two Hundred and fifty Thousand Naira Only) or its equivalent.

2.5.1 The next-of-kin [as named in the account opening documentations] shall depose to an affidavit stating that he is the next-of-kin and that the deceased died intestate.

2.5.2 The next-of-kin shall execute the Standard indemnity for payment of balance out of deceased customer's account without Letter of Administration.

**2.6** Where a customer dies intestate [i.e. without leaving a Will] and the balance in the account is more than N250,000 (Two Hundred & fifty Thousand Naira Only) or its equivalent:

2.6.1 The customer's next-of-kin shall be advised to obtain Letter of Administration from the State High Court for administration of the deceased customer's estate including his bank accounts.

2.6.2 If the Letter of Administration was granted by the High Court of a State other than the State where the account is domiciled, the Administrator[s] shall be advised to have the letter of Administration resealed at the High Court of the State where the account is domiciled.

2.6.3 Upon receipt of the Letter of Administration, copies shall be sent to Legal Department for confirmation/search at a fee.

**2.7 Joint Accounts/Partnership: In case of deceased customer,** the following shall apply on an account with joint signatories:

- 2.7.1 Receive and record the notice of the death of one of the joint holders of the account in the customers' file marking DECEASED against the name of that account holder. A death certificate will be required.
- 2.7.2 Statement of account should be sent to the survivor(s) as at the date of notification of death.
- 2.7.3 All cheques signed by the deceased must be marked "Drawer Deceased" and returned or paid if all survivors authorize. In the case of partnership, the death of a partner terminates all mandate
- 2.7.4 If the joint account is in debit, all further transactions on the account should be stopped. The Relationship Manager should explore means of recovering any amount owed.
- 2.7.5 The survivor(s) should be invited to explore means of settlement of any unpaid loan/advance. Obtain assurance as to whether recourse should be made to the estate of the deceased unless the survivors assure in writing to take over.
- 2.7.6 If the joint account has a credit balance at the notification of the death of one of the joint holders and if there is more than one survivor, remove the documents in the mandate file for the account except the account opening form. Issue a new specimen signature cards to the survivors.
- 2.7.7 In every event, Legal Department advice must be sought for all actions taken with respect to operation of such accounts.

**2.8 Company Accounts:** In case of death of a signatory to a company account, the following shall apply:

- 2.8.1 Where the deceased is a signatory to the account, the company will simply pass a resolution appointing a new signatory (ies).
- 2.8.2 Thereafter the mandate form is changed to reflect the new signatory (ies) in addition to all other applicable account opening procedures being adhered to.

**2.9 Associations, Committees, Societies Accounts**

- 2.9.1 The death of or vacation of office by authorized signatory renders the account legally inoperative.
- 2.9.2 Such account shall be placed on Post No-Debit status upon receipt of notice of the event.
- 2.9.3 The account remains inoperative until the Bank receives duly authenticated copy of the resolution appointing authorized signatory (ies). Mandate cards must be duly updated thereafter.

**2.10 Garnishee Proceedings on Accounts:** This is an account against which a court order has been issued, permitting disbursement on the account only with written consent of the court

2.10.1 BSMs shall maintain Special file containing copies of all relevant Court orders or similar documents with the original being forwarded to Legal Department and Inspection.

2.10.2 The Branch shall place a "hold funds" up to the garnishee sum on the balance in the affected customer's account for garnishee Nisi. Where the fund in the account is not adequate to cover the garnishee amount, a Post-No-Debit shall be placed on the account. A memo should be placed on the account stating the department and reason for the hold funds or PND.

2.10.3 Where a Garnishee order becomes absolute, the amount in the customer's account as at when the order was received shall be transferred to an appropriate GL until further instruction is received from Legal Department.

2.10.4 Accounts upon which a freeze order of court [attachment notice e.g. Mareva] has been served shall be properly identified and marked on the Core Banking Application as a blocked account

2.10.5 Any movement on these accounts shall require prior approval of the officer that gave the block order or in the case of a Court of Law, the Chief Internal Auditor and Head, Legal Department

### **3.0 OTHER MATTERS**

3.1 **Mental Disorder:** This is a person that has been medically certified to be insane and is considered not to be of a sound mind.

3.2 On receipt of a notice of mental disorder of a customer of the Bank, the BSM shall immediately put the account on "Post No Debit" status and contact the Group Head, Banking Services / Group Head, Internal Control & Compliance for further directives. Generally, the account shall be administered on behalf of such customer by his/her next of kin. The person to operate the account on behalf of the mentally challenged customer should approach the High Court for an order (ex-parte) appointing him/her as a next of kin to the customer. This order should be submitted to the Bank and be subject to confirmation of its authenticity.

## **SECTION XIV: STOP PAYMENT ORDERS**

### **1.0 INTRODUCTION**

This section covers the handling of stop payment orders received on cheques and other financial instruments drawn on branches / customers' accounts.

### **2.0 POLICY STATEMENTS**

2.1 Customer stop payment instructions shall be accepted in writing, by telephone, or by electronic means subject to the provisions of this policy.

2.2 Stop payment orders must be held active for at least 6 months.

**Cancellation notices may be accepted by the same means of communication as original stop payment instructions and shall be subjected to the same processing requirements.**

- 2.3** Accounts for which cheque books are reported as lost or stolen shall be handled as stop payments. Instructions received to place stop payments on undated cheques shall remain open on all records on permanent basis
- 2.4** Stop payment instruction received shall be time-stamped and maintained on the system immediately.
- 2.5** Customers shall be advised promptly if an instrument has been paid prior to receipt of stop payment instruction. The Bank shall not take any responsibility for any such stop-payment request received after the cheque has been paid
- 2.6** Where instructions are accepted by telephone, the customer shall be advised that such instructions are accepted subject to the item not having been paid, and further subject to his written confirmation being received within 24 hours
- 2.7** Stop payment charges shall be in line with the Bank's approved Banking fees and charges at every point in time.
- 2.8** All instruction to cancel a stop payment order earlier received must be in writing.

of FI accounts in their branches.

## **CHAPTER 4: CHEQUE BOOK ISSUANCE**

### **SECTION I: GENERAL INTRODUCTION**

As a rule of banking practice, the Bank shall exercise strict control over its security documents due to financial and reputational implications they portend for the Bank if the documents fall into the hands of unauthorized persons.

The Cheque Book Services Unit is charged with the responsibility to handle all matters concerning the printing and delivery of the customers' cheque books, Managers cheques, dispatch of cheques and any other task as maybe approved by the Bank.

### **SECTION II: CHEQUE SERVICES POLICY**

#### **1.0 INTRODUCTION:**

This section contains statements that guide the operations of Cheque services in the Bank.

#### **2.0 POLICY STATEMENT**

- 2.1** Cheque Services Unit shall take full responsibility for production, management, and safety of security instruments (Cheques books) until they are delivered to customers.
- 2.2** All cheque books and Managers cheque requests from branches shall be processed at the CSU Central office.
- 2.3** CSU unit shall ensure that all cheque book requests logged on the CBA before the cut-off time from branches are treated within 24 hours.
- 2.4** CSU unit shall transmit encrypted Cheque request file to Cheque Printing vendor through the secure Server via approved channel.
- 2.5** CSU unit shall ensure delivery of all printed cheque books within 24 hours for Lagos branches and 48-72 hours for upcountry branches. CSU unit shall ensure cheque books are delivered in shrink-wraps and in secured cartons by the vendor.
- 2.6** Access to CSU room shall be restricted. Only staff of the Unit and authorized persons shall have access to the CSU room. Cleaners, service engineers and other technicians on maintenance service duties shall be closely monitored and supervised when in the room by the Head of the Centre.
- 2.7** A movement register shall be put in place to capture the activities of Technicians, Vendors and Contractors in the CSU Unit.

#### **3.0 OTHER MATTERS**

- 3.1** A register shall be kept at CSU Office and the branch to document release and receipt of Cheque books and Cards and movement of dispatch riders/designated officers on pick up assignment.

- 3.2** Processed cheque books awaiting dispatch shall be accounted for and securely always kept in fireproof cabinets under dual control.
- 3.3** Damaged cheque leaves shall be documented in the damage cheques register and shall be perforated and kept in safe custody.
- 3.4** The stock of mutilated printed cheques shall be destroyed every year in line with the approved process which includes the recommendation from Head, CSU and approval from the GH, Banking services
- 3.5** CSU shall receive quality assurance certificate of cheques produced from the cheque printing vendor every end of month and periodically evaluate the quality of cheques printed by the vendor.
- 3.6** Head, CSU with Internal Control Officer shall visit vendor factory at least twice a year to review operations of vendor and ensure work undertaken is performed in accordance with agreement in service level agreement document.
- 3.7** The Head CSU shall ensure that the Cheque Book stock GL account is proofed monthly.

### **SECTION III: CHEQUE BOOKS ISSUANCE**

#### **1.0 INTRODUCTION**

This section deals with the issuance of cheque books for the operation of all forms of accounts that require the use of dedicated (customized) payment instruments in the Bank.

#### **2.0 POLICY STATEMENTS**

- 2.1** Cheque books for newly opened accounts shall be issued only on accounts with complete documentation.
- 2.2** Customer cheque books shall be printed on high quality safety paper with security features imposed on the cheques in accordance with regulatory requirements.
- 2.3** All cheques shall be pre-numbered with cheque and control numbers and bear the customer's unique account identification (e.g. account number and name, title etc).
- 2.4** All printed cheque range shall be maintained on the Core Banking Application before issuance to the customer.

## **CHAPTER 5: CASH OPERATIONS**

### **SECTION I: GENERAL INTRODUCTION**

This chapter deals with the following areas of the Bank's operations:

- i. Vault Administration
- ii. Cash and Teller
- iii. Foreign Monies
- iv. Safe Deposit
- v. Cash Insurance
- vi. Cash Management
- vii. Others

### **SECTION II: VAULT ADMINISTRATION**

#### **1.0 INTRODUCTION**

This section covers the general guidelines and requirements for the establishment of Vaults, Bankers' Treasury Safes (BTS) and Vault compartments in the Bank. It also deals with issues such as control requirements and respective custodians' designation amongst others.

#### **2.0 POLICY STATEMENTS**

- 2.1** Every branch of PremiumTrust Bank shall have vault compartments equipped with restrictive devices where cash and other valuables shall be kept.
- 2.2** All vaults in branches and Cash Centers shall be equipped with BTS (Bankers Treasury Safe) which shall be under dual control in the form of separate combination and key locking system.
- 2.3** Vault combination and keys shall be kept by designated officers of the Bank as advised by Group Head, Banking Services and Group Head, Compliance & Control in line with the policy of Vault/BTS key handling.
- 2.4** There shall be adequate insurance cover for all cash and valuables kept in the Vault.
- 2.5 Vault Opening:**
  - 2.5.1** The Vault shall not be opened earlier than 7.30am on a working day and locked up not later than 6.00pm daily exception to this shall require the approval of the GH, Banking Services
  - 2.5.2** The Cash Officer and the BSM shall carry out necessary security checks in and around the premises before opening the vault
  - 2.5.3** All adjoining doors shall be locked before opening the Vault door.
  - 2.5.4** All the custodians shall witness the opening of the Vault in the morning and sign the Vault Movement Register.

- 2.5.5 All persons entering the Vault at any point in time must sign the Vault Movement Register.
- 2.5.6 The Cash Officer shall vault out cash, till boxes and other work tools.
- 2.5.7 When not in use, the Vault door must be locked under the dual control of the two designated Officers.

## **2.6 Vault Key Exchange**

- 2.6.1 A register for vault keys shall be maintained to document keys/combination exchange/movements. Where there are changes in the status of any of the custodians of the combinations [i.e. redeployment/resignation] a request to reset combination shall be made to Group Head, Internal Control & Compliance.
- 2.6.2 Vault keys/combination details are not transferable. Any transfer of vault keys/combination shall be in line with the Key Exchange Procedure outlined above. On no account shall BSM transfer his/her key to Cash Officer and vice-versa.
- 2.6.3 All changes in the status of custodianship (disengagement, inter- branch transfer, promotions, assignment to other duties within the branch, etc.) shall require the immediate changing of combinations and the surrendering of keys if the change in the status will bring about compromise. All combinations shall be changed at least once a year.

## **2.7 Vault Structure, Maintenance and Repairs**

- 2.7.1 All vaults in the Bank must be built with reinforced concrete.
- 2.7.2 No combustible or inflammable item shall be kept in the Vault.
- 2.7.3 No switch, socket and electrical wiring shall be allowed in the Vault.

## **2.8 Others**

- 2.8.1 Vaults shall be equipped with keys and combinations and must be opened under dual control.
- 2.8.2 There shall be full complement of security personnel before opening of vault.
- 2.8.3 All cash must be kept in the BTS and not on bare floor in the vault
- 2.8.4 Unauthorized entry into the Vault shall not be allowed

## **3.0 VAULT REGISTERS**

- 3.1 There shall be registers maintained in every vault to capture the items in the Vault. These registers include:
  - 3.1.1 Vault Cash Movement Registers (for each currency);
  - 3.1.2 Subject to Count/ Late Cash Register
  - 3.1.3 Cash Summary Register
  - 3.1.4 Vault Persons Movement Register.
  - 3.1.5 There shall also be a register to capture the exchange of Vault/BTS keys and combinations in a branch.



#### **4.0 VAULT SECURITY ADMINISTRATION**

- 4.1 Key Custodian/Backup:** The following shall be the designated officers for custody of the Bank's vault keys/combinations:
- 4.1.1 Combination Lock – BSM (Primary Custodian)/Transaction officer as Backup. Deviation from this shall require the approval of the Group Head, Branch Service and Group Head, Compliance & Control.
  - 4.1.2 Main Vault key, Upper Grill Key and BTS key – BSM (Primary Custodian)/Transaction Officer (Back up).
  - 4.1.3 Lower Grill Key – Cash Officer (Primary Custodian) Customer Service (Back up)
  - 4.1.4 The duplicate keys shall be in the custody of the Group Head, Internal Control & Compliance & Compliance
  - 4.1.5 Under no condition shall any of the keys or combination be held by a non-designated staff.
  - 4.1.6 The Vault keys must never be left (or hidden) in the branch overnight. The key must be always retained by the Key holders
- 4.2** The Internal Control Officer shall ensure that vault operations are carried out in accordance with this policy document.
- 4.3** Corporate Services in conjunction with Internal Control shall arrange regular preventive maintenance of all vault doors/BTS at least twice a year using duly authorized vendors.
- 4.4** Each key holder to the Vault/safe shall both be individually and jointly responsible for the contents of the Vault/safe.
- 4.5** Without prejudice to any of the above provisions, the primary custody of the Vault shall be the responsibility of the BSM of the branch.

#### **5.0 OTHER MATTERS**

##### **5.1 Cash Insurance**

- 5.1.1 Banking Services Group shall advise branches of their vault insurance limits. It is the responsibility of BSMs and Cash Officers to ensure efficient management of cash holding and ensure the advised vault limit is always adhered to.
- 5.1.2 Where it is becoming impracticable for a branch to maintain the advised limit, the BSM/Cash Officer shall be required in such situation to make placement for overnight insurance cover. Request shall be made online to Banking Services dept not later than 4.45 p.m. or any other time as may be specified by Insurance desk.

- 5.1.3 While considering the amount to be booked for overnight insurance, the BSM/Cash Officer shall take into consideration Late Cash, Subject to Count (STC), Boxed Cash, etc.
- 5.1.4 A register shall be maintained at the branch to document all overnight insurance placements for audit trail purposes. The Register shall indicate the date of placement; branch closing cash figure (both local and FX currency translated to Naira at advised exchange rate).
- 5.1.5 Where a branch consistently exceeds its vault limit as a result of business expansion/activities not due to seasonal fluctuation, the BSM in conjunction with the BDM shall write the Group Head, Banking Services with justification for increase in the Vault limit backed with report of analysis of trend in the last 3 months.
- 5.1.6 Cash movements in/out of the Vault must be strictly supervised and transported in locked boxes as provided by the Bank from time to time.
- 5.1.7 The Bank cash operation shall be regarded closed only after the cash item for the day has been kept into the Vault of the Bank, all cash related vouchers are posted, and cash books balanced.

### **SECTION III: CASH AND TELLER**

#### **1.0 INTRODUCTION**

This section deals with cash handling in the Bank which must be observed in all business locations.

#### **2.0 POLICY STATEMENTS**

- 2.1 All handling of cash and valuables other than working supplies shall be under dual custody and performed within the designated areas.
- 2.2 Where cash and valuables are held in single custody, these shall be verified daily by the Cash Officer or authorized checker.
- 2.3 All front desk Tellers except for Bulk Tellers shall have universal functions i.e. payment and receipt of cash as well as acceptance of cheque lodgments, Account opening and fund transfer.
- 2.4 All staff are prohibited from receiving/making phone calls while attending to customers, they are also not allowed to use EarPods and other gadgets while attending to customers.
- 2.5 Tellers shall maintain Till Registers which shall capture the details of their daily till balances.

#### **3.0 OTHER MATTERS**

- 3.1 Each Teller shall be responsible for balancing the transactions processed daily.
- 3.2 The Cash Officer shall have the primary responsibility for the operations of the Cash and Teller Unit.

- 3.3 The Cash Officer shall on daily basis review the activities of the cash area and sign off on the Tellers' Register.
- 3.4 The BSM shall on daily basis review the activities of the cash area and sign off on the Vault Cash Register.
- 3.5 The INTERNAL CONTROL OFFICER shall as part of regular reviews, review the activities in the cash area and sign off on the Teller's till registers.
- 3.6 All cash payments and receipts by Tellers shall be posted into the Banking application being used at any point in time.
- 3.7 **Teller's Pay-out Limit:** Suitable Teller's maximum cash pay-out limit shall be established by the Group Head, Banking Services and approved by the Chief Operating officer, this applies to cash paid out by an individual Teller on any one transaction. Payments above limits shall require the authorization of the supervisor.
- 3.8 The amount of cash outside the Vault must not exceed the insured counter limit of the Branch.
- 3.9 **Cash Exchange:** Cash exchange between Tellers is not allowed. All cash must be vaulted to the Cash Officer with proper documentation.
- 3.10 **Teller's Till Box Limit:** All Tellers' tills shall be sold to the vault at the close of business every day.
- 3.11 The cash area shall be "**out of Bounds**" to non-cash operations staff. Any front-line officer (including Tellers and cash operation staff) shall not be allowed to take their mobile phones, bags, cash or other personal effects to the cash area.

## SECTION IV: CASH DEPOSITS

### 1.0 INTRODUCTION

This section provides guidelines for handling cash deposits into various accounts by customers.

### 2.0 POLICY STATEMENTS

- 2.1 The Bank shall receive cash deposits from customers within the official business hours and such shall be posted as soon as they are confirmed. Any cash received after the end of business hours shall be treated as late cash to be posted the next working day.
- 2.2 Cash received as deposit shall be counted, verified under Ultra-Violet light and the deposit slip time stamped with the Teller's validating stamp.

- 2.3** Where a physical deposit slip is used, the Teller shall not complete the deposit slip on behalf of the customer. A non-literate customer shall be directed to the Customer Service Unit for necessary assistance.
- 2.4** Teller receipt printers must be used in treating deposits.
- 2.5** All large deposit by customers shall be classified as Bulk Cash and would therefore be referred to the bulk-counting room. Bulk Tellers shall have the primary responsibility for counting all such cash in the presence of the depositors.
- 2.6** Tellers shall count cash in the presence of the customer/depositor and ensure that any difference thereon is immediately resolved with the customer after which the deposit slip shall be stamped, and the deposit details recorded in the Teller deposit register.
- 2.7** Under no circumstance shall Tellers share or exchange personalized stamps.
- 2.8** All cash to be vaulted in shall be appropriately strapped by the Tellers.
- 2.9** **Late Cash Deposit:** Late Cash Register shall be maintained to have columns for date received, customer's name, account number, amount, name of depositor, signature of receiving Teller, date processed/counted and signature of the Teller that counted it.
- 2.10** All copies of the Deposit Slip shall be affixed with a stamp carrying the inscription "Late Cash Deposit" and a copy given to the customer.
- 2.11** **Subject To Count (STC)**
- 2.11.1 Relationship Officers shall identify customers that require this facility and send the STC agreement form to them for execution.
- 2.11.2 The agreement shall be signed in accordance with the customer's mandate with the Bank and the signature thereon must be verified. A file shall be maintained for the executed forms.
- 2.11.3 Branches shall also maintain a register that must list daily, the details and breakdown of all cash received as STC at the close of the day's business. The register shall capture the following details: Date, Amount, Account Name, Account Number, Name of Depositor, Signature of Depositor, Signature of Receiver and Time of Receipt.

- 2.11.4 All copies of the Deposit Slip shall be affixed with a stamp carrying the inscription "Subject to Count" and a copy given to the customer.
- 2.11.5 Under no circumstance shall any Branch receive cash as STC from persons other than the Account Holders, Authorized Signatories, or their officially introduced representatives.
- 2.11.6 All cash received as STC shall be counted the next working day.
- 2.11.7 All STCs in the Vault shall be confirmed as part of vault cash count activities at opening and closure by the Vault custodians to reconfirm their completeness status.
- 2.11.8 STC cash shall be counted in the presence of the depositor/customer or his agent.

## **2.12 Boxed Cash**

- 2.12.1 Boxed cash deposit Register shall be maintained at each business location. It shall be the responsibility of the Cash Officer to ensure that this register is properly maintained.
- 2.12.2 Boxed cash shall be bundle-counted, and all copies of the Deposit Slip shall have 'Boxed Cash' boldly written on it and a copy given to the customer.
- 2.12.3 Under no circumstance shall boxed cash be returned in part or whole to any customer without posting into the customer's account.
- 2.12.4 Boxed cash shall be kept in the Vault in a lockable box overnight. The box shall be locked, and the keys should be handed over to the customer, who would be required to return the next day with the key so that the box can be opened for the cash to be counted.
- 2.12.5 Boxed cash transactions shall not be concluded without the approval of the Cash Officer or BSM.
- 2.12.6 Boxed cash must be processed latest by the next working day after the deposit was made.

## **3.0 OTHER MATTERS**

- 3.1. The Cash Officer shall ensure that all cash vaulted in by Tellers are verified, accounted for, and necessary entries passed.
- 3.2. The Cash Officer shall ensure effective monitoring of the Tellers to guard against incidence of cash deposit suppression

- 3.3. The Cash Officer shall carry out Spot checks on Tellers to ensure all cash in Teller's possession are supported with appropriate record in the Cash Deposit Register.
- 3.4. The BSM and the Cash Officer shall check the details of entries in the Late Cash Deposit Register and sign off on the Register. No cash deposit shall be treated as late cash without approval of the BSM. The BSM/Cash Officer shall sign off on the deposit slips to be treated as late cash.
- 3.5. **Movement of Excess Cash:** If at any time during the day Teller's holding of cash is more than the insured floor limit, the Cash Officer shall ensure that such excess cash is transferred to the Vault.
- 3.6. **Late Cash Deposit:** Late cash is cash deposited by a customer or his representative and counted by Tellers but not posted same day. Late cash deposits must be posted the next working day after the deposit was made.
- 3.7. Direct withdrawal of STC or Late Deposit Cash shall not be allowed unless the lodgments is routed through the designated account before withdrawal.
- 3.8. Tellers are not allowed to assist customers to prepare or alter deposit slips. Deposit slips with errors and/or un-authenticated alterations shall be returned to customers for correction or endorsement.
- 3.9. All deposits into Sundry Accounts must be approved by the BSM. Withdrawal is not allowed on deposits made into Sundry Accounts.

## **SECTION V: CASH PAYMENTS**

### **1.0 INTRODUCTION**

This policy guides the operations of cash payments. This entails the use of various banking instruments for cash payments depending on the nature of transaction involved.

### **2.0 POLICY STATEMENTS**

- 2.1 Cash payments shall be made only on appropriate sign off by authorized persons as indicated in the Bank's policy.
- 2.2 Cash payments shall be made to the stated beneficiaries of the payment instrument.
- 2.3 All beneficiaries of payments made shall acknowledge receipt of payment(s) by signing off on the back of the instrument once
- 2.4 All third-party cheques above the bank's approved confirmation threshold (or where expressly specified by the customer's mandate) shall be confirmed before payment.
- 2.5 Confirmation of third-party cheques shall be duly obtained from the drawer in accordance with the confirmation process of the Bank.

- 2.6** Withdrawal shall not be allowed on an account with incomplete documentation except there is a deferral in place. Approval must be obtained in writing from the GH, Banking services Group or his/her designated representative.
- 2.7** Only the account holder shall make withdrawals on savings accounts without cheque book. Third party withdrawals on savings account shall be allowed with the use of a cheque book.
- 2.8** All payments made by the Teller shall be evidenced by processed tickets.
- 2.9** The Authorizer on the system shall also sign off on the payment instruments.
- 2.10 Operational Guidelines**  
(Tellers) shall:
- 2.10.1** Ensure proper identification of payee through his signature and image on the system. (I.e. where the payee is the account holder).
- 2.10.2** Where the payee is not the account holder, the Teller shall ensure proper identification of the beneficiary. The following are acceptable means of identification:
- i. Valid International passport.
  - ii. Valid Federal Republic of Nigeria Driver's License.
  - iii. Voter's Card
  - iv. National ID Card
  - v. BVN print out
  - vi. An account Holder with the Bank
  - vii. Other means that may be approved by Regulation from time to time or as specified by the account holder
- 2.10.3** Where the payee presents a foreign passport for identification, further confirmation shall be carried out by the Relationship Officer/BDM from the account holder. Such foreign passports must have a valid visa where applicable.
- 2.10.4** A payee can also be identified by an existing current account customer of the Bank. Customer's account details and signature shall be written at the back of the instrument, and this must be verified prior to payment.
- 2.10.5** Where the account holder is physically present at the Branch as at the time of the transaction, he can identify the payee. This must be in writing on the back of the instrument.
- 2.10.6** All the above means of Identification must be original and Valid.
- 2.10.7** Mandate on all payment instruments shall be verified and stamped by the Teller handling the instrument.
- 2.10.8** All cheques to be cashed by account holder or by a third party must be processed by the Teller and referred to the Cash Officer for approval if amount is above the Teller's limit before payment.
- 2.10.9** It is the duty of the paying Teller to ensure that third party cheques are

- processed in line with the policy.
- 2.10.10 The Teller shall carefully review the means of identification to ensure that it is not newly/freshly laminated or altered. New ID cards / International passports must be referred to the BSM for confirmation before payment.
  - 2.10.11 Where a customer presents a newly issued ID, the BSM may request for a copy of the old means of ID, even if it has expired in addition to the new ID.
  - 2.10.12 The Teller shall keep a hard or soft copy of the identification card.
  - 2.10.13 Where the Teller is put on enquiry, the customer shall be tactfully referred to the Cash Officer or the BSM.
  - 2.10.14 The Cash Officer shall be responsible for the effective and efficient operations of cash payments in the branch. He shall authorize payments above the approved limits of Tellers, but subject to the limit assigned to him by the BSM of the branch.

### **3.0 OTHER MATTERS**

- 3.1 Customers' accounts shall not be overdrawn without written approvals from the Chief Operating officer and the Chief Risk officer.
- 3.2 Cash shall only be paid after debiting the customer's account.
- 3.3 Tellers must watch out for flags/pop-up memos during posting of transactions.
- 3.4 Cash analysis of withdrawals must be done on the reverse side of the payment instruments and the customer must sign to acknowledge receipt of cash.
- 3.5 **Regiscope of Payee:** All third-party payments above the bank's approved threshold must be Regiscope.
- 3.6 **Cheque Swiping Machines** shall be provided in all branches and Tellers shall swipe all cheques through the machine before payments are made.

## **SECTION VI: FOREIGN MONIES AND CHEQUES**

### **1.0 INTRODUCTION**

This section deals with the receipt (deposit) and payments of foreign currencies by customers

### **2.0 POLICY STATEMENTS**

- 2.1 All transactions in foreign currency shall be conducted in the manner provided in the prevailing Exchange Control Laws at the time of the transaction.
- 2.2 The Bank shall accept foreign currency deposits into Domiciliary accounts and make payments from same and other inward foreign currency transfers.
- 2.3 A Teller shall be dedicated to handle foreign currency transactions. However, no foreign money shall be received without the knowledge of the Cash Officer.
- 2.4 The designated Foreign Currency Teller shall maintain nil balance daily. End of Day (EOD) foreign cash balance shall be sold to vault daily.



- 2.5** All foreign currency received and paid shall be verified by the Teller using the Foreign Currency Verifier.
- 2.6 Withdrawals on Domiciliary Account**
- 2.6.1** The customer shall initiate a written domiciliary withdrawal instruction/Forms/cheque. The signature is verified and a balance on the account taken to ensure that there is enough funds to cover the amount to be withdrawn and associated charges.
- 2.6.2** All third-party withdrawals on domiciliary accounts shall be through duly issued cheques or written instructions and processed in accordance with the Bank's policy on cheque payments.
- 2.6.3 Payments on Foreign Inward Transfers:** This includes payments made on Western Union Money Transfers and other foreign currency inward transfers. This shall be processed in accordance with the Bank's policy on WUMT and other MTO transfers.

## **SECTION VII: CASH DIFFERENCES**

### **1.0 INTRODUCTION**

This section deals with differences (shortages and overages) arising from daily cash operations.

### **2.0 POLICY STATEMENTS**

- 2.1** All cash shortfalls (Local and Foreign) considered irrecoverable by an operation staff during the normal course of transactions or excess cash that cannot be identified and refunded shall be treated as Shortage and Overage respectively.
- 2.2** Money found within the vicinity of the premises of the Bank shall be treated as an overage after every effort made to identify and refund the amount to the owner failed.
- 2.3** No cash shortage/overage shall be carried over from one financial year to another.
- 2.4** Differences that arise between accounting balances and detailed records in connection with periodic proofs or otherwise shall be investigated, properly resolved and appropriate entries passed, if necessary.
- 2.5** Cash differences traced shall be reversed from the GL where it was warehoused after getting approval from Group Head Banking Services.
- 2.6** Detailed records shall be maintained for individual officer or department with respect to unresolved cases of shortages and overages.
- 2.7** Any cash difference arising from an officer's daily transactions processing shall be reported to the BSM immediately. Where the difference remains unresolved after 24 hours the BSM is expected to report it to the Internal Control Officer
- 2.8** For differences that cannot be traced, approval shall be obtained from Group Head, Branch Branches to suspend the shortages/overages.

- 2.9** All differences (overage or shortage) shall be suspended into Account Receivable – Cash Shortage and Account Payable – Cash Overage GL accounts respectively pending determination of investigation and decision of Executive Management.
- 2.10** Differences that cannot be located and resolved within a financial year shall be written off on the recommendation of the GH, Banking and approvals of the Chief Operating Officer and MD/CEO.

### **3.0 OTHER MATTERS**

#### **3.1 Handling of Counterfeits and Forgeries**

- 3.1.1** All counterfeit notes must be reported to the BSM and the customer promptly notified. Such notes shall not be returned to the customers.
- 3.1.2** Where counterfeits are discovered in the cash already in the Vault and the source could not be identified, the total amount shall be declared and treated as a cash shortage.

## **SECTION VIII: CASH MANAGEMENT CENTRES**

### **1.0 INTRODUCTION**

This section defines the operational guidelines of the Cash Management Unit in relation to the supply of cash to and from branches, other business locations of the Bank and other Banks.

### **2.0 POLICY STATEMENTS**

Cash Management Unit shall be established in the various Regional Offices including Lagos. The Cash Management Centre Head Office shall be directly supervised by the Group Head Branch Branches.

- 2.1** Cash supply to all branches and business locations of PremiumTrust Bank shall be the sole responsibility of the Cash Management Centre (CMC).
- 2.2** Movement of cash and foreign monies originating from branches shall be handled by both the BSM and the Cash Officer. Movement of cash and foreign monies originating from Head Office shall be the responsibility of the Head, CMC.
- 2.3** Regional CMC Centre shall be adequately staffed and headed by an officer with minimum level of Banking Officer who shall report directly to the Head of CMC, Lagos with dotted reporting line to the Regional service manager for regions outside Lagos.
- 2.4** Security shall be provided for all cash movements according to the prevailing Police Authority requirement in the region. Minimum of 2 Policemen must be maintained for all cash movements.

- 2.5** No officer shall have access to the Head of Center keys and Cash Officer's keys at any time.
- 2.6** All Vault and cash registers shall be locked in the Vault overnight to avoid unauthorized access to vital/sensitive information (i.e. cash balances).
- 2.7 CMC Vault Management**
- 2.7.1 Every CMC Centre of Premium Trust Bank shall have vault and compartments equipped with restrictive devices where cash and other valuables shall be kept.
- 2.7.2 All vaults in every CMC Centre shall be equipped with Bankers Treasury Safe(s) which shall be under dual control in the form of separate combination and key locking systems.
- 2.7.3 Vault combination and keys shall be kept by designated officers of the Bank as advised by Group Head, Banking Services in line with the policy of handling Vault/Bankers Treasury Safes.
- 2.7.4 The Vault shall operate within a stipulated Insurance Limit.
- 2.8 VAULT STRUCTURE, MAINTENANCE AND REPAIRS**
- 2.8.1 All CMC vaults in the Bank shall:
- i. Be built with reinforced concrete.
  - ii. Not be fitted with combustible or inflammable material(s)
  - iii. Not be fitted with electrical switches, sockets and wiring.
- 2.9** Cash disbursed or evacuated from Branches shall be acknowledged on an Inter-Branch cash movement schedule.
- 2.10** Movement of cash between the CMC and branches shall be properly registered in the Inter-branch Cash Movement Schedule.
- 2.11 REGISTERS TO BE KEPT**
- 2.11.1 The following registers shall be maintained at every CMC Centre:
- i. Inter-branch Register
  - ii. Vault Cash Movement Registers
  - iii. FX disbursement/evacuation
  - iv. Cash from Vault To Process Centre register
  - v. Customer cash pick-up register
  - vi. Vault Persons Movement Records
  - vii. Subject To Count Register
  - viii. Daily Transactions Register
  - ix. Till Register
  - x. Vault Custodian Register
  - xi. Shortage/Overage Register
  - xii. Any other register as maybe prescribed.

- 2.12** Approval of the Group Head, Banking Services shall be obtained for all Inter-state and cash movements by Air.
- 2.13 Key Custodian/Backup:** The following shall be the designated officers for custody of the CMC vault keys/combinations in locations where CMC is within a branch :
- 2.13.1 All Combination Locks – BSM (Primary Custodian)/Cash Officer (Back up) of the branch where CMC is located.
  - 2.13.2 Main Vault key, Upper Key to the Grill Gate and BTS key – Head, CMC Centre (Primary Custodian).
  - 2.13.3 Lower Key to the Grill Gate – Cash Officer (CMC) (Primary Custodian)
- 2.14** The following shall be the designated officers for custody of the CMC Vault keys/combinations in locations where CMC is stand alone.
- 2.14.1 All Combination Locks and Upper key to the Grill Gate – Head, CMC Centre.
  - 2.14.2 The Main door, Lower key to the Grill Gate and BTS keys – Cash Officer (CMC)
- 2.15** In locations where there are other security doors, the upper key and lower keys shall be held by The Centre Head and Cash Officer (CMC) respectively
- 2.16** In locations where there is a partition in the Vault:
- i. BTS key – Head, CMC Centre (Primary Custodian)
  - ii. Entrance Door key - Cash Officer (CMC)
- 2.17 Custody of Duplicate Keys:** The duplicate keys shall be in the custody of the Group Head, Internal Control & Compliance or his designate.
- 2.18** Under no condition shall any of the keys or combination be held by a non-designated staff.
- 2.19** Key holders shall ensure that key is secure and within easy reach. The Vault keys shall not be kept (or hidden) in the Office overnight. The key shall be always in the custody of the Key holders.
- 2.20** The Cash in the Vault shall agree with the records contained in the respective registers and the relevant GLs. It shall be the responsibility of the Vault custodians and the INTERNAL CONTROL OFFICER to ensure this.
- 2.21** Any request for vault maintenance/repairs/changing of keys shall be initiated by the Head, CMC to the Head, (GIS) Department, through the Group Head, Banking Services
- 2.22** Corporate Services Group shall arrange regular preventive maintenance of all vault doors/BTS at least twice a year using duly authorized vendors.

- 2.23** All custodians to the Vault/Safe are individually and jointly responsible for the contents of the Vault/Safe.
- 2.24** Without prejudice to any of the above provisions, the primary custody of the Vault shall be the responsibility of the Head of the Centre.
- 2.25 Mutilated Notes**
- 2.25.1 CMC shall evacuate mutilated notes from branches and accumulate in CMC vault for deposit at CBN
- 2.25.2 **Periodic And Routine Cash Count Full** and detailed cash count shall be conducted at all CMC locations at least on a monthly basis by Head Office or Regional Internal Control and Head Office Banking Services
- 2.25.3 Daily cash count shall be conducted by the INTERNAL CONTROL OFFICER in conjunction with the vault custodians.
- 2.26 Withdrawal Of Unprocessed Cash From CBN**
- 2.26.1 CMC shall withdraw only processed cash from CBN
- 2.26.2 The Bank shall only undertake to collect unprocessed cash from CBN, only if the demand for the cash is urgent and other avenues for collecting processed cash from CBN or other Banks have failed.
- 2.26.3 An exceptional approval of the Group Head of Banking Services shall be obtained to withdraw unprocessed cash from CBN when it becomes inevitable to collect this type of cash
- 2.27 CMC CASH OVERAGES / SHORTAGES**
- 2.27.1 Cash transaction record must be balanced at the end of each business day. In the event of cash shortage or overage, the Head of Centre and the Cash Officer of the Centre shall be required to report the shortage or overage immediately to line manager with copy to the INTERNAL CONTROL OFFICER .
- 2.27.2 The INTERNAL CONTROL OFFICER shall be required to carry out independent transaction review and cash analysis of all cash supplied and evacuated for possible clue of the difference.

- 2.27.3 Where the difference cannot be traced within 24 hours, the Centre Head with the concurrence of the INTERNAL CONTROL OFFICER shall send a detailed report of the shortage/overage to Head of CMC at Head office for further review and recommendation to the Group Head, of Banking Services and the Chief Operating Officer.

## **2.28 Other Miscellaneous Responsibilities**

- 2.28.1 Cash Management Unit to monitor vault cash levels in branches to ensure compliance with advised vault insurance limits.
- 2.28.2 Treasury department shall be duly notified before cash withdrawals, lodgments' at CBN and cash swaps with other banks are made.
- 2.28.3 Each Regional CMC shall be equipped with a minimum of 1 sorting machine for cash processing.
- 2.28.4 The CMC operators shall ensure that branches comply with cash handling policies and procedures of the Bank e.g. cash must be in appropriate wrapper and strapped in bundles. Each wrapper must reflect note counter/Tellers stamp and signature.
- 2.28.5 The release of cash box combination shall be the sole responsibility of the CMC Regional Head or his authorized designate.
- 2.28.6 The channel to release the pelican lock combination shall be through the Bank's approved channels of communication to the designated officer only.
- 2.28.7 The Branch service manager or Cash Officer of each branch shall be the recipient of the pelican lock combination
- 2.28.8 The cash box lock combination shall be reset as frequently as possible

## **3.0 OTHER MATTERS**

### **3.1 Reconciliation of the Operating Cash Local Reserve and Interbranch Cash GL Account**

- 3.1.1 The Head of CMC Centres shall have responsibility for reconciling Inter-branch Cash GL accounts of all the branches within his region.

### **3.2 Cash Swap with Other Banks**

- 3.2.1 All Cash swaps with other Banks, including CBN withdrawals, shall be initiated by the Head CMC centre through the Branch service manager to the Group Head Banking Services
- 3.2.2 Cash swaps with other Banks/CBN shall only be done with the approval of the Treasurer.

- 3.2.3 Before cash is released to other Banks, Treasury Operations must confirm receipt of fund by RTGS or other means of funds transfer to PremiumTrust Bank account.

### **3.3 Cash Evacuation from Corporate Outlets**

- 3.3.1 The Bank shall not carry out cash evacuation activities from corporate outlets in line with CBN's directive.
- 3.3.2 Cash evacuation from corporate outlets would be carried out by CBN approved CIT companies.
- 3.3.3 Corporate Customers shall be advised liaise directly with any CBN approved CIT company for the evacuation of their cash to the Bank.

### **3.4 Cash Movement at Locations Where CIT Service is not available**

- 3.4.1 The Bank shall continue to use CBN registered Cash – In – Transit companies for movement of its cash except in locations where the Bank has not engaged the services of Cash-In-Transit Company.
- 3.4.2 Where the above is not in place, the Bank shall use its in-house bullion van with full complement of cash movement team with due approval by Management.

## CHAPTER 6: FUNDS TRANSFER

### SECTION I: GENERAL INTRODUCTION

Funds transfer involves activities relating to movement of funds within and outside the country. It could be between PremiumTrust Bank and other banks (Clearing/NIBSS) or within PremiumTrust Bank network (Inter/intra-Branch). It also includes foreign and local money transfer services. These activities shall be considered from the following perspective:

- i. Manager Cheque Issuance
- ii. Inter Bank Transfers
- iii. Money Transfers
- iv. Revenue Collection & Franchise Operations
- v. Standing Order
- vi. Proofs and reconciliation

### SECTION II: MANAGER'S CHEQUES

#### 1.0 INTRODUCTION

- 1.1 This section is aimed at providing the required operational framework and guidelines for treatment of Manager's Cheques.
- 1.2 Manager's Cheques: Manager's Cheque (MC) serves as Bank cheque issued to specified beneficiary on customer's request. A Branch usually draws the MC on itself.
- 1.3 Manager's cheque shall be issued on request from:
  - Account Holders
  - Walk-in customers
  - The Bank

#### 2.0 POLICY STATEMENTS

- 2.1 All Manager's Cheques issued shall be signed by two signatories, one of which must be from an A category.
- 2.2 Sole signatories may however be established through special recommendation by Group Head, Banking Services and approved by Executive Management from time to time. In this case, a **"Second Signatory Not Required"** stamp shall be affixed on the MC. The threshold shall not be more than N150,000( one hundred and fifty thousand Naira)
- 2.3 All Manager's Cheques must be specially crossed with the words "Account Payee Only, Not negotiable".
- 2.4 Manager's Cheque opened for cash shall only be issued in accordance with Regulatory restrictions on Cash payments across the counter on negotiable instruments.
- 2.5 Manager's Cheques must be issued only to named payees.



- 2.6 The amount on Manager's Cheques shall be specified in figures and words.
- 2.7 Asterisks or other appropriate symbols shall be printed in blank spaces to prevent alterations.
- 2.8 Blank spaces should be avoided between the currency symbol and the first digit of the amount to prevent the insertion of figures. Manager's Cheques shall not be issued bearing alterations or strikeover.
- 2.9 All MC issued must be recorded in a Register maintained at the branch. This shall capture all relevant details as name of beneficiary, amount, date, customer's name and account number, signature of purchaser and date of liquidation.
- 2.10 All MCs shall be issued serially
- 2.11 Voided MC shall be forwarded to the INTERNAL CONTROL OFFICER who shall note in the record that the MC was voided. The MC shall be perforated and filed.

#### **2.12 MC Issuance to Account Holders**

- 2.12.1 The Branch shall ensure that the customer's account is debited with face value and charges before issuance of the MC.
- 2.12.2 All MCs shall be prepared in line with customers' instructions. The Cheque must be embossed and recorded in the BC register.
- 2.12.3 Only authorized signatories shall sign the Manager's Cheques according to Premium Trust Bank mandate before releasing to the customer.

#### **2.13 Customer using savings account:** Item 1 above shall be amended as follows:

- 2.13.1 The MC request shall be accompanied by a withdrawal slip; the face value shall cover the amount of the MC and the beneficiary details shall be written on the reverse side.

#### **2.14 Walk-In Customers**

- 2.14.1 This class of request is made by persons who are non-account holders of the Bank but are ready to pay the charges in order to obtain the services. Since the client does not have an account with the Bank, all transactions are on cash basis.
- 2.14.2 Issuance of MCs to Walk-In customers shall be restricted only to such beneficiaries as Government Parastatals (PHCN, FRSC, LSWC etc.), schools, and educational bodies like ICAN, NIM, CIBN etc. The name of beneficiary shall be written in full and not abbreviated.

- 2.14.3 A valid means of identification shall be collected from Walk-in customers for MC issuance.

### 3.0 OTHER MATTERS

- 3.1 MC Liquidation Procedure:** Liquidation of Manager's Cheques shall be in line with the approved MC liquidation procedure as contained in Operations Process Manual.
- 3.2 Repurchase of Bank Cheque:** Where a Manager's Cheque is no longer required for the purpose for which it was purchased, it shall be cancelled on the customer's instruction and the proceeds credited to the account from which it was originally purchased. There must be written approval from Banking Services before a cheque is repurchased
- 3.3 Cancelled Manager's Cheque:** Where a Manager's Cheque is defective in writing or where for other reasons it cannot be issued to a customer, it shall be cancelled.
- 3.4 Stolen/Lost Manager's Cheque:** All cases of reported lost/missing Manager's Cheques issued to customers must be reported to the Group Head Internal Control & Compliance Hand cancelled on the System immediately.
- 3.4.1 The customer shall provide the following:
- i. Police report (of the loss)
  - ii. An affidavit from High Court
  - iii. A letter from the customer reporting the loss and requesting for a replacement. Only the purchaser (walk-in customer) or the authorized signatory (ies) to an account can sign such letter.
  - iv. Duly completed designated indemnity form of the Bank
  - v. All the above documentation shall be forwarded to Internal Control for verification.
- 3.5** The Group Head, Internal Control & Compliance shall have the responsibility of obtaining the approval of the Group Head, Banking services for the cancellation of the MC and issuance of a replacement.

## SECTION III: MONEY TRANSFER

### 1.0 INTRODUCTION

This section deals with all services that involve the transfer of funds, locally and internationally through an Electronic/Telegraphic means such as Western Union, MoneyGram and RIA etc.

### 2.0 POLICY STATEMENTS

- 2.1** The Bank shall carry out money transfer services on behalf of only licensed Money Transfer Organizations (MTOs).
- 2.2** The Bank shall offer Money Transfer services in line with the Service Level Agreement (SLA) and approved process for each category of product.
- 2.3** All Money Transfer transactions shall be paid in The Currency specified by CBN or any other currency as may be advised by regulatory authorities.

- 2.4** Beneficiaries/Receivers shall be required to provide proper and acceptable means of identification.
- 2.5** All Money Transfer services in the Bank shall be in line with the franchise agreement executed with the Money Transfer Organizations.
- 2.6** Western Union, MoneyGram and other money transfer receivers must be identified as advised by CBN and Money Transfer Regulators from time to time.
- 2.7** Money Transfer & Franchise Department shall be responsible for specifying documentation requirements and process flow for each product.
- 2.8** The receivers of all Money Transfer Services shall be required to provide secret code, and/identification as may be defined by the Central Bank of Nigeria from time to time in line with AML/CFT global requirements.

### **3.0 OTHER MATTERS**

- 3.1** Legal Services Department shall review all SLAs and Franchise agreement with Money Transfer Organizations.
- 3.2** Money Transfer CSC shall coordinate activities between Head office and payout locations.
- 3.3** Money Transfer CSC shall process remote transactions for branches when connecting links are down.
- 3.4** Money Transfer CSC shall ensure that settlements are done promptly for all payments made, branches GLs are credited appropriately and that all transactional issues are resolved.
- 3.5** BSMs shall monitor and ensure all Money Transfer accounts are reconciled promptly.

## **SECTION V: STANDING ORDERS**

### **1.0 INTRODUCTION**

This section covers the policies and general requirements relating to standing instructions by customers on movement of funds from one account to another or for settlement of third-party bills. The aim is to provide operational guidelines for the handling of standing order services offered by the Bank.

### **2.0 POLICY STATEMENTS**

- 2.1** Standing Order services shall only be rendered for account holders: current, savings, deposit or domiciliary.
- 2.2** Fees shall be taken on Standing Order request in line with the Bank's tariff (External transfers only).
- 2.3** Standing Order shall only be effected on adequately funded accounts as at the *Premium Trust Bank Bank Operations*

due date of the Order.

- 2.4** Standing Order request shall only be effective from the date of receipt of customer's instruction
- 2.5** Customers' instructions shall be in writing and signature verified.

## **SECTION VI: PROOFS AND RECONCILIATION**

### **1.0 INTRODUCTION**

This section provides guidelines for prompt resolution of open items in the Bank's General Ledger.

### **2.0 POLICY STATEMENTS**

- 2.1** The Bank shall always maintain clean books of accounts.
- 2.2** The reconciliation of open items shall be in accordance with the approved general reconciliation policy of the Bank.
- 2.3** No Branch shall have the authority to post into the GLs of another Branch.
- 2.4** General Ledgers that must carry NIL balances shall be checked on daily basis by branch operations staff to promptly detect and resolve any outstanding entry.
- 2.5** The tolerable age of an open item in the books of Branches and Head Office Departments for resolution shall not exceed 48 hours. Resolutions that exceed one week shall be referred to the Internal Control Department with evidence of earlier work done for immediate assistance and resolution.
- 2.6** The overall responsibility for reconciliation of the books lies with the BSM in branches

### **3.0 OTHER MATTERS**

- 3.1** All tickets for transactions posted to Branches GL accounts by Domestic Operations shall be advised to the Branches for documentary evidence. This shall be through transaction alert to the mail addresses of the BDM, BSM and INTERNAL CONTROL OFFICER of the Branches.
- 3.2** System initiated entries in the General Ledger shall first be reconciled by the respective operation units at the Branches and Head Office departments while those difficult to reconcile shall be referred to the Finance Department with evidence of earlier work done for immediate assistance and resolution.
- 3.3** Proof of each General Ledger shall be produced in line with its nature and use; daily, weekly or monthly which shall be submitted to the Internal Control & Compliance Department at Head Office.
- 3.4** The Internal Control Officer shall monitor the General Ledgers on daily basis and regularly scrutinize each open item in the proofs generated by the Branches or Head Office departments under his/her span of control. All exceptions observed

shall be brought to the attention of BSM or Head of Department.

- 3.5** Compliance and Control Group shall be responsible for review of all proofs of General Ledgers submitted to it from the Branches and query any open item that is above the stipulated time frame.

## **SECTION V: CHEQUE CONFIRMATION**

### **1.0 INTRODUCTION:**

This section deals with the guidelines for proper confirmation of Premium Trust Bank cheques issued by customers to third parties above a certain threshold.

### **2.0 POLICY STATEMENTS**

- 2.1** All cheques – Clearing and over the counter transactions, shall be confirmed in line with the minimum threshold set, from time to time, by Executive Management.
- 2.2** Notwithstanding the minimum threshold that may be established as stated above, a customer may request the Bank to confirm instruments of lower or higher value.
- 2.3** The Bank shall confirm cheques irrespective of the value, if the paying officer is put on inquiry.

### **3.0 OTHER MATTERS**

- 3.1** All cheque confirmation must be documented in writing by the confirming officer/branch to the paying branch/officer through the intranet, office communicator or behind the instrument.
- 3.2** Material information such as the amount, cheque number, account number etc. and importantly the name and full signature of the confirming officer must be disclosed.
- 3.3** For third party cheques, customers shall be encouraged to pre-confirm all their cheques before presentation and this shall be inputted on the Cheque Confirmation portal by the Relationship Officers/BSM.
- 3.4** For third party cheques not pre-confirmed by the account holder, efforts shall be made by officers of the Bank to get across to the customer for confirmation. However, where the customer cannot be reached and after exhausting all possible means, the cheque shall be returned and marked "Drawer's Confirmation Required (DCR)".
- 3.5** The Cheque confirmation shall be in line with the approved process as contained on the Bank's intranet (Premium Trust Bank X-net).

## **SECTION VI: SETTLEMENT OPERATIONS**

### **1.0 INTRODUCTION**

This section provides operating guidelines for activities in the Settlement Unit which include inter-branch posting into various GLs, payment to contractors/vendors, and payment for Head Office approved expenses, Issuance of Head Office Manager's Cheque/CBN

*Premium Trust Bank Bank Operations*

Cheques, GEFU upload on behalf of branches/Head Office departments.

## **2.0 POLICY STATEMENTS**

- 2.1 All payment shall be made in line with the Bank's approval process and authorization limits of designated Officers of the Bank.
- 2.2 All internal (Head Office and Inter-branch) posting shall be evidenced with a duly approved document in line with the Bank's expense processing policy.
- 2.3 No branch of the Bank shall be allowed to post transaction into the General Ledger of another branch. Where it is necessary to do so, such transaction shall be referred to Settlement Unit of Domestic Operations for posting.

## **CHAPTER 7: GENERAL ADMINISTRATION**

### **SECTION I: GENERAL INTRODUCTION**

This chapter provides general guidelines for Insurance administration, Building/premises occupancy, incidence reporting and management, temporary suspension of branch Operations and administrative responsibilities.

This chapter covers the following:

- i. Insurance Administration
- ii. Building/Premises Occupancy
- iii. Closed Circuit Television (CCTV)
- iv. Temporary Suspension of Branch Operations
- v. Mail Handling

### **SECTION II: BUILDING/PREMISES OCCUPANCY**

#### **1.0 POLICY STATEMENTS**

- 1.1 Minimum occupancy of branch building requires two members of staff (excluding security service staff, youth corps members and Interns).
- 1.2 The entrance doors keys for each branch shall be at least three copies to be held by the BDM, BSM and the weekly duty Officer.
- 1.3 BSMs shall prepare a weekly schedule for custodianship of entrance door(s) keys for the branch. Only confirmed Staff are allowed to hold the entrance door keys.
- 1.4 The branch shall maintain Entrance Door Key Register for documentation of the name of custodian, signature, date key was collected, and date key was handed-over to a new custodian.
- 1.5 Custodianship of the Bank's branch keys shall be the shared responsibility of both operations and marketing staff.
- 1.6 Off-hours occupancy of premises may be permitted for specific departments or group assigned working hours that differ from the normal working hours.
- 1.7 The BSM may designate specific individuals (e.g., Unit Head or most senior staff present) for the purpose of supervision during the off-hours, provided access to

*Premium Trust Bank Bank Operations*

vault and/or safe is not required. In such case, minimum occupancy of the premises shall be the designated supervisor and one other member of the Unit or Group.

- 1.8** A record of the arrival and departure times of everyone (including Officers) during off-hours occupancy shall be maintained and reviewed weekly by BSM and INTERNAL CONTROL OFFICER.
- 1.9** Loss of any of the entrance door keys shall be immediately reported to the Group Head, Internal Control & Compliance who shall ensure that the keys are changed before close of business same day.

## **2.0 OTHER MATTERS**

- 2.1** The following precautions shall be observed in opening and closing of the branch to the public:
  - 2.1.1** The exterior of the branch and surrounding area shall be inspected for signs of forcible entry or suspicious persons loitering in the area prior to opening the entrance door by the security personnel.
  - 2.1.2** Until opened to the public, only employee's security, cleaners, or vendors (where vendors have pending jobs to complete) shall be admitted to the premises.
- 2.2** The BSM shall ensure the presence of security operatives, i.e. police, before the vault is opened daily and Vault MUST be closed before the departure of the Police.
- 2.3** CCTV shall be installed in every business office and shall cover all critical areas. It shall be operated in line with the CCTV policy of the Bank.
- 2.4** Corporate services Department shall at regular intervals train branch personnel on actions to be taken in the event of a robbery attack or other security incidence.
- 2.5** The BDM and BSM are jointly responsible for the implementation, supervision, and enforcement of safety procedures. All employees must be cognizant of the various measures that shall be exercised in the daily safety routine. Therefore, all staff shall be trained to handle firefighting and security alarm equipment.

## **SECTION V: MAIL HANDLING**

### **1.0 INTRODUCTION**

This section deals with the guidelines for handling incoming and outgoing mails.

### **2.0 POLICY STATEMENTS**

- 2.1** All inward and outward mails in the Bank shall be handled with utmost confidentiality, care, and urgency it deserves.
- 2.2** Mail dispatch and receipt in the Bank shall be the responsibility of the Corporate

services Department.

- 2.3 Mail delivery in the Bank shall be handled by Courier Companies as appointed by the Bank, or any other Officer designated for such assignment.
- 2.4** No branch or Officer of the Bank shall send any official mail through unauthorized courier company.
- 2.5 No pre-printed Stationery or documents of the bank shall be dispatched by public transport

### **3.0 OTHER MATTERS**

#### **3.1 Incoming Mail**

- 3.1.1 All mails shall be examined upon receipt by the receiving Officer to ensure that they have not been tampered with especially Cheque books dispatched to the branches from the Cheque Book Service Unit.
- 3.1.2 Where evidence of tampering is established, the envelope or parcel shall be opened in the presence of the delivery Agent/Officer and the content verified.
- 3.1.3 At Head Office, all incoming mails shall be received by Head Office mailing room, time stamped and promptly delivered to the appropriate department.
- 3.1.4 At branches all incoming mails shall be received by the Customer Service Officers (CSO), time stamped, recorded and forwarded to the BSM who will in turn redirect the mails to the appropriate Officers.
- 3.1.5 Where mails are addressed to specific individuals, it shall be treated as above. However, where a mail is marked "confidential", it shall be delivered directly to the addressee.
- 3.1.6 All the Officers of such mails shall sign off on the register as evidence of receiving the mails.

#### **3.2 Outgoing Mails**

- 3.2.1 Outgoing mails containing security and financial instruments shall be handled with care.
- 3.2.2 Date, registration number, addressee and originating department of all mails shall be recorded in an outgoing mail register.
- 3.2.3 Envelopes and parcels returned by the courier company shall be delivered unopened to the originating branch or department.
- 3.2.4 For ease of identification, all outgoing mails shall be marked "Urgent", "Confidential", "Fragile" or sent as ordinary mail.



## **CHAPTER 8: MISCELLANEOUS**

### **SECTION I: CALL-OVER OF TRANSACTIONS**

#### **1.0 INTRODUCTION**

This section deals with guidelines for Call-over of processed transactions by all officers saddled with the responsibility of transactions review.

#### **2.0 POLICY STATEMENTS**

- 2.1** All transactions carried out must be reviewed and called over for completeness and validity daily
- 2.2** Call-over shall be done in the morning of the next working day (i.e. not later than 48 hours after posting).
- 2.3** 100% of processed transactions shall be called over.
- 2.4** There shall be more than one level of call-over; the first level shall be done by the processors by COB same day and the final level shall be done by the INTERNAL CONTROL OFFICER.
- 2.5** All exceptions noticed during call-over shall be investigated and followed up for correction within 24 hours.

#### **3.0 OTHER MATTERS**

- 3.1** The BSM/Supervisor shall ensure that first level call-over transaction tickets are exchanged among officers at the end of each day's activity. This is to ensure that posting errors are identified and corrected immediately.
- 3.2** BSM/Supervisors shall ensure that all posting officers submit their reviewed tickets to the INTERNAL CONTROL OFFICER daily at the close of business or before 10.00 a.m. the next working day.
- 3.3** BSM/Supervisors shall ensure the completeness of all batch tickets before they are submitted to the INTERNAL CONTROL OFFICER. Such tickets must be submitted in an envelope with the following information on the envelope:
  - i. Username and ID of the processing officer.
  - ii. Number of Credit/Debit tickets
  - iii. Confirmation of first level call over by the posting teller
  - iv. Posting date
- 3.4** Internal Control Officer shall maintain a ticket submission register (Call-over register) with the following headings: name, user ID of the processor, date of posting, date of submission, number of tickets, signature of the Processor and INTERNAL CONTROL OFFICER.
- 3.5** Internal Control Officer shall maintain a register of all exceptions (Exception Register) noted during the call-over exercise for necessarily follow up, correction and for the attention of the BDM, BSM and Supervisor and shall be logged on the system accordingly.

- 3.6** The Exception Register shall contain the following information: Date; Transaction Description, Amount, Nature of Exception, Name of processor, Response of Processor/Authorizer, Status of exception, Date of correction, and Signature of Call over officer.

**3.7 Storage of called over Tickets**

- 3.7.1 The INTERNAL CONTROL OFFICER shall be the sole custodian of all called-over tickets and the Call-over Register.
- 3.7.2 All called over tickets shall be properly arranged in an envelope with the User-ID of the posting officer on the envelope, date of transaction and number of tickets.
- 3.7.3 The INTERNAL CONTROL OFFICER shall ensure that called over tickets are moved to the Archives in the various locations according to the Bank's Record and Information Management Policy.
- 3.7.4 All transaction journal reports used in calling over must be properly filed in the same envelope that houses the day's called over tickets. This must be kept in a place that is free from unauthorized access and where it cannot be destroyed by water, pests, rodents or other environmental conditions.

**3.8 Ticket retrieval process.**

- 3.8.1 All requests for ticket retrieval shall be made in writing and duly approved by the BSM/Supervisor to the INTERNAL CONTROL OFFICER.
- 3.8.2** A Retrieval Register shall be put in place for the recording of movement of tickets and shall be duly signed off by retrieving Officer and the INTERNAL CONTROL OFFICER. The Register shall contain the following information: Date of Retrieval; Description of ticket; Reason (s) for retrieval; Name of retrieving officer; Signature of retrieving officer; Signature of INTERNAL CONTROL OFFICER; Date returned; Signature of returning officer; Signature of INTERNAL CONTROL OFFICER.
- 3.8.3 The INTERNAL CONTROL OFFICER shall ensure that retrieved tickets are returned by the retriever within 48hours unless it is being used by external examiners.

## **SECTION IV: ANTI-MONEY LAUNDERING MONITORING AND COMBATING THE FINANCING OF TERRORISM (AML/CFT)**

### **1.0 INTRODUCTION**

This section gives guidance on the Bank's commitment and staff's obligation in prevention of money laundering and combating the financing of terrorism.

### **2.0 POLICY STATEMENTS**

- 2.1** The Bank shall conduct its activities in compliance with the requirements of the Money Laundering (Prohibition) Act, 2011 (As amended), Terrorism Prevention Regulation, 2013 and CBN AML/CFT Regulation, 2013 or the subsequent amendments and any other related regulations enacted to combat money laundering and financing of terrorism.

### **3.0 STAFF OBLIGATION**

#### **3.1 AML/CFT Awareness:**

Every staff must be aware of the Bank's approach to the identification, mitigation and management of money laundering and terrorism financing risks.

Staff must be conversant with the procedures and controls to be applied in handling AML/CFT issues as set out in the Bank's Anti-Money Laundering and Combating Financing of Terrorism Compliance Policy. In line with regulatory requirement, all staff shall be trained regularly on AML/CFT.

#### **3.2 Suspicious Transaction Monitoring and Reporting:**

Customer's accounts and transactions shall be subjected to sufficient scrutiny to detect activities that may be indicative of fraud, money laundering, terrorism financing or any other illegal act.

Staff involved in establishment of account relationships and processing of transactions shall watch out for unusual activities/transactions and shall report the customer and transactions to the Compliance Group.

Staff who deliberately fail to report suspicion concerning customer and transaction when he/she is reasonably expected to have done so may be deemed to have committed an offence under the law.

Staff must not tip-off (intimate or warn) customer of suspicious transaction report rendered in respect of his account or transactions.

- 3.3 Adherence to Know-Your Customer and Due Diligence Requirements:** Adequate Know-Your-Customer and Due Diligence measures shall be taken when establishing business relationships and for on-going dealings with customers as set out in the Bank's KYC Manual.

#### **3.4 Record Keeping:**

Records of customers' transactions, account files and business correspondences shall be preserved for a minimum period of five years after the termination of an account or business relationship.

It is the responsibility of the Heads of Departments and Branch service managers to ensure that records are kept safely, securely, and away from unauthorized access

in line with the Bank's Records and Information Management Policy. The Bank's records must be readily accessible upon legitimate requests.


### 3.5 Co-operation with Regulatory and Law-Enforcement Authorities:

The Bank shall co-operate adequately with the regulatory and law enforcement authorities. Legitimate requests for, but not limited to, provision of account documents and restriction of accounts shall be promptly complied with.

This policy Manual is expected to adhere to by all officers of the branches and any deviation of the policy must be accompanied by appropriate approval.

X Recommended by :   
 Adaobi Adama- **Banking Services Group**

Concurrence   
 Tolulope Ogundipe- **Banking Services Group**

✓  
 Approved   
 Cyril Osheku – **Chief Operating Officer**

Approved \_\_\_\_\_  
 Emmanuel Emefienim- **Managing Director/CEO**

**August 2022**