



CitiDirect BE<sup>®</sup>

EMEA Anti-Money Laundering

Frequently Asked Questions

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Treasury and Trade Solutions



## What is AML legislation and how does it affect me?

Anti-Money Laundering (AML) legislation gives banks a mandatory duty to collect documents from, and verify the identity of, each person who authorises payment transactions on an account held in an AML regulated country.

Therefore, if you need to process transactions on any such accounts **you may need to supply Citi with suitable identity documents**. Otherwise, your ability to process those transactions may be restricted or removed.

For specific details of the AML legislation in each country refer to the country-by-country AML requirements documents, available separately.

## Which EMEA countries have this AML legislation?

In EMEA, AML legislation applies to transactions made on accounts held in the following countries:

Austria	Finland	Netherlands	Russia
Bahrain	France	Nigeria	Senegal
Belgium	Germany	Norway	Slovakia
Bulgaria	Greece	Pakistan	South Africa
Cote d'Ivoire	Hungary	Poland	Spain
Czech Republic	Kazakhstan	Portugal	Sweden
Denmark	Kuwait	Qatar	Turkey
Egypt	Luxembourg	Romania	Ukraine

## How do I know if you need my documents?

If you have access to any of the following functions, for accounts held in an AML regulated country, you need to supply documents.

- **Payments Initiation**  
Any payment authorization function (e.g. **To Authorize**, **Batch Authorize**, **File Authorize** etc.).
- **Receivables & Collections Initiation**  
Any authorization function (e.g. **To Authorize**, **Batch Authorize** etc.).
- **Import Transactions**  
The **To Run** and/or **To Authorise** functions. This includes files submitted through CitiConnect.
- **Schedule Files and Reports (previously known as AFRD)**  
If you are the schedule owner of a file import schedule.
- **Service Requests (previously known as Administrative Messages)**  
The **To Authorize** function.

For **Client Linkage**, note that the above list applies whether the AML regulated country accounts are associated to your home client definition or the **Linked To** client definition.

The functions listed above are only AML regulated when they are used in relation to an account held in an AML regulated country. For example, import of a transaction for an account held in Turkey.

You do not need to supply documents if you only use the above functions for accounts held in countries that are not on the AML regulated list.

I'm not sure if I have access to any of the regulated functions or branches.  
How can I check?

Your Security Manager will be able to review your entitlements and check your access.

If you do not have a Security Manager at your organisation you will need to contact your usual EB Support or Customer Services representative.

I don't authorise transactions, do you still need to see my documents?

Generally, only a user who can authorise transactions on AML regulated accounts must provide proof of their identity. However, depending on how your workflows have been set up in CitiDirect BE, there may be a requirement for you to supply identity documents *even if you do not authorise such transactions.*

Users who do not authorize transactions must provide identity documents if:

- They are the **inputter** of a transaction where the transaction's workflow has neither authorization nor verification steps.
- They are the **verifier** of a transaction where the transaction's workflow has no authorization step.

As an example, if you are the transaction inputter for a regulated account and your payment workflow does not require a verification or authorization step, you will be required to provide identity documents. Transactions you attempt to input will be rejected if you have not provided suitable documents.

What documents do you need from me?

Full details of the documents required are given in the EMEA AML Requirements Schedule or the country-by-country AML requirement documents available in the Learning and Communications section of CitiDirect BE.

Do you need the originals?

Originals may not always be necessary. For details, please refer to the EMEA AML Requirements Schedule or the country-by-country AML requirement documents in the Learning and Communications section of CitiDirect BE.

When do I need to send my documents?

We recommend that you supply documents as soon as possible because your ability to process transactions for AML regulated countries may be restricted or removed until your documents have been reviewed.

Where should I send my documents?

For details of where to send documents please refer to the EMEA AML Requirements Schedule or the country-by-country AML requirement documents in the Learning and Communications section of CitiDirect BE.

How do I find my security manager's name?

In CitiDirect services select **Tools & Preferences > Access Administrator Contacts** to see a list of people to contact. If you do not have a Security Manager, you should contact your usual EB Support or Customer Services representative for assistance.

I can't authorise transactions in CitiDirect BE.

Is this because I need to supply identity documents?

This depends on whether you can see the transaction you want to authorize in CitiDirect BE or not.

- **I can see the transaction but get an error when I try to authorize it.**  
If the error says you do not have the necessary entitlements, this will be because your documents have not yet been reviewed and AML approved. You should either supply your documents as soon as possible or, if already sent, you or your security manager should contact Citi to review the status of document approval.
- **I cannot see transactions that I know are waiting for authorization.**  
In this situation the issue will not be related to your AML approval. Instead it will be because your entitlements in CitiDirect BE do not allow you to authorise the transaction. For example, the transaction may be marked as confidential, but you have not been given access to confidential payments. In these situations, you should contact your security manager to review your entitlements.

You've asked for my documents, but I don't think I need to supply them.

What should I do?

If your security manager has given you any of the entitlements that trigger the need for AML approval Citi will have automatically contacted you about the need to supply documents in order to process transactions.

However, if you know that you do not, and will not, need to use any of the functions that require AML approval you may safely ignore any AML notifications Citi may send you.

But we do suggest that you contact your security manager to review your entitlements and, if possible, remove the unnecessary items that have triggered AML notifications.

For details of the entitlements that will give triggered Citi to send you an AML notification please refer to the [How do I know if you need my documents?](#) question.

You've asked me for documents for some countries but I expect to be given access in future to other AML countries. Should I send documents for those countries now, or wait until you ask for them?

If you are happy for Citi to hold your documentation until it is required, we would recommend that you send us documentation now to meet the AML requirements of the countries for which you expect to be given access in the future.

<b>Why didn't you ask me for these documents earlier, when I was first set-up on CitiDirect?</b>	Citi will always ask for documentation at the earliest possible opportunity. Generally, there are two reasons why this might not be during the initial CitiDirect BE set-up process.
	Firstly, it may be because new AML regulations have been passed since you were first set-up and, as a result, there is now a requirement for documentation that did not exist before.
	Alternatively, this could be because, at time of set-up, it was not made clear to us that you would in future need access to one of the AML regulated functions. For example, you were not identified as a transaction approver for an AML regulated country.
<b>I process transactions for AML and non-AML countries.</b>	No. The need to provide documents applies only to the AML countries and any restriction or removal of access that happens whilst we wait for your documents will only apply to those AML countries.
<b>If I don't send my documents will it affect my access to non-AML countries?</b>	If you have entitlements to other countries, those entitlements will continue without interruption.
<b>I'm worried about the security of my documents.</b>	Citi has very strict information security standards and will keep all original and electronic versions of your documents secure and confidential.
<b>How can you guarantee they will be safe and won't be used or viewed by any unauthorised personnel?</b>	Only approved Citi staff will be able to access your documents and they will only access them for the purpose of compliance with AML regulations.
	In addition to the above, we may disclose your documents to regulators, if required to do so by law.
<b>You haven't asked for my documents but I do need access to AML regulated functions.</b>	If Citi has not contacted you about the need to supply documents you should contact your Security Manager as soon as possible. Your Security Manager will be able to review your entitlements and, if necessary, contact Citi on your behalf.
<b>What should I do?</b>	If you do not have a Security Manager at your organisation you should contact your usual EB Support or Customer Services representative who will be able to review your entitlements and advise next steps.

I'm a Security Manager. From an AML perspective, is there anything I should consider when creating or updating users in CitiDirect BE?

If the user will have, either immediately or in the future, access to any of the AML regulated functions you should, as part of creating or updating the user's profile/entitlements, collect and send to Citi any identity documents required by the relevant country. Upfront collection will minimise any disruption to their ability to perform their role.

Please note that it is a strict AML requirement for the user's name in CitiDirect BE to exactly match their name as it appears on their identity documents (their passport, for example). Therefore, do please ensure that their first name, surname and any middle names are entered into CitiDirect BE **exactly** as shown on their identity documents. If the user profile in CitiDirect BE does not exactly match the identity documents ***it will not be possible for Citi to provide AML approval for the user.***

Note that any subsequent change to the user's name in CitiDirect BE will result in ***all AML approval being revoked*** if matching identity documents are not supplied to Citi ***within 30 days of the name change being authorized*** in CitiDirect BE. Therefore, care should be taken with the timing of any user profile updates to avoid the risk that the user will lose access to AML regulated accounts.

I'm a Security Manager.  
What are the entitlements that mean my users will need to supply documents?

Your users will be affected if:

1. You assign to them an access profile that contains any of the following entitlements:
  - Payments Initiation
  - Receivables & Collections Initiation
  - Import Transactions
  - Service Requests (previously Administrative Messages)
  - Schedule Files and Reports (previously AFRD)If the user will be the schedule owner of a file import schedule.

For the first four of these items, unless you have workflows that allow for transactions to be initiated without an authorization step, you only need to consider access profiles that allow the authorization function. If your workflows do permit processing without authorization, please refer to the [I don't authorise transactions, do you still need to see my documents?](#) question for details of the non-authorization processes that will drive AML requirements.

AND

2. You assign to them an access profile that allows access to any account for an AML regulated country for any of the functions listed in point 1. This means both an access profile that specifically lists account(s) plus an access profile that gives access to all accounts by not listing any specifically. Remember, not specifying accounts in an access profile means that all accounts are available to the user.

For users with [Client Linkage](#) access, note that the above applies whether the AML regulated country accounts are associated to their home client definition or the [Linked To](#) client definition.

Be aware also that updating existing access profiles may impact the AML approval status of users to whom those access profiles are already assigned. For example, adding any of the above functions to an existing access profile will immediately mean all users with that access profile require AML approval. The same applies if you update an existing access profile to add access to an AML regulated account.

I'm a Security Manager.  
How can I check the accounts and functions to which my users have access?

CitiDirect BE provides four key reports that you can leverage to determine and review your users' access rights. All four reports can be found under the menu option **Reports & Analytics > Operations Reports > Access Management Reports**.

The first stop in reviewing AML related access rights should be the **AML User by Client Report**. This report shows all users with access to an AML regulated function on an account held in an AML regulated country. It shows the user's name, the Citi branch(es) where the AML regulated account(s) are held and gives details of the user's AML status (e.g. whether they have been AML approved for a country, not approved or pending document review).

Additionally, this report will show you if, for a specific country, an expiry date has been set for the user's AML approval. You will need to take note of any expiry date because, after the date, the user will not be able to process transactions for that specific country until documents have been submitted and reviewed by Citi; transaction processing for countries for which an expiry date is not shown will not be affected. Note that expiry dates are governed by local AML regulations in the country rather than by Citi processing requirements. This means that Citi has no flexibility over the application of the expiry date for a user's AML approval.

If you are not sure why a user appears on the **AML User by Client Report** you can use the three reports described below to build a detailed picture of the user's entitlements.

- **User Profile and Entitlements Report**

This report provides information from the user's profile (such as name, email ID and so on) together with a list of all access profiles (user entitlements) that have been assigned to the user.

- **Access Profile Detail Report**

This report provides you with a detailed list of your access profiles and the functions they enable. In conjunction with the **User Profile and Entitlements Report**, this report lets you identify which of the access profiles assigned to a user allow access to the AML regulated functions (e.g. the **To Authorize** function for **Payments**). Additionally, this report shows you the accounts that are enabled by an access profile. Remember, if an access profile does not list specific accounts it gives a user access to **all** accounts.

- **Account Management Summary Report**

Use this report to obtain a list of all the accounts associated with your client definition and the high-level functions for which they have been enabled (e.g. **Payments**). Where an access profile does not list specific accounts, this report lets you identify all the accounts you have that are held in AML regulated countries and that will all therefore be enabled for users with the access profile.

I'm a Security Manager.

What is the AML User by Client Report and how should I use it?

The **AML User by Client Report** is a key resource for you in identifying, monitoring and managing the AML approval status of your users.

The report shows all users with access to an AML regulated function on an account held in an AML regulated country. It shows the user's name, the Citi branch(es) where the AML regulated account(s) are held and gives details of the user's AML status (e.g. whether they have been AML approved for a country, not approved or pending document review).

To access the report select **Reports & Analytics > Operations Reports > Access Management Reports > AML User by Client Report**.

For general information on how to edit and run CitiDirect BE reports please refer to the guide available online in CitiDirect BE accessed via the menu option **Self Service > Learning and Communications > User Guides & FAQs > Reporting**.

Specifically for the **AML User by Client Report**, the details on the following pages will help you interpret the report and identify actions you may need to take.

## AML User by Client Report

### Interpreting the Report Results

### The Status & AML Approved Fields

The Status and AML Approved fields together indicate the users who must supply documents for a branch and whether those documents have been reviewed by Citi. The key statuses for you to consider, and actions to take, are described below:

- **Record in Input State**

This is for any user where Citi has identified that they have access to an AML regulated function, but for whom documents have yet to be supplied to Citi, or have been supplied but are still being reviewed. At this stage, the user will not be able to perform AML regulated functions (e.g. transaction authorization for AML countries).

**Action - Ensure all Input status users are aware of the need to supply documents and have either done so or are in the process of doing so.**

- **A Processed Record**

This is for any user for whom Citi has completed the AML review process. Processed users have an AML Approved value of Yes or No.

- **AML Approved = Yes**

The user has supplied appropriate documents and been approved by Citi for the applicable AML branch. These users are able to perform AML regulated functions (e.g. approve transactions).

**Action - Notify these users that AML review is complete and they can perform their role for the countries where they have approval.**

- **AML Approved = No**

The user has either not supplied any documents, or has not supplied appropriate documents; they have therefore not been approved by Citi for the applicable AML branch. These users **will not be able to approve transactions** and fall into three categories:

1. Users who have access to AML regulated functions but who do not need those functions to perform their role and have therefore chosen not to supply documents.

**Action - Review the user's entitlements and remove the AML regulated functions that they do not need for their role.**

2. Users who need access to AML regulated functions but have not supplied documents.

**Action - Contact the users to understand why documents have not been submitted to Citi.**

3. Users who need access to AML regulated functions but have supplied documents that are not sufficient to allow Citi to grant AML approval.

**Action - Contact your usual Citi representative to discuss why the documentation was not sufficient and what further actions may be possible.**

Other statuses on the report are for Citi's use in tracking users through the document review process; only consider users in these other statuses if you are contacting Citi to review the status of on-going document review.

Note that to successfully perform any AML regulated function a user must have a Status of **A Processed Record** and an AML Approval indicator of **Yes** for the branch.

## AML User by Client Report

### Interpreting the Report Results

### The Expiry Date Field

For some AML regulated countries Citi is required to give an end date to a user's AML approval. For example, local regulation may require us to limit a user's approval in line with the expiry date of their passport. The Expiry Date field on the report shows when a user's approval has been time-limited in this way. The field, and any actions to take, are described below:

- **No expiry date is shown on the report**

This means that the user will remain AML approved until either

1. You make changes to the user's profile or entitlements or
2. Citi is required to change the user's AML approval as a result of a change in regulations.

Action - No action is required but do consider the impact of future user profile and entitlement changes on the user's AML approval.

For more information refer to the FAQs

- *I'm a Security Manager. From an AML perspective, is there anything I should consider when creating or updating users in CitiDirect BE?*
- *I'm a Security Manager. What are the entitlements that mean my users will need to supply documents?*

- **An expiry date is shown on the report**

The user is AML approved up to and including the date shown. After the expiry date the user **will not be able to perform any AML regulated functions for accounts held at the branch**.

Action - As the expiry date approaches, contact the user to arrange for them to supply the necessary documents to extend approval (as set out in Citi's AML schedules and guidance notes).

To ensure that there is no break in the user's AML approval Citi recommends that new documents are submitted well before the expiry date.

Beginning the process of collecting and submitting documents 90 days before the expiry date is generally considered best practice.

## AML User by Client Report

### Tips for Creating and Running the Report

### Setting the criteria

The following notes will help you identify the values to set when creating and running the **AML User by Client Report**.

- **Client Name**  
Select a value if you have access to multiple client definitions in CitiDirect BE (e.g. via the **Client Linkage** function); otherwise, leave this field blank.
- **User Name**  
Leave blank to run a report across all your users or select specific users to narrow the report results.
- **Branch**  
This is mandatory; you must select at least one branch. The report only returns information for the branch or branches you select. To ensure nothing is missed, unless you are only interested in a specific branch, Citi recommends that you always run the report for all available branches.
- **Status and AML Approved**
  - To identify users who need to supply documents select -  
Status = **Record in Input State**.  
AML Approved = Do not select a value.
  - To identify users who are AML approved select -  
Status = **A Processed Record**.  
AML Approved = **Yes**.
  - To identify users who have been declined AML approval select -  
Status = **A Processed Record**.  
AML Approved = **No**.
- **Expiry Date**  
Only set this if you need to find users whose AML approval status has an expiry date set. Otherwise, as most countries do not require Citi to set an expiry, it is recommended that you leave the default setting of **No Date Selected**.
- **Remediation Status**  
Note that this selection is used for internal Citi purposes; you should leave it blank when creating your report.

## AML User by Client Report

### Tips for Creating and Running the Report

### Managing AML Expiry Dates

The **AML User by Client Report** is your key resource for identifying users with upcoming AML expiry dates and for managing the process of extending their AML approval.

Citi recommends that you set-up a report template that will identify such users and that you run it at least once each month. The CitiDirect BE **Schedule Files & Reports** functionality can be leveraged to run the report for you automatically and deliver to you via email; refer to the online guides in CitiDirect BE for more information on scheduling reports.

To create a report that will identify users with upcoming AML expiry dates, make the following report selections:

- **Client Name**  
Leave this blank unless you have access to multiple client definitions in CitiDirect BE. In the latter case select the client definition that is the home client definition of your users (i.e. the definition under which their user profile is built).
- **User Name**  
Leave this blank.
- **Branch**  
Select all available branches.
- **Status**  
Select Status = **A Processed Record**
- **AML Approved**  
Select AML Approved = **Yes**
- **Expiry Date**  
Set a date range starting from the current date running for 90 days into the future. If you are planning to run the report automatically using the report scheduling tool, please ensure that you use the relative date range, not the absolute date settings.
- **Remediation Status**  
Leave this blank.

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