



## CENTRAL BANK OF NIGERIA

Financial Policy & Regulation Department  
Central Business District  
P.M.B. 0187  
Garki, Abuja.

Tel: 09-46237404.....  
E-mail: [fprd@cbn.gov.ng](mailto:fprd@cbn.gov.ng)

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**OUR REF:** FPR/DIR/CON/BOF/01/036

### **Letter to All Deposit Money Banks, Discount Houses and Other Financial Institutions**

**Attention: Chief Compliance Officer**

#### **ISSUANCE OF AML/CFT RBS RETURN TEMPLATE, QUESTIONNAIRE, OTHER FORMATS AND EXPLANATORY NOTES**

The CBN has commenced the full implementation of its gazetted Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) Risk Based Supervision (RBS) Framework, 2011. This measure is further supported by the importance the Financial Action Task Force (FATF) has attached to the Risk Based Approach (RBA) to AML/CFT supervision in its Revised 40 Recommendations issued on 16<sup>th</sup> February, 2012.

Successful implementation of RBA to combating money-laundering and terrorist financing depends **on a sound understanding of the threats and vulnerabilities of the menace to each financial institution in particular and the entire financial industry in general**. In order to achieve the above objective, the CBN and NFIU jointly developed and held workshop with the stakeholders on **AML/CFT risk assessment template, questionnaire and other formats** to be used to collect ML/FT risk information from financial institutions under CBN's regulatory purview.

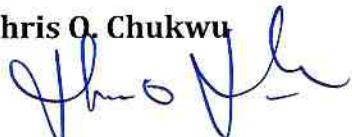
**The risk assessment template (attached as Form 001)** is designed to gather statistics on ML/FT risks associated with the structural factors and the significant activities/transactions performed by financial institutions. Such activities include the

lines of business, customers, products and transactions undertaken by your institution. The **risk assessment questionnaire (attached as Form 002)** is designed to obtain information that would enable the Bank Examiners assess the adequacy or otherwise of the control functions in place to **mitigate the ML/FT risks identified** in your institution. **Other AML/CFT Templates (attached as Forms 003 to 011)** provide uniform formats for all financial institutions to render their returns for ease of processing by the CBN and NFIU.

You are, by this letter, requested to render AML/CFT returns on **Forms 001 and 002** to the CBN only with **effect from the end of August, 2012** and on **Forms 003 to 011** to both the CBN and NFIU at the appropriate period.

For further clarifications outside the **Explanatory Notes attached**, please contact Mr. U. A. Obot via e-mail [uaobot@cbn.gov.ng](mailto:uaobot@cbn.gov.ng).

Chris O. Chukwu



Director, Financial Policy and Regulation Department

**FORM 001**

**AML/CFT RISK ASSESSMENT MONTHLY REPORT**

**FOR THE MONTH OF \_\_\_\_\_**

**NAME OF REPORTING  
INSTITUTIONS:**

**ADDRESS OF REPORTING INSTITUTION:**

**YEAR OF ESTABLISHMENT:**

**TOTAL ASSETS SIZE (N'000):**

**GROSS INCOME/PROFIT:**

**OWNERSHIP STRUCTURE:**

**PUBLIC -  
PRIVATE -**

**NO. OF SUBSIDIARY(IES)/OTHER GROUP MEMBERS:**

**LOCAL -  
FOREIGN -**

**CONTACT PERSON:  
NAMES -  
DESIGNATION -  
TELEPHONE NO -  
E-MAIL ADDRESS -**



#### **TYPE OF CUSTOMERS**



#### **NATURE OF CUSTOMERS- ACCOUNT BALANCES FOR:**

**NATURE OF CUSTOMERS- ACCOUNT BALANCES FOR:**

**NATURE OF CUSTOMERS' BUSINESS**

**DESIGNATED NON-FINANCIAL INSTITUTIONS (DNFIs) CUSTOMERS- ACCOUNT BALANCES FOR:**

**HOTELS**

**JEWELLERY DEALERS**

**CAR & LUXURY GOOD DEALERS**

**INVESTMENT BROKERS**

**No.**

**#'M**

**\$'000**

**No.**

**#'M**

**\$'000**

**No.**

**#'M**

**\$'000**

**No.**

**#'M**

**\$'000**

NATURE OF CUSTOMERS' BUSINESS

**DESIGNATED NON-FINANCIAL INSTITUTIONS (DNFIs) CUSTOMERS- ACCOUNT BALANCES FOR:**

**NATURE OF CUSTOMERS' BUSINESS**

NATURE OF CUSTOMERS' BUSINESS

## CASH-INTENSIVE BUSINESS CUSTOMERS- ACCOUNT BALANCES FOR:

















DEALINGS WITH PERSONS/SUBSIDIARIES RELATED TO YOUR FINANCIAL INSTITUTION	AML/CFT PENALTIES & FINES IMPOSED BY REGULATORY AUTHORITIES, COURTS, ETC
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## **EXPLANATORY NOTES FOR FORM 001**

### **AML/CFT RBS MONTHLY REPORTING TEMPLATE**

#### **1.0 INTRODUCTION**

##### **1.1 NAME OF THE REPORTING INSTITUTION:**

This is the registered name of the reporting institution.

##### **1.2 ADDRESS OF THE REPORTING INSTITUTION:**

This is the registered office address of the reporting financial institution.

##### **1.3 YEAR OF ESTABLISHMENT**

This is the year in which the reporting institution was initially licensed by the CBN.

##### **1.4 TOTAL ASSET SIZE**

This is the financial institution's balance sheet size.

##### **1.5 GROSS INCOME**

This refers to the financial institution's annual gross income.

##### **1.6 OWNERSHIP STRUCTURE**

Indicate the number of significant shareholders who have 5% interest and above.

##### **1.7 SUBSIDIARY**

Where a financial institution has subsidiaries (whether local or foreign), the number should be stated and where the bank is in holding company structure, state the number of members in the group.

## **2.0 BRANCH INFORMATION**

### **2.1 LOCATION/ADDRESS**

This is the place where the branch is located in the town/city, etc..

### **2.2 STATE**

Indicate the State in the Federation where the branch is located.

### **2.3 NO. OF CUSTOMERS**

Indicate the total number of customers that the branch maintains as at the end of the reporting month.

## **3.0 TYPE OF CUSTOMER**

### **3.1 INDIVIDUAL**

Indicate the total number of accounts opened by individual natural persons and the total amount (in naira for the naira accounts and foreign currency in United States Dollars for ease of collation).

### **3.2 CORPORATE**

Indicate the total number of accounts opened by corporate/legal persons and the total amount (in naira for the naira accounts and foreign currency accounts in United States Dollars for ease of collation).

### **3.3 OTHERS**

All other type of customers that cannot be classified under "Individual" or "Corporate" should be captured in this category. This includes religious organization accounts; charities/clubs & societies accounts; clients'/executorship/trust, nominees and fiduciary accounts; three tiers of government & parastatals accounts; off-shore trust/SPVs' and miscellaneous accounts consisting of asylum seekers' accounts; students/minor accounts; conventional family & absolute Nigerian trust accounts, etc.

## **4.0 TOTAL DEPOSIT TRANSACTIONS**

This is the total deposit transaction value for the reporting month in naira for naira transactions and US dollar equivalent for dollar and other currencies.

## **5.0 NATURE OF CUSTOMER**

### **5.1 FINANCIAL INSTITUTIONS (FIs)**

Where the nature of a customer's business is that of a financial institution, the total number and value should be stated (see Section 25 of the Money Laundering (Prohibition) Act (MLPA) 2011 for the definition of a financial institution).

### **5.2 POLITICALLY EXPOSED PERSONS (PEPS)**

The term "politically exposed persons" includes individuals who are or were entrusted with prominent public functions in Nigeria and/or foreign countries and people/entities associated with them. See section 1.10.1 of CBN AML/CFT Regulation, 2009 (as amended) for detailed explanation.

### **5.3 FINANCIALLY EXPOSED PERSONS**

Financially exposed persons (FEPs) are those individuals who hold executive management or board positions in the large companies and have access to corporate wealth due to their positions within the corporation.

### **5.4 NON-GOVERNMENTAL ORGANISATIONS (NGOs) /NOT-FOR PROFIT ORGANISATIONS (NPO)**

NGOs are private non-profit organizations that pursue activities intended to serve the public good. NGOs may provide basic social services, work to relieve suffering, promote the interests of the poor, bring citizens' concerns to governments, encourage political participation, protect the environment, or undertake community development to serve the needs of citizens, organizations or groups in one or more of the communities that they operate. An NGO can be any non-profit organization that is independent from government. NGOs can range from large regional, national or international charities to community-based self-help groups. NGOs here include research institutes, churches, professional associations and lobby groups. NGOs typically depend (in whole or in part) on charitable donations and voluntary service for support. They are incorporated by the Corporate Affairs Commission (CAC) and required to register with the Special Control Unit (SCUMUL).

### **5.5 OIL AND GAS COMPANIES**

These are companies (customers of the institution) involved in both upstream and downstream sectors of the oil industry. They are important money laundering prone customers and their operations often involve the use of foreign currencies.

## **5.6 OTHERS**

These are customers that cannot be classified as FIs, PEPs, FEPs, OIL AND GAS or NGOs.

## **6.0 NATURE OF CUSTOMERS' BUSINESS**

### **6.1 DESIGNATED NON-FINANCIAL INSTITUTIONS (DNFIs) CUSTOMERS**

These mean dealers in jewelry, cars and luxury goods, chartered accountants, audit firms, tax consultants, clearing and settlement companies, legal practitioners, hotels, casinos, supermarkets, or such other businesses as the Federal Ministry of Trade and Investment or appropriate regulatory authorities may from time to time designate. See Section 25 of MLPA, 2011 and CBN circular referenced FPR/CIR/GEN/VOL.1/028 ON Additional KYC Requirement in respect of DNFBPs of 2<sup>nd</sup> August,2012.

### **6.2 CASH INTENSIVE BUSINESS CUSTOMERS**

Common examples of cash intensive businesses **include but are not limited to**, the following:

- i. **Money Service Business (MSB)** – This includes currency dealers; money transmitters; cheque cashers; and issuers of travellers' cheques, money orders, or stored value.
- ii. **Bureaux de change** – Although this falls under the MSBs, it is reported separately based on its ML/TF vulnerability.
- iii. **Vending machine operators** – These are companies that own machines which dispense items such as snacks, beverages, alcohol, cigarettes, lottery tickets, consumer products and even gold and gems to customers automatically after the customer inserts currency or credit card.
- iv. **Privately owned automated teller machines (ATM).**
- v. Convenience stores.
- vi. Restaurants.
- vii. Retail stores.
- viii. Liquor stores.
- ix. Cigarette distributors.
- x. Parking garages.
- xi. Others.

Financial institution's systems are therefore required to manage the risks associated with cash-intensive businesses. The affected entities are expected to have adequate processes

in place and their managements are required to have the ability to implement due diligence, monitoring and reporting systems effectively.

Cash-intensive businesses and entities, however, cover various industry sectors and most of them conduct legitimate businesses. Notwithstanding, some aspects of these businesses may be susceptible to money laundering or terrorist financing.

## **7.0 PRODUCTS AND SERVICES**

### **7.1 CURRENT ACCOUNTS**

All transactions conducted by current account holders (both individual and corporate entities) for the reporting period should be stated.

### **7.2 SAVINGS ACCOUNTS**

All transactions conducted on all forms of savings accounts (irrespective of the product name used) for the reported period should be stated.

### **7.3 TIME DEPOSIT ACCOUNTS**

Tenored deposit accounts operated by customers for the month should be stated.

### **7.4 DOMICILIARY ACCOUNTS**

These are accounts that are operated in foreign currencies as either export proceeds or ordinary domiciliary accounts. These accounts can be funded through travellers' cheques, lodgement of foreign currency cheques, foreign currency cash inflows and cash deposits.

### **7.5 CONCENTRATION/SUSPENSE AND OTHER SUCH ACCOUNTS**

Concentration accounts are internal accounts established to facilitate the processing and settlement of multiple or individual customer transactions within the financial institution, usually on the same day. These accounts may also be known as **special-use, omnibus, suspense, settlement, intra-day, sweep, or collection accounts**. Concentration accounts are frequently used to facilitate transactions for private banking, trust & custody accounts, funds transfers and international affiliates.

### **7.6 ELECTRONIC CASH ACCOUNTS**

**E-cash (e-money) is a digital representation of money. E-cash comes in several forms including computer-based, mobile telephone-based and prepaid cards.** Computer e-cash is accessed through personal computer hard disks via a modem or stored-in-an-online repository. Mobile telephone-based e-cash is accessed through an individual's mobile telephone. Prepaid cards,

discussed in more detail below, are used to access funds generally held by issuing financial institutions in pooled accounts.

In the case of computer e-cash, monetary value is electronically deducted from the financial institution account when a purchase is made or funds are transferred to another person.

### **7.7 DEPOSIT BROKERED ACCOUNTS**

The use of brokered deposits is a common funding source for many banks and other financial institutions. Recent technological developments allow brokers to provide bankers with increased access to a broad range of potential investors who have no relationship with the bank and/or other financial institutions. Deposits can be raised over the internet through certificates of deposit listing services or through other advertising methods.

Deposit brokers provide intermediary services for financial institutions and investors.

### **7.8 OTHERS**

These include dormant and closed accounts

#### **7.8.1 DORMANT ACCOUNTS**

Where accounts have been inactive and classified dormant, the aggregates number and value at the end of each month for each branch should be reported.

#### **7.8.2 CLOSED ACCOUNTS**

The number and total value of accounts closed during the month should be stated.

### **7.9 CAPITAL MARKET OPERATION**

This involves margin loans, underwriting activities, private placement and other capital market operations.

### **7.10 LOANS AND ADVANCES**

The total number and value of loans and advances granted by the branches within the period concerned should be aggregated and reported. This should include credit card facilities.

### **7.11 CASH SECURED LOANS**

A cash-secured loan is one that has a cash reserve/deposit balances as backing. For example, a bank consumer may be qualified for a cash-secured loan if he or she has already existing savings or

money market account with the said bank. The total number and naira value of such activities within the concerned period should be indicated. Note that this should also include secured credit cards.

### **7.12 AUTOMATED CLEARING HOUSE (ACH) PAYMENT SYSTEM**

ACH system has been used for the direct deposit of payroll and government benefit payments and for the direct payment of mortgages and loans. The ACH has been expanding to include one-time debits and cheque conversion. ACH transactions are payment instructions to either credit or debit a deposit account. Examples of credit payment transactions include payroll direct deposit, social security, dividends and interest payments. Examples of debit transactions include mortgage, loan, insurance premium and a variety of other consumer payments initiated through merchants or businesses.

Merchants use the information on the cheque to initiate a type of electronic funds transfer known as an ACH debit to the cheque writer's account. The cheque is used to obtain the bank routing number, account number, cheque serial number and currency amount for the transaction. The cheque itself is not sent through the cheque collection system in any form as a payment instrument. Merchants use electronic cheque conversion because it can be a more efficient way for them to obtain payment than collecting the cheque.

RTGS is a central clearing facility for transmitting and receiving ACH payments and SWIFT/Interswitch which sends cross-border ACH credits and debit payments to some countries around the world.

### **7.13 THIRD PARTY PAYMENT PROCESSOR**

Non-bank or third-party payment processors (processors) are bank or other financial institutions customers that provide payment-processing services to merchants and other business entities. Traditionally, processors primarily contract with retailers that have physical locations in order to process the retailers' transactions.

These merchant transactions primarily included credit card payments but also covered automated clearing house (ACH) transactions, **Remotely Created Cheques (RCCs)**, debit and prepaid cards transactions. With the expansion of the internet, retail borders have been eliminated. Processors now provide services to a variety of merchant accounts, including conventional retail and internet-based establishments, prepaid travel, telemarketers and internet gaming enterprises.

Third-party payment processors often use their commercial bank accounts to conduct payment processing for their merchant clients. For example, the processor may deposit into its account RCCs generated on behalf of a merchant client, or act as a third-party sender of ACH transactions. In either

case, the financial institution does not have a direct relationship with the merchant. The increased use by processor customers, particularly telemarketers of RCCs also raises the risk of fraudulent payments being processed through the processor's bank account.

#### **7.14 PURCHASE AND SALE OF LOCAL MONETARY INSTRUMENTS**

Monetary instruments are products provided by financial institutions and include cashier's cheques, traveller's cheques and money orders. Monetary instruments are typically purchased to pay for commercial or personal transactions and, in the case of traveller's cheques, as a form of stored value for future purchases.

#### **7.15 PURCHASE AND SALE OF FOREIGN CURRENCY DRAFTS**

Drafts denominated in foreign currency may be drawn on financial institutions in Nigeria. Where such services are rendered by a financial institution, the total number and value transacted within the period under consideration should be reported.

#### **7.16 WIRE TRANSFERS**

These methods of electronic fund transfer where the originator and beneficiary institutions are located in different jurisdictions are usually done in foreign currency.

#### **7.17 PERSONAL HOME REMITTANCES**

This could be in the form of transfer of money by a foreign worker to his or her home country or local transfers using licensed agents.

#### **7.18 NON-RESIDENT NIGERIAN ACCOUNTS**

These are accounts operated by Nigerians that are not resident within Nigeria. The number of such accounts and amount should be indicated.

#### **7.19 FOREIGN INDIVIDUALS ACCOUNTS**

Foreign individuals maintaining relationships with Nigerian financial institutions are separated into two categories of **resident aliens** and **non-resident aliens**.

##### **7.19.1 RESIDENT ALIENS**

Foreign individuals who have temporary or permanent residence in Nigeria may be called a **resident alien**.

### **7.19.2 NON-RESIDENT ALIENS (NRAs)**

NRA are non-Nigerian citizens who: (i) are not lawful permanent resident of Nigeria during the calendar year and who do not meet the substantial presence test or (ii) have not been issued alien registration permits.

Although NRAs are not permanent residents, they may have legitimate needs to establish account relationships with a Nigerian financial institution. NRAs can use bank products and services for asset preservation (e.g., mitigating losses due to exchange rates), business expansion and investments.

### **7.20 EMBASSY & FOREIGN CONSULATE ACCOUNTS**

Embassy accounts, including those accounts for a specific embassy office such as a cultural or education ministry, a defence attaché or ministry, or any such account should have a specific operating purpose, stating the official function of the foreign government office. Consistent with established practices for business relationships, these embassy accounts should have written authorization by the foreign government. See details in AML/CFT Framework, 2011.

### **7.21 PRIVATE BANKING SERVICE**

A private banking account means an account (or any combination of accounts) maintained at a financial institution covered by the regulation that requires a minimum aggregate deposit of funds or other assets of not less than United States \$50,000 or its equivalent.

### **7.22 CORRESPONDENT BANKING**

This is the provision of banking services by one bank (the correspondent bank) to another bank (the respondent bank). Large international banks typically act as correspondents for thousands of other banks around the world. In Nigeria, banks sometimes act as correspondent banks to other financial institutions such as primary mortgage institutions e. t. c. Respondent banks may be provided with a wide range of services, including cash management (e.g. interest-bearing accounts in a variety of currencies), international wire transfer of funds, cheque clearing, payable-through-accounts and foreign exchange services.

### **7.23 PAYABLE THROUGH ACCOUNTS (PTA)**

A foreign financial institution may request for a PTA for its customers that want to conduct banking transactions in Nigeria through its account held at the Nigerian financial institution. The foreign financial institution provides its customers, commonly referred to as "sub account holders," with cheques that allow them to draw funds from the foreign financial institution's account held in Nigerian financial institution. The sub account holders, ( which may number several hundred or in the thousands for one PTA) are made to become signatories on the foreign financial institution's account

in the Nigerian financial institution. While payable through customers are able to write cheques and make deposits at a financial institution in Nigeria like any other account holder, they might not be directly subject to the financial institution's account opening requirements in Nigeria.

#### **7.24 BULK SHIPMENT OF CURRENCY (FIs/CUSTOMER)**

Bulk shipments of currency entail the use of common, independent, or postal service's air/land/sea carriers to transport large volumes of bank notes (Nigeria or foreign) from sources either inside or outside Nigeria on behalf of a bank in Nigeria. Often, but not always, shipments take the form of containerized cargo.

Shippers may be “**currency originators**” i.e., individuals or businesses that generate currency from cash sales of commodities or other products or services (including monetary instruments or exchanges of currency).

Shippers also may be “**intermediaries**” that ship currency gathered from their customers who are currency originators. Intermediaries may also ship currency gathered from other intermediaries. Intermediaries may be other financial institutions, central banks, non-deposit financial institutions or agents of these entities.

Financial institutions receive bulk shipments of currency directly when they take possession of an actual shipment. Financial institutions receive bulk shipments of currency indirectly when they take possession of the economic equivalent of a currency shipment, such as through a cash letter notification.

#### **7.25 NON-DEPOSIT INVESTMENT PRODUCTS (NDIP)**

NDIP includes a wide array of investment products such as securities, bonds and fixed or variable annuities. Such programs may also include cash management sweep accounts to retail and commercial clients. These programs are offered by the bank directly. Banks and other financial institutions offer these investments to increase fee income and provide customers with additional products and services. The manner in which the NDIP relationship is structured and the methods with which the products are offered substantially affect the bank's/other financial institution's ML/FT risks and responsibilities.

#### **7.26 PARALLEL BANKING**

When at least one Nigerian financial institution and one foreign financial institution are controlled either directly or indirectly by the same person or group of persons who are closely associated in their business dealings or otherwise acting together, but are not subject to consolidated supervision by a single home country supervisor.

The foreign financial institution will be subject to different money laundering rules and regulations and a different supervisory oversight structure, both of which may be less stringent than Nigeria. The regulatory and supervisory differences heighten the ML/FT risk associated with parallel banking organizations.

## **7.27 TRADE FINANCE**

Trade finance refers to financing international trading transactions. In this financing arrangement, the bank or other financial institutions of the importer may provide or pay for the goods imported on behalf of the importer. These include all trade finance products such as commercial letters of credit, trade credit insurance, export factoring, etc.

## **7.28 TRUST AND ASSET MANAGEMENT SERVICE**

**Trust accounts are generally defined as a legal arrangement in which one party (the trustor or grantor) transfers ownership of assets to a person or bank/other financial institution (the trustee) to be held or used for the benefit of others.** These arrangements include the broad categories of court-supervised accounts (e.g., executorships and guardianships), personal trusts (e.g., living trusts, trusts established under a will, charitable trusts) and corporate trusts (e.g., bond trusteeships).

**Agency accounts are established by contract and governed by contract law.** Assets are held under the terms of the contract and legal title or ownership does not transfer to the financial institution as agent. **Agency accounts include custody, escrow, investment management and safekeeping relationships.** Agency products and services may be offered in a traditional trust department or through other financial institution departments.

## **7.29 POUCH ACTIVITIES**

Pouch activity entails the use of a carrier, courier (either independent or common) or a referral agent employed by the courier to transport currency, monetary instruments and other documents from foreign countries to financial institutions in Nigeria.

Pouches can be sent by financial institutions or individuals. Pouch services are commonly offered in conjunction with foreign correspondent banking services. Pouches can contain loan repayments, transactions for demand deposit accounts or other types of transactions.

## **8.0 NUMBER OF AML REPORTS FILED**

AML/CFT Reports filed with the Nigeria Financial Intelligence Unit (NFIU) such as **Currency Transactions Reports (CTR)s**, **Foreign currency Transaction Reports (FTR)s** and **Suspicious Transactions Reports (STR)s** should be reported.

## **9.0 OTHER REPORTS FILED**

### **9.1 FRAUD**

Statistics of fraud committed by customers and staff of each branch within the time under consideration should be reported.

### **9.2 ARMED ROBBERIES**

Statistics of armed robberies that have occurred involving the branch of the bank within the time under consideration should be reported.

### **9.3 OTHER PREDICATE OFFENCES**

Section 1.1.1 of the CBN AML/CFT Regulation 2009 (as amended) requires financial institutions to identify and report to the CBN and NFIU the proceeds of crimes derived from participation in an organized criminal group and racketeering; terrorism, including terrorist financing; trafficking in human beings and migrant smuggling; fraud; counterfeiting and piracy of products; murder, grievous bodily injury; corruption and bribery; kidnapping, illegal restraint and hostage-taking and other predicate offences as contained in section 15, Money Laundering (Prohibition) Act, 2011.

## **10.0 DEALINGS WITH RELATED PERSONS/SUBSIDIARIES**

These can be categorized into local and foreign. Where the financial institution has had dealings with related persons or any of its subsidiaries, the total number and value for the period concerned should be reported.

## **11.0 ANTI-MONEY LAUNDERING/COMBATING FINANCING OF TERRORISM (AML/CFT) PENALTIES IMPOSED**

Financial institutions that contravene AML/CFT laws and regulations (whether in Nigeria or abroad) and are penalized or fined are required to report same accordingly.

## FORM 002

### CONTROL FUNCTION ASSESSMENT QUESTIONNAIRE – MONTHLY RETURNS

#### 1. CORPORATE GOVERNANCE (CG) AND ROLE OF BOARD

CG refers to a set of policies, practices and internal processes that establish a system to control direct and manage the operations of your financial institution to ensure that ML/FT risks are minimized.

##### QUESTIONS:

- I. Does your board provide a **set of policies, practices and internal processes** that establish a system for controlling, directing and managing the operations of your institution to minimize ML/FT risks?

Yes [ ] or No [ ]

- II. Does your board provide a **code of ethics or conduct for staff** that focuses on ML/FT legal compliance with respect to the prevention, detection and reporting of AML/CFT in your institution?

Yes [ ] or No [ ]

- III. Does your board/top management **exercise oversight function** on the operations of your institution and ensure a transparent system of accountability?

Yes [ ] or No [ ]

#### 2. RISK MANAGEMENT

Risk management is a framework to identify measure, assess, prioritize and control/minimize ML/FT risks to lower the probability of ML/FT occurring in your financial institution.

##### QUESTIONS:

- IV. Does your institution have a **board-approved** Enterprise Risk Management Framework (ERM) that captures ML/FT risks in place?

Yes [ ] or No [ ]

V. Does your ERM include **measures to identify, measure, assess, prioritize and control/minimize ML/FT risks** to lower the probability of ML/FT occurring in your institution?

Yes [ ] or No [ ]

VI. Does your ERM provide measures to **identify the ML/FT risk inherent in your institution's main products and business lines, customers, and processes and reasonable steps to measure and control such risks?**

Yes [ ] or No [ ]

VII. Does the approved framework have a **risk assessment process** in place that risk-profile new products, services or entry into new markets/locations?

Yes [ ] or No [ ]

### **3. POLICIES AND PROCEDURES**

These refer to ML/FT policies and procedures that address compliance with AML/CFT legislation and regulations.

#### **QUESTIONS:**

VIII. Does your institution have adequate **board-approved AML/CFT policies and procedures** with respect to customer acceptance and customer due diligence at take on?

Yes [ ] or No [ ]

IX. Does your institution (on regular basis), monitor customer transactions and activities with the aim of identifying ML/FT risks?

Yes [ ] or No [ ]

X. What is the frequency of such monitoring?

Daily [ ] Weekly [ ] or Monthly [ ] (tick appropriately)

XI. Does your institution analyze and report unusual and suspicious activities to NFIU within 7 days that the transaction takes place?

Yes [ ] or No [ ]

XII. Does your institution have in place **AML/CFT policies** that support the implementation of corporate governance and risk management framework?

Yes [ ] or No [ ]

#### 4. INTERNAL CONTROLS

XIII. At the Macro level (Organizational level), internal controls refer to AML/CFT systems such as internal and external audit, compliance and management information systems.

XIV. At the Micro level (business line level), internal controls refer to systems designed to minimize ML/FT risk in the various business activities, customers, etc of your financial institution.

#### QUESTIONS:

XV. Does your institution have in place a sound management information system?

Yes [ ] or No [ ]

XVI. Is your institution's internal control systems **risk-based and adequate** in addressing all the AML/CFT risk issues?

Yes [ ] or No [ ]

XVII. Does the internal audit have an **AML/CFT audit plan and audit programme** and generate **AML/CFT audit reports**?

Yes [ ] or NO [ ]

XVIII. Does your institution's audit plan cover all areas of ML/FT risks activities?

Yes [ ] or NO [ ]

XIX. Do the control staffs have the right professional qualifications, experience and competence?

YES [ ] or No [ ]

## **5. COMPLIANCE**

**This involves your compliance with ML/FT laws and regulations as well as compliance with internal policies and controls put in place in your financial institution.**

### **QUESTIONS:**

- Is AML/CFT compliance embedded in all significant business lines and processes of your institution?

Yes [ ] or No [ ]

- Is your board committed to ensuring sound corporate governance and implementation of your ML/FT risk management framework?

Yes [ ] or No [ ]

- Does your board ensure that staff have appropriate AML/CFT training and information?

Yes [ ] or No [ ]

- Do your board members participate in AML/CFT trainings?

Yes [ ] or No [ ]

- Is there a system of detection and measurement of non-compliance with AML/CFT issues in your institution?

Yes [ ] or No [ ]

- How many times has your institution been penalized for non-compliance with AML/CFT directives between the last reporting date and the current reporting date?

Nil [ ] Once [ ] Twice [ ] Thrice [ ] More than Thrice [ ] (Tick one, please)

## **6. REPORTING**

This entails compliance with reporting requirements set forth under the existing AML/CFT legal and regulatory framework on **CTRs, PEPs, FEPs, STRs etc.**

**QUESTION:**

- Does your institution have an **AML/CFT solution** in place to generate the various statutory and regulatory reports?

Yes [ ] or No [ ]

- Are your institution's systems for reporting these (whether automated or manual) and other reports **adequate**?

Yes [ ] or No [ ]

## 7. TRAINING

This refers to the general or specific/specialized AML/CFT training given to staff of your institution.

**QUESTIONS:**

- Does your institution give enhanced training to staff in its significant and higher risk areas of business e.g. wire transfers and NGO clients?

Yes [ ] or No [ ]

- What is the frequency of such trainings?

Quarterly [ ] Half-yearly [ ] Yearly [ ] (tick as appropriate)

- Does your institution have an **AML/CFT training budget**?

Yes [ ] or No [ ]

- What is the percentage of implementation?

Less than 30% [ ] Not more than 50% [ ] above 50% [ ] (Tick one, please)

- Does your institution give specialized training to staff in AML/CFT Units?

Yes [ ] or No [ ]

- Does your institution give specialized training to your Chief Compliance Officers?

Yes [ ] or No [ ]

- Does your institution give Senior Management and the board members AML/CFT training?

Yes [ ] or No [ ]

FORM 003

## MONTHLY RETURNS ON POLITICALLY EXPOSED PERSONS

[SECTION 1.10.3 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION:

REPORT REFERENCE NUMBER:

DATE OF THE REPORT:

**WITHIN THE MONTH REPORTED:**

## FORM 003

### EXPLANATORY NOTE

#### MONTHLY RETURNS ON POLITICALLY EXPOSED PERSONS

##### [SECTION 1.10.3 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- The term “politically exposed persons” includes individuals who are or have been entrusted with prominent public functions in Nigeria and/or foreign countries and people/entities associated with them [see **Section 1.10.1** of CBN AML/CFT Regulation, 2009 (as amended)]
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Report Reference Number:** Report reference number should be the combination of the reporting entity’s existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS Code/PEP/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the form of: DD/MM/YYYY
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Branch:** The financial institution’s branch where the account is domiciled.
  - ❖ **Account Name:** The name in which the account was opened and operated. Where the subject of the return is a corporate entity, it should be stated as such.
  - ❖ **Account Number:** The account number of the PEP’s account.
  - ❖ **PEP Status:** The past or present position held by PEP that falls within the definition of PEP in the CBN AML/CFT Regulation, 2009 (as amended) should be specifically stated e.g. present or former Minister of Mines and Power etc.
  - ❖ **Name of the PEP:** The full names of natural person that is the PEP
  - ❖ **Relationship with PEP:** The type of relationship with PEP should be stated e.g. Son, Wife, Trustees, Nominees, Solicitor or Director in the company etc.

- ❖ **Nature of Business:** The known business of the customer. For **Natural Person**, the known source of funds and for **Legal Person** the known line of business.
- ❖ **Total Credit Transaction (=N=):** The total credit Naira transactions conducted by the PEP on the account(s) should be consolidated and reported.
- ❖ **Total Debit Transaction (=N=):** The total debit Naira transactions conducted by the PEP on the account(s) should be consolidated and reported.
- ❖ **Total Credit Foreign Currency Transaction (\$):** The total credit foreign transactions conducted by the PEP on the account(s) should be converted to US \$ at the prevailing rate as at the end of the reporting month, then consolidated and reported.
- ❖ **Total Debit Foreign Currency Transaction (\$):** The total debit foreign transactions conducted by the PEP on the account(s) should be converted to US \$ at the prevailing rate as at the end of the reporting month, consolidated and reported.
- ❖ **Other Account Number(s) Involved in The Transaction Reported (if any):** All the accounts that witnessed transactions within the reporting period should be listed.
- ❖ **Remarks:** Any additional information on the transactions that could provide better appreciation/understanding of the subject reported on in this format.

## ANNUAL RETURNS ON EMPLOYEE AML/CFT TRAINING

[SECTION 1.18.6.1.3 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION: \_\_\_\_\_

REPORT REFERENCE NUMBER: \_\_\_\_\_

YEAR OF THE PROPOSED BUDGET: \_\_\_\_\_

DATE OF THE REPORT: \_\_\_\_\_

S/N	PROPOSED COURSE TITLE	PROPOSED COURSE OUTLINE	PROPOSED PERIOD TO HOLD THE COURSE	PROPOSED DURATION	CATEGORY/TYPE OF TRAINING			BUDGET
					BASIC	INTERMEDIARY	ADVANCED	CURRENT YEAR =N=



## FORM 004

### EXPLANATORY NOTE

#### ANNUAL RETURNS ON EMPLOYEE AML/CFT TRAINNING

[SECTION 1.18.6.1.3 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- 1) See section 9 of MLPA, 2011 and section 1.18.6.1 of CBN AML/CFT Regulation.
    - Section 1.18.6.1.1 requires FIs to design comprehensive employee education and training programs for the effective discharge of their AML/CFT tasks.
    - Section 1.18.6.1.3 specifically requires FIs to submit their Annual AML/CFT Employee training program for the next year to CBN and NFIU not later than the 31<sup>st</sup> December every financial year.
- ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
- ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS Code/TRG/JAN/2012.
- ❖ **Date of the Report:** State the date that the report is prepared in the format of: DD/MM/YYYY
- ❖ **Proposed Course Title(s):** The proposed course title(s) should be indicated here.
- ❖ **Proposed Course Outline:** Brief description of the course contents and time frame.
- ❖ **Proposed Period:** Date range or quarter of the year in which the training will take place.
- ❖ **Proposed Duration:** State the period a particular training will take place. The number of days the training is likely to take.

- ❖ **Course Category:** AML/CFT training is categorized as basic, intermediate or advanced.
- ❖ **Budget:** The proposed employee AML/CFT training budget for the year.
- ❖ **Names of Trainers:** Names of the trainers and their qualifications/experience should be provided.
- ❖ **Functions of Participants:** The roles of the participants should be stated, e.g, Board, Top Management, CCO, CO and Others.
- ❖ **Mode of Training:** The method of training adopted could be physical presence, web-based, etc.
- ❖ **Proposed Number of Participants:** Proposed number of staff to be trained for the year.
- ❖ **Location/Branches of the Participants:** Provide the branch location where the staff to be trained serves/works.
- ❖ **Proposed Venue:** This is where the training is to be conducted.
- ❖ **Remarks:** Provide comment that will assist in the appraisal of the returns rendered.

FORM 005

## QUARTERLY RETURNS ON EMPLOYEE AML/CFT TRAINING

[SECTION 1.18.6.1.2 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION: \_\_\_\_\_

REPORT REFERENCE NUMBER: \_\_\_\_\_

DATE OF THE REPORT: \_\_\_\_\_



## FORM 005

### EXPLANATORY NOTE

#### QUARTERLY RETURNS ON EMPLOYEE AML/CFT TRAINNING

##### [SECTION 1.18.6.1.2 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- Section 1.18.6.1.2 specifically requires FIs to render quarterly returns on level of compliance with its annual AML/CFT Employee training program with CBN and NFIU.
  - Quarterly returns should be done latest end of 2<sup>nd</sup> week of the new quarter.
- ❖ **Name of Reporting Institution:** Full name of the reporting institution should be provided.
- ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting institution's existing e-FASS code allocated to it by the CBN/ type of report/ the period covered/ year e.g. e-FASS Code/TRG/Q1/2012.
- ❖ **Date of the Report:** State the date that the report is prepared in the format of: DD/MM/YYYY.
- ❖ **Training Period:** The Period the training was conducted should be stated such as DD/MM/YYYY – DD/MM/YYYY.
- ❖ **Course Title:** Title of the course should be indicated here.
- ❖ **Venue of Training:** This is where the training was conducted.
- ❖ **Course Outline:** Brief description of the course content and time frame.
- ❖ **Name(s) of Trainers:** Names of the trainers and their qualifications/ experience should be provided.
- ❖ **Category/ Type of Training:** AML/CFT training is categorized as Basic, Intermediate or Advanced.
- ❖ **Mode of Training:** The method of training adopted could be physical presence, web-based etc.
- ❖ **Number of Participants:** This is the total number of staff that participated in the training.
- ❖ **Designation/Function of Participants:** The roles of the participants should be stated, e.g, Board, Top Management, CCO, CO and Others.

- ❖ **Location/Branches of Participants:** This is the branch location where the staff trained serves/works.
- ❖ **Amount Budgeted for the Quarter:** The proposed employee AML/CFT training budget for the quarter.
- ❖ **Actual Amount Expended:** The total actual amount expended from the proposed annual budget.
- ❖ **Remarks:** Any comment that will add value to and assist the understanding of the returns.

FORM 006

**SEMI-ANNUAL RETURNS ON MONITORING OF EMPLOYEES' CONDUCT**

[SECTION 1.18.7.1 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION: \_\_\_\_\_

REPORT REFERENCE NUMBER: \_\_\_\_\_

DATE OF THE REPORT: \_\_\_\_\_

S/N	EMPLOYEE'S NAME	EMPLOYEE'S STATUS	ACCOUNT NUMBER(S)	BRANCH	EMPLOYEE'S HOME ADDRESS		AMOUNT INVOLVED =N=	\$'000	RELATED ACCOUNT NUMBER (S)	SUSPICIOUS CONDUCT	REMARKS

**FORM 006**

**EXPLANATORY NOTE**

**SEMI-ANNUAL RETURNS ON MONITORING OF EMPLOYEE'S CONDUCT**

**[SECTION 1.18.7.1 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]**

- For potential signs of ML, FIs are required to monitor their employees' conduct and accounts (Know Your Employee-KYE) as well as customers' accounts. This is to be done under the supervision of the CCO and compliance reports including findings are to be rendered to the CBN and NFIU.
- Reports should be rendered at the end of June and December every year.
  - ❖ **Name of Reporting Institution:** Full name of the reporting institution should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the form of: DD/MM/YYYY.
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Employee's Name:** The full names of the employee should be provided in the format of: Surname, First Name, and Middle Name.
  - ❖ **Employees' Status:** State the status of the employee as at the time of the report.
  - ❖ **Account Number(s):** The account number(s) of the employee involved in the transactions.

- ❖ **Branch:** The branch where the employee works as at the time of the observed misconduct.
- ❖ **Employee's Home Address:** State the known permanent address of the employee.
- ❖ **Amount:** State the total amount involved in the suspicion.
- ❖ **Related Account Numbers:** Give the account numbers that the employee is related to by way of transaction, human relationship, etc.
- ❖ **Suspicious Conduct:** Indicate the observed suspicious conduct i.e. theft, suppression of cheques, transfer of funds into the staff account, connivance with third parties, etc.
- ❖ **Remarks:** Give detail activities of staff that elicited the suspicion.

FORM 007

## QUARTERLY RETURNS ON ADDITIONAL AREAS OF AML/CFT RISKS [SECTION 1.19.1 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION: \_\_\_\_\_

REPORT REFERENCE NUMBER: \_\_\_\_\_

DATE OF THE REPORT: \_\_\_\_\_

## FORM 007

### EXPLANATORY NOTE

#### QUARTERLY RETURNS ON ADDITIONAL AREAS OF AML/CFT RISKS

##### [SECTION 1.19.1 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- FIs are required to REVIEW, IDENTIFY and RECORD other areas of potential ML risks not covered by AML/CFT Regulation 2009 (as amended) and report same QUARTERLY to CBN and NFIU.
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the format of: DD/MM/YYYY
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Identified Additional Potential Risks:** These are additional areas of potential money laundering risks not covered by the **AML/CFT Regulation**.
  - ❖ **Review/Additional Procedures:** Review the additional procedures in place to determine the effectiveness.
  - ❖ **Mitigating Factors:** Indicate factors that pose hindrance to effective additional procedures in place.

FORM 008

## ANNUAL RETURNS ON ADDITIONAL PROCEDURES AND MITIGANTS

[SECTION 1.20 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION:

REPORT REFERENCE NUMBER:

**DATE OF THE REPORT:** \_\_\_\_\_

## FORM 008

### EXPLANATORY NOTE

#### ANNUAL RETURNS ON ADDITIONAL PROCEDURES AND MITIGANTS

[SECTION 1.20 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- Where the FIs have reviewed their AML/CFT Frameworks and identified new areas of potential ML risks, they are required to DESIGN and adopt ADDITIONAL PROCEDURES AND MITIGANTS AS CONTINGENCY PLAN in their AML/CFT Operational Manual.
- Details of Contingency plan are to be rendered to CBN and NFIU as at 31<sup>st</sup> December every financial year.
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the format of: DD/MM/YYYY.
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Identified Additional Risks:** State the type of additional risks identified.
  - ❖ **Service or Product Area:** State the type of service or product where additional risks have being identified.
  - ❖ **Assessment of Risk:** This is the level or extent of additional risk identified i.e High, Medium, or Low.
  - ❖ **Mitigants/Control:** State the measures put in place to control identified additional risks.
  - ❖ **Assessment of Preventive/Detective Control Measures:** Assess or comments on the effectiveness of measures put in place to control identified additional risks.

FORM 009

## ANNUAL RETURNS ON TESTING FOR THE ADEQUACY OF AML/CFT COMPLIANCE

[SECTION 1.21 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

**NAME OF REPORTING INSTITUTION:**

REPORT REFERENCE NUMBER: \_\_\_\_\_

**DATE OF THE REPORT:**

## FORM 009

### EXPLANATORY NOTE

#### ANNUAL RETURNS ON TESTING FOR THE ADEQUACY OF AML/CFT COMPLIANCE

[SECTION 1.20 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

Every FI is required to make a policy commitment and to subject its AML/CFT Compliance Program to independent testing or require its internal audit function to determine its adequacy, completeness and effectiveness.

- This should be rendered to CBN and NFIU every financial year as at 31<sup>st</sup> December.
- Any identified weakness or inadequacies should be promptly addressed by the FIs.
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the form of:  
DD/MM/YYYY.
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Policy commitment for AML/CFT Program Independent Testing:** Indicate policy commitment for AML/CFT program by providing documentary evidence.
  - ❖ **Test Conducted by:** State the name of the person or the organization that conducted the test.
  - ❖ **Outcome:** State if the test conducted is adequate, complete and effective.
  - ❖ **Measures Put in place to Address them:** Indicate the type of measures put in place to address the identified gap in policy commitment.
  - ❖ **Remarks:** The report should capture basic items of AML/CFT Laws and Regulations.

**FORM 010****QUARTERLY RETURNS ON MONEY OR VALUE TRANSFER SERVICES**

[SECTION 1.25.2 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION: \_\_\_\_\_

REPORT REFERENCE NUMBER: \_\_\_\_\_

DATE OF THE REPORT: \_\_\_\_\_

S/N.	NAME OF AGENTS/CORRESPONDENT OPERATOR	ADDRESS	DATE OF ENGAGEMENT	CURRENT LIST OF AGENTS	COMMENTS ON ADEQUACY OF AML/CFT CONTROLS OF AGENTS	NUMBER OF NEW CORRESPONDENTS APPROVAL OBTAINED FROM CBN

## **FORM 010**

### **EXPLANATORY NOTE**

#### **QUARTERLY RETURNS ON MONEY OR VALUE TRANSFER SERVICES**

##### **[SECTION 1.25.2 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]**

- **Section 1.25.2** of requires all MVT Service Operators to maintain a current list of their agents and render quarterly returns to the CBN.
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the form of:  
DD/MM/YYYY.
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Name of Agents/Correspondent Operator:** The full name(s) of the agents/ operators should be stated.
  - ❖ **Address:** State the Address of the Agent/Operators.
  - ❖ **Date of Engagement:** State the date of engagement of the Agents/Correspondent Operator.
  - ❖ **Current List of Agents:** List the names of the Agents.
  - ❖ **Comments on Adequacy of AML/CFT Controls of Agents:** A brief comment on the effectiveness of controls on Agents/Operators.
  - ❖ **Number of New Correspondent Relationship:** State the total numbers here.
  - ❖ **Number of New Correspondents Approval Obtained from CBN:** Indicate the total number of approved Correspondents.

QUARTERLY RETURNS ON FINANCIALLY EXCLUDED PERSONS

[SECTION 2.6.1.5.9, 2.6.1.5.12 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

NAME OF REPORTING INSTITUTION:

**REPORT REFERENCE NUMBER:**

**DATE OF THE REPORT:**

## FORM 011

### EXPLANATORY NOTE

#### QUARTERLY RETURNS ON FINANCIALLY EXCLUDED PERSONS

[SECTION 2.6.1.5.9, 2.6.1.5.12 CBN AML/CFT REGULATION, 2009 (AS AMENDED)]

- Section 2.6.1.5.9 requires that when FI has decided to treat a client as “financially excluded”, it should record the reasons for doing so along with the account opening documents and returns on such should be rendered to CBN and NFIU quarterly.
  - ❖ **Name of Reporting Entity:** Full name of the reporting entity should be provided.
  - ❖ **Returns Reference Number:** Report reference number should be the combination of the reporting entity's existing e-FASS code allocated to them by the CBN/ type of report/ the period covered/ year e.g. e-FASS /SAR/JAN/2012.
  - ❖ **Date of the Report:** State the date that the report is prepared in the following form of: DD/MM/YYYY.
  - ❖ **Serial Number:** All consolidated reports should be serially numbered.
  - ❖ **Branch:** The branch where the report is being prepared.
  - ❖ **Number of Accounts Opened:** The number(s) of accounts opened in that branch.
  - ❖ **Balances in the Accounts:** The balance standing in the account as at the period of report.
  - ❖ **Reasons for Financial Exclusion:** State the reason(s) why the Customer is considered financially excluded.
  - ❖ **Alternate Means of Identification:** State the type of means of identification used in opening the account.