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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Standard Chartered Bank – Group Client Due Diligence (CDD) Procedures  ***Singapore* Country Addendum and Supporting Information**   |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | | *Please tick applicable segments in the country* | | | | | | | | | | CIB | | CB | | | | RB | | PvB | | Financial Institutions | International Corporate | Local Corporate | Middle Market | Medium Enterprise | High-Value Small Business | Business Banking | Individual Clients | | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |  |  |  | | --- | --- | | **CA Version No** | *1.0* | | **CA Status** | *Approved* | | **CA Effective Date** | **PvB:** 9 December 2017  **Other Business Segments:** Upon Group CDD Procedures version 4.1 go-live in the respective segments | | **CA Owner (CMLCO)** | *Rosalind Lazar*  *Head, FCC (Singapore)* | | **CA Inquiry Contact** | *Rosalind Lazar*  *Head, FCC (Singapore)* | | **Version of Baseline CDD Procedures** | *Group CDD Procedure version 4.1* |   **NOTE: CMLCO IS RESPONSIBLE TO ENSURE THE COMPLETENESS AND CORRECTNESS OF THIS DOCUMENT IN ACCORDANCE WITH THE GROUP CDD PROCEDURES.** |

**Introduction**

The document is a tool for submission, review and approval of Country Addendum and supporting information against the Group CDD Procedures[[1]](#footnote-1). It consists of 5 parts:

1. **Part A: Country-specific deviations of Less Stringent Requirement** than the Group CDD Procedures; and their **supporting information**.
2. **Part B: Country-specific deviations of More Stringent Requirement** than the Group CDD Procedures; and their **supporting information.**
3. **Part C: Additional local requirements** that are not considered as deviations to the Group CDD procedures as they are neither more stringent nor less stringent requirements comparing to the Group CDD procedures.
4. **Part D: Approval of Country Addendum**
5. **Part E: Version control / Change log**

Detailed instructions are included in the forms of respective sections

**Applicability of Country Requirements across Client Segments**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **PART A** | **CIB** | **CB** | **RB** | **PvB** | **Trust** |
| **NA** | | | | | |
| **PART B** | **CIB** | **CB** | **RB** | **PvB** | **Trust** |
| B-001 | ✓ | ✓ | ✓ | N/A | N/A |
| B-002 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-003 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-004 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-005 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-006 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-007 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-008 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-009 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-010 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-011 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-012 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-013 | ✓ | ✓ | N/A | N/A | N/A |
| B-014 | ✓ | ✓ | ✓ | N/A | N/A |
| B-015 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-016 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-017 | ✓ | ✓ | ✓ | N/A | N/A |
| B-018 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-019 | ✓ | ✓ | ✓ | ✓ | ✓ |
| B-020 | N/A | N/A | N/A | ✓ | ✓ |
| B-021 | ✓ | ✓ | ✓ | ✓ | ✓ |
| **PART C** | **CIB** | **CB** | **RB** | **PvB** | **Trust** |
| C-1 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-2 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-3 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-4 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-5 | N/A | N/A | ✓ | ✓ | N/A |
| C-6 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-7 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-8 | ✓ | ✓ | ✓ | ✓ | ✓ |
| C-9 | ✓ | ✓ | N/A | N/A | N/A |
| C-10 | ✓ | ✓ | N/A | N/A | N/A |

**PART A: Country-specific deviations of Less Stringent Requirements**

There are no deviations of less stringent requirements.

**PART B: Country-specific deviations of More Stringent Requirements**

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-001** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures, [9.3.2] One-off Transactions | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| The Group is not allowed to provide products or services to individuals or entities who are not Clients. However, certain CDD requirements may be exempted for One-off Transactions with individuals or entities who are not Clients in exceptional circumstances where (i) they relate to Funds Transfers below USD 1,000 (or local currency equivalent); or (ii) for all other One-off Transactions, the value of the transaction is below USD 15,000 (or local currency equivalent). For the Group to allow such transactions, the conditions listed under 9.3.2 must be fulfilled. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| SCB Singapore shall not permit any one-off transaction for any party or client who has not otherwise established business relations or opened an account with SCB Singapore. For the avoidance of doubt, this prohibition applies to both:   1. Parties who have no business relationships or accounts with any branches or subsidiaries of the SCB group, and 2. Clients who have business relationships or accounts with certain branches or subsidiaries of the SCB group but not with SCB Singapore. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is due to local regulatory requirements and Country AML Procedures.  Under para. 6.3 of MAS Notice 626, a Bank must complete CDD before carrying out the following transactions.  *A bank shall perform the measures as required by paragraphs 6, 7 and 8 when:*  *(a)* the bank establishes business relations with any customer;  (b) the bank undertakes **any transaction of a value exceeding S$20,000** **for any customer who has not otherwise established business relations with the bank;**  (c) the bank **effects or receives any funds by domestic wire transfer, or by cross-border wire transfer that exceeds S$1,500, for any customer who has not otherwise established business relations with the bank**;  (d) there is a suspicion of money laundering or terrorism financing, notwithstanding that the bank would not otherwise be required by this Notice to perform the measures as required by paragraphs 6, 7 and 8; or  (e) the bank has doubt about the veracity or adequacy of any information previously obtained.  Under para. 6.31 of MAS Notice 626:  *CDD Measures for Non-Account Holder*  [6.31] A bank that **undertakes any transaction of a value exceeding S$20,000**, or effects or receives any funds by **domestic wire transfer, or by cross-border wire transfer that exceeds S$1,500**, for any customer who does not otherwise have business relations with the bank shall:  (a) **perform CDD measures as if the customer had applied to the bank to establish business relations;** and  (b) record adequate details of the transaction so as to permit the reconstruction of the transaction, including the nature and date of the transaction, the type and amount of currency involved, the value date, and the details of the payee or beneficiary.  Under **Country AML Procedures:**  [5.2] SCB Singapore **shall not undertake a transaction for a non account-holder**. If the Business wishes to undertake such a transaction, the MAS Notice 626 CDD requirements shall be met.  [8.1] SCB Singapore **shall not effect or receive** any funds by domestic or by cross-border wire transfer for any customer **who has not otherwise established business relations or opened an account** with SCB Singapore.  Hence, SCB Singapore only effects a wire transfer for a **client**, where as part of the CDD performed at client-on-boarding, the client has been identified, his identity has been verified, and has been/will be subject to client screening by the bank.  Transactions for non-Account holders are not permitted in the PvB Segment; hence this deviation is to align the prohibition across all other business segments within SCB SG. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Country AML Procedure appended in Annexe 1 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-002** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G, ID&V Requirements, Individual- Personal/ Joint Accounts, All non-Individual clients | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
|  | Under Appendix G, for verification of individuals, the primary document to be used for identity verification is:  (a) government-issued identification document with an evidencing photograph, such as:   1. Passport 2. Driving License 3. National Identity Card 4. ID Card issued by Electoral Office     or (b) Acceptable data sources as set out in Section 5.7.5 of the Group CDD Procedures  or both (a) and (b) | | | |
|  | **Requested Country-Specific Deviation** | | | |
| **C** | Unless expressly permitted in this country addendum, only Government-issued documents with evidencing photograph and Information from MyInfo, a Singapore Government initiated repository are acceptable for verification of Individual Clients, Authorised Representatives and Account Signatories of Individual Clients.  For SCT Singapore, only Government-issued documents with photographs are acceptable for verification of trust relevant parties that are natural persons. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All Individual Clients,  Authorised Representatives and Account Signatories of Individual Clients | RB, CB, CIB, PvB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is due to a local regulatory requirement/expectation.  Guidelines to Notice 626 at [6-6-1, 6-6-2] prescribe **that a photograph ID should be collected for verification of identity of a customer who is a natural person.**  [6-6-1] Where the customer is a **natural person,** a bank should obtain **identification documents that contain a clear photograph** of that customer.  [6-6-2] In verifying the identity of a customer, a bank may obtain the following documents:   1. Natural Persons ― 2. name, unique identification number, date of birth and nationality based on a valid passport or a national identity card that **bears a photograph** of the customer; and 3. residential address based on national identity card, recent utility or telephone bill, bank statement or correspondence from a government agency;”   Guidelines to MAS Notice TCA-N03 [6-5-2] has the same requirements for verification of identity of a trust relevant party who is a natural person.  For Authorised Representative/Account Signatory, [6.10] stipulates the same set of identification information to be obtained.   1. **Identification and Verification of Identity of Natural Person Appointed to Act on a Customer’s Behalf** 2. [6.10] Where a customer appoints one or more natural persons to act on his behalf in establishing business relations with a bank or the customer is not a natural person, the bank shall **identify each natural person who acts or is appointed to act on behalf of the customer** by obtaining at least the following information of such natural person: 3. full name, including any aliases; 4. unique identification number (such as an identity card number, birth certificate number or passport number); 5. residential address; 6. date of birth; 7. nationality; and 8. **verify the identity of each natural person using reliable, independent source data, documents or information.**   MAS Notice TCA-N03 [6.10] has the same requirements for verification of identity of natural person appointed to act on a trust relevant party’s behalf.  Further, ABS Guidelines to AML/CFT set out:  Given the different nationalities of bank customers and that not all 5 customer identification information fields required under MAS Notice 626 **may be available from a single customer identification document**, banks should require customers to provide the necessary information **using various identification documents.**  For high risk entities, SCB SG will collect the ID documents for verification of Authorized Representatives and Account Signatories. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; Guidelines to MAS Notice TCA-N03 (Trust Companies) | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-003** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G, ID&V Requirements for Clients, Authorised Representatives/Account Signatories. | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Appendix G sets out the identification and verification requirements for All individual Clients and these Related Parties of Clients   * Authorised Representatives; and * Account Signatories.   The information to be identified and verified for such related parties vary across client types and risk ratings. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Regardless of risk rating, SCB Singapore will carry out the identification and verification requirements for **All** individual Clients and these Related Parties of Clients - **All** Authorised Representatives and Account Signatories, as set out below:  Obtain   1. Full Name 2. Aliases\* (if known) 3. Unique Identification number 4. Residential address 5. Date of birth 6. All Nationalities 7. Contact Numbers   Verify   1. Full Name 2. Unique Identification number 3. Residential address 4. Date of birth 5. All Nationalities   For verification of identity of Individual Clients, the acceptable method has been set out in Deviation B-002.  For verification of identity of Authorized Representative and Account Signatories of:   |  |  | | --- | --- | | **Client Types** | **Verification of Identity of Authorized Representative and Account Signatories via** | | Individual Client | Government-issued Document with evidencing photograph or MyInfo (Deviation B-002) | | For Entity Clients | Government-issued Document with evidencing photograph or Information from MyInfo as per Deviation B-002 is preferred.    Alternatively, where there are genuine difficulties in obtaining Government-issued Documents with evidencing photograph, Business may rely on the acceptable identification documents for verification that has been set out under Group CDD procedures section 5.7.1 & Appendix G. |   On case-by-case basis SG FCC may provide exceptional approval to the above requirements.  In addition, the specimen signature of All Authorised Representatives, Account Signatories, must be obtained.  \**Alias includes not just names appearing on Government ID Documents, but includes names that the individual is commonly known as (eg. artiste name, trade name, an often used business name in correspondence and communication, or a commonly know name in the public domain) and former/previous names.*  SCT Singapore will carry out the same identification and verification for **All** Authorised Representatives and Account Signatories of the trust relevant parties (where applicable). | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
|  | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements/expectations.  MAS Notice 626 [6.5] [6.6] [6.9] and Guidelines [6-6-2] mandates that customer should be identified and verified.  When CDD is to be Performed for Identification & Verification of Customer:  [6.5] A bank shall **identify** each customer.  [6.6] For the purposes of paragraph 6.5, a bank **shall obtain** at least the following information:   1. full name, including any **aliases**; 2. unique identification number (such as an identity card number, birth certificate number or passport number, or where the customer is not a natural person, the incorporation number or business registration number); 3. the customer’s –    1. residential address; or    2. registered or business address, and if different, principal place of business,   as may be appropriate;   1. date of birth, establishment, incorporation or registration (as may be appropriate); and 2. nationality, place of incorporation or place of registration (as may be appropriate).   [6.9] A bank **shall verify the identity** of the customer using reliable, independent source data, documents or information.  Guidelines to MAS 626 under [6-6-2] further spells out the identification information for individual client and the verification method:  [6-6-1] Where the customer is a **natural person,** a bank should obtain **identification documents that contain a clear photograph** of that customer.  [6-6-2] In verifying the identity of a customer, a bank may obtain the following documents:   1. Natural Persons ― 2. name, unique identification number, date of birth and nationality based on a valid passport or a national identity card that **bears a photograph** of the customer; and 3. residential address based on national identity card, recent utility or telephone bill, bank statement or correspondence from a government agency;”   MAS Notice TCA-N03 [6.4] [6.5] [6.8] [6.9] and Guidelines [6-6-2] mandates that trust relevant party should be identified and verified.  [6.4] A trust company shall identify each trust relevant party with whom the trust company establishes business contact as follows:   1. in respect of the settlor and trustee of the trust, before the trust is constituted; provided that where the settlor has constituted the trust before establishing business contact with the trust company, the trust company shall identify the settlor and trustee of the trust before the provision of any trust business services; 2. in respect of each beneficiary of the trust, as soon as reasonably practicable after the beneficiary becomes identifiable, and in any case before making a distribution to that beneficiary or when that beneficiary intends to exercise vested rights; and 3. in respect of any other trust relevant party, as soon as reasonably practicable after the trust company first comes into business contact with that trust relevant party.   [6.5] For the purposes of paragraph 6.4, a trust company shall obtain at least the following information:   1. full name, including any aliases; 2. unique identification number (such as an identity card number, birth certificate number or passport number, or where the trust relevant party is not a natural person, the incorporation number or business registration number); 3. the trust relevant party’s    (i) residential address; or  (ii) registered or business address, and if different, principal place of business,  as may be appropriate;   1. date of birth, constitution, incorporation or registration (as may be appropriate); and 2. nationality, place of incorporation or place of registration (as may be appropriate).   [6.8] A trust company shall verify the identity of each trust relevant party with whom the trust company establishes business contact as follows    1. in respect of the settlor and trustee of the trust, before the trust is constituted; provided that where the settlor has constituted the trust before establishing business contact with the trust company, the trust company shall verify the identities of the settlor and trustee of the trust before the provision of any trust business services; 2. in respect of each beneficiary of the trust, as soon as reasonably practicable after the beneficiary becomes identifiable, and in any case before making a distribution to that beneficiary or when that beneficiary intends to exercise vested rights; and 3. in respect of any other trust relevant party, as soon as reasonably practicable after the trust company first comes into business contact with that trust relevant party.   Guidelines to MAS TCA-N03 under [6-2-2] [6-3] [6-5-2] [6-5-3(a)] further spells out the identification information for trust relevant party who is a natural person and the verification method:  [6-2-2] When relying on documents, a trust company should be aware that the best documents to use to verify the identity of the trust relevant party are those most difficult to obtain illicitly or to counterfeit. These may include **government-issued identity cards or passports,** reports from independent company registries, published or audited annual reports and other reliable sources of information. The rigour of the verification process should be commensurate with the trust relevant party’s risk profile.  **6-3 Identification of Trust Relevant Party**  [6-3-1] With respect to paragraph 6.5(c) of the Notice, a P.O. box address should only be used for jurisdictions where the residential address (e.g. street name or house number) is not applicable or available in the local context.  [6-3-2] A trust company should obtain a trust relevant party’s contact details such as personal, office or work telephone numbers.  [6-5-2] Where the trust relevant party is a natural person, a trust company should obtain identification documents that contain a clear photograph of that trust relevant party.  [6-5-3] In verifying the identity of a trust relevant party, a trust company may obtain the following documents:   * 1. Natural Persons ―      1. name, unique identification number, date of birth and nationality based on a valid passport or a national identity card that bears a photograph of the natural person; and      2. residential address based on national identity card, recent utility or telephone bill, bank statement or correspondence from a government agency;   MAS Notice 626 [6.10] prescribes the identification and verification requirements for natural persons that can act on behalf of the client.   1. **Identification and Verification of Identity of Natural Person Appointed to Act on a Customer’s Behalf**   [6.10] Where a customer appoints one or more natural persons to act on his behalf in establishing business relations with a bank or the customer is not a natural person, the bank shall   1. **identify each natural person who acts or is appointed to act on behalf of the customer** by obtaining at least the following information of such natural person: 2. full name, including any aliases; 3. unique identification number (such as an identity card number, birth certificate number or passport number); 4. residential address; 5. date of birth; 6. nationality; and 7. **verify the identity of each natural person using reliable, independent source data, documents or information.**   The Acceptable Document for verification is a Government-issued Identification Document with photograph and the rationale has been articulated in B-002. For lower risk entities Government-issued Document with evidencing photograph or Information from MyInfo is preferred. Alternatively, where there are genuine difficulties in obtaining Government-issued Documents with evidencing photograph, Business may rely on the acceptable identification documents for verification that has been set out under Group CDD procedures section 5.7.1 & Appendix G.  Additional information to be identified/verified:  SG FCC has interpreted “x. nationality” to include ALL nationalities to be identified and correspondingly verified. This is aligned with industry interpretation and practice.  [6.11] A bank shall verify the due authority of each natural person appointed to act on behalf of the customer by obtaining at least the following:   1. the appropriate documentary evidence authorising the appointment of such natural person by the customer to act on his or its behalf; and 2. **the specimen signature of such natural person appointed**.   **(III) Identification and Verification of Identity of Natural Person Appointed to Act on a Customer’s Behalf**  [6.12] Where the customer is a Singapore Government entity, the bank shall only be required to obtain such information as may be required to confirm that the customer is a Singapore Government entity as asserted.  **Guidelines to MAS Notice 626 [6-4] Identification of Customer**  [6-4-2] A bank should obtain a customer’s contact **details such as personal, office or work telephone numbers**.  **MAS Notice TCA-N03**   1. **Identification and Verification of Identity of Natural Person Appointed to Act on a Trust Relevant Party’s Behalf**   [6.10] Where a trust relevant party appoints one or more natural persons to act on his behalf in establishing business contact with a trust company or the trust relevant party is not a natural person, the trust company shall:   1. **identify each natural person who acts or is appointed to act on behalf of the trust relevant party by obtaining at least the following information of such natural person:** 2. full name, including any aliases; 3. unique identification number (such as an identity card number, birth certificate number or passport number); 4. residential address; 5. date of birth; 6. nationality; and   **(b) verify the identity of each natural person using reliable, independent source data, documents or information.**  [6.11] A trust company shall verify the due authority of each natural person appointed to act on behalf of the trust relevant party by obtaining at least the following:   1. the appropriate documentary evidence authorising the appointment of such natural person by the trust relevant party to act on his or its behalf; and 2. the specimen signature of such natural person appointed.   [6.12] Where the trust relevant party is a Singapore Government entity, the trust company shall only be required to obtain such information as may be required to confirm that the trust relevant party is a Singapore Government entity as asserted. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-004** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G, ID&V Requirements- All non-individual clients | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Appendix G sets out the identification and verification requirements for these Related Parties of non-individual clients:   * Beneficial Owner; * Business Owner of Sole Proprietorship; * Trustee; * Vested Beneficiary; * Settlor; * Protector   The information to be identified and verified for such related parties vary across client types and risk ratings. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Regardless of risk rating, SCB Singapore will always identify and verify the following information for Beneficial Owners\* of all Entity Clients (except PLC listed on a Regulated Market and their Majority-Owned Subsidiaries, Financial Institution regulated or headquartered in an Equivalent Low Risk Jurisdiction, and Government Office):  Obtain   1. Full Name 2. Aliases\*\* (if known) 3. Unique Identification number 4. Residential address, 5. Date of birth 6. All Nationalities 7. Contact Numbers   Verify   1. Full Name 2. Unique Identification number 3. Residential address 4. Date of birth 5. All Nationalities   Acceptable Documents for Verification  Government-issued Document with evidencing photograph or Information from MyInfo is preferred.  Alternatively where there are genuine difficulties in obtaining Government-issued Documents with evidencing photograph, Business may rely on the acceptable identification documents for verification that has been set out under Group CDD procedures section 5.7.1 & Appendix G.  On case-by-case basis SG FCC may provide exceptional approval to the above requirements.  For avoidance of doubts, SCB aligns to the Group Requirements for Beneficial Owners of Entity Client risk rated D & E for   * PLCs listed on a Regulated Market * Financial Institution regulated or headquartered in an Equivalent Low Risk Jurisdiction * Government Office   SCT Singapore will carry out the same identification and verification for **All** Effective Controllers in relation to a settlor or trustee (where applicable).  *\* Beneficial Owners include Business Owners of Sole Proprietorships, and Trustees, Vested Beneficiaries, Settlors, and Protectors of Trusts, Foundations and Similar Entities. It also includes all “Effective Controllers” as defined in MAS Notice TCA N03.*  *\*\*Alias includes not just names appearing on Government ID Documents, but includes names that the individual is commonly known as (eg. artiste name, trade name, an often used business name in correspondence and communication, or a commonly know name in the public domain) and former/previous names.* | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| Beneficial Owners of Entity clients (Except PLCs listed in Regulated Market, Financial Institutions Regulated or Headquartered in Equivalent Low Risk Jurisdiction, Government Office),  Business Owners of Sole Proprietorship, Trustees, Vested Beneficiaries, Settlors, Protectors of Trusts, Foundations and Similar Entities. | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements/expectations.  The MAS Notice 626, at paras. [6.13] and [6.14] provides that banks should identify the beneficial owners and verify their identities using reliable, independent sources.  [2.1] “beneficial owner”, in relation to a customer of a bank, means the **natural person who ultimately owns or controls the customer** or the natural person on whose behalf a transaction is conducted or business relations are established, and includes any person who exercises ultimate effective control over a legal person or legal arrangement.   1. **Identification and Verification of Identity of Beneficial Owner**   [6.13] Subject to paragraph 6.16, a bank shall inquire if there exists any beneficial owner in relation to a customer.  [6.14] Where there is one or more beneficial owner in relation to a customer, the bank **shall identify the beneficial owners and take reasonable measures to verify the identities of the beneficial owners using the relevant information or data obtained from reliable, independent sources**. The bank shall-   1. For customers that are legal persons-    1. Identify the natural persons (Whether acting alone or together) who ultimately own the legal person.    2. To the extent that there is doubt under subparagraph (i) as to whether the natural persons who ultimately own the legal persons are the beneficial owners or where no natural persons ultimately own the legal person, identify the natural persons (if any) who ultimately control the legal person or have ultimate effective control of the legal person; and    3. Where no natural persons are identified under subparagraph (i) or (ii), identify the natural persons having executive authority in the legal person, or in equivalent or similar positions. 2. For customers that are legal arrangements- 3. **For trusts, identify the settlers, the trustees, the protector (if any), the beneficiaries (including every beneficiary** that falls within a designated characteristic or class), and any natural person exercising ultimate ownership, ultimate control or ultimate effective control over the trust (including through a chain of control or ownership); and 4. For other types of legal arrangements, identify persons in equivalent or similar positions, as those described under subparagraph (i)   SG FCC interprets that the same identification and verification requirements for individual clients required under MAS Notice 626, to apply to the beneficial owners.  Government-issued Document with evidencing photograph or Information from MyInfo is preferred. Alternatively, where there are genuine difficulties in obtaining Government-issued Documents with evidencing photograph, Business may rely on the acceptable identification documents for verification that has been set out under Group CDD procedures section 5.7.1 & Appendix G.  **In relation to PLCs listed on Regulated Market, Financial Institutions regulated in an Equivalent Low Risk Jurisdiction, and Government Offices, MAS Notice [6.16] and Guidelines to MAS 626 [6-8-10] provides:**  [6.16] A bank shall not be required to inquire if there exists any beneficial owner in relation to a customer that is:  ….  (c) an entity listed on the Singapore Exchange;  (d) an entity listed on a stock exchange outside of Singapore that is subject to  (i) regulatory disclosure requirements; and  (ii) requirements relating to adequate transparency in respect of its beneficial owners (imposed through stock exchange rules, law or other enforceable means);  (e) a financial institution set out in Appendix 1;  (f) a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by FATF; ……..  [6-8-10] A bank is not required to inquire if there exists any beneficial owner in relation to a customer that is a Singapore Government entity or a foreign government entity unless the bank has doubts about the veracity of the CDD information, or suspects that the customer, business relations with, or transaction for the customer may be connected with ML/TF activities.  Hence SCB SG aligns to Group Standards to   * apply simplified due diligence for such low risk Clients (A to C), and * adhere to the ID&V and Identification Document requirements per Appendix G for Beneficial Owners of such Clients with D & E risk rating.   The MAS Notice TCA N03 [6.4] [6.6][6.9][6.13] [6.16] provides that a trust company should identify the trust relevant parties (and there exists, effective controller in relation to a settler or a trustee) and verify their identities using reliable, independent sources. [2.1] “effective controller”, in relation to a settlor or a trustee, means the natural person who ultimately owns or controls the settlor or trustee, or the natural person on whose behalf business contact is established or maintained, and includes any person who exercises ultimate effective control over a legal person or legal arrangement”  “trust relevant party”, in relation to a trust, means any of the following  (a) the settlor;  (b) the trustee;  (c) the beneficiaries; or  (d) any person who has any power over the disposition of any property that is subject to the trust;  [6.4] A trust company shall identify each trust relevant party with whom the trust company establishes business contact as follows:   1. in respect of the settlor and trustee of the trust, before the trust is constituted; provided that where the settlor has constituted the trust before establishing business contact with the trust company, the trust company shall identify the settlor and trustee of the trust before the provision of any trust business services; 2. in respect of each beneficiary of the trust, as soon as reasonably practicable after the beneficiary becomes identifiable, and in any case before making a distribution to that beneficiary or when that beneficiary intends to exercise vested rights; and 3. in respect of any other trust relevant party, as soon as reasonably practicable after the trust company first comes into business contact with that trust relevant party.   [6.6] Where the trust relevant party is a legal person or legal arrangement, the trust company shall, apart from identifying the trust relevant party, also identify the legal form, constitution and powers that regulate and bind the legal person or legal arrangement.  [6.9] A trust company shall verify the identity of the trust relevant party using reliable, independent source data, documents or information. Where the trust relevant party is a legal person or legal arrangement, a trust company shall verify the legal form, proof of existence, constitution and powers that regulate and bind the trust relevant party, using reliable, independent source data, documents or information.  Identification and Verification of Identity of Effective Controller  [6.13] Subject to paragraph 6.16, a trust company shall inquire if there exists any effective controller in relation to a settlor or a trustee.  [6.14] Where there is one or more effective controller in relation to a settlor or a trustee, the trust company shall identify the effective controllers and take reasonable measures to verify the identities of the effective controllers, before the trust is constituted (provided that where the settlor has constituted the trust before establishing business contact with the trust company, the trust company shall verify the identities of the effective controllers before the provision of any trust business services), using the relevant information or data obtained from reliable, independent sources. The trust company shall -   * 1. for settlors or trustees that are legal persons -   identify the natural persons (whether acting alone or together) who ultimately own the settlor or trustee;  to the extent that there is doubt under subparagraph (i) as to whether the natural persons who ultimately own the settlor or trustee are the effective controllers or where no natural persons ultimately own the settlor or trustee, identify the natural persons (if any) who ultimately control the settlor or trustee or have ultimate effective control of the settlor or trustee; and  where no natural persons are identified under subparagraph (i) or (ii), identify the natural persons having executive authority in the settlor or trustee, or in equivalent or similar positions;   * 1. for settlors or trustees that are legal arrangements -   for trusts, identify the settlors, the trustees, the protector (if any), the beneficiaries (including every beneficiary that falls within a designated characteristic or class), and any natural person exercising ultimate ownership, ultimate control or ultimate effective control over the trust (including through a chain of control or ownership); and  for other types of legal arrangements, identify persons in equivalent or similar positions, as those described under subparagraph (i).  [6.16] A trust company shall not be required to inquire if there exists any effective controller in relation to a settlor or a trustee that is -   * + - * 1. a Singapore Government entity;         2. a foreign government entity;         3. an entity listed on the Singapore Exchange;         4. an entity listed on a stock exchange outside of Singapore that is subject to    regulatory disclosure requirements; and  requirements relating to adequate transparency in respect of its effective controllers (imposed through stock exchange rules, law or other enforceable means);   * + - * 1. a financial institution set out in Appendix 1;         2. a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF; or         3. an investment vehicle where the managers are financial institutions -   set out in Appendix 1; or  incorporated or established outside Singapore but are subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF,  unless the trust company has doubts about the veracity of the CDD information, or suspects that the trust relevant party or business contact with the trust relevant party, may be connected with money laundering or terrorism financing. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-005** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G, ID&V Requirements- All non-individual clients | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Appendix G sets out the identification and verification requirements for these Related Parties of non-individual clients:   * Partners; * Directors; * Controlling Directors * Controllers   The information to be identified and verified for such related parties vary across client types and risk ratings. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| In addition to requirements under Appendix G, SCB Singapore will identify and verify the ‘Related Parties’- All Partners, Directors, Controllers and Controlling Directors of   1. **All Entity Clients across all risk ratings** (**Except** **Low Risk Clients A to C** who are PLC listed on a Regulated Market, Financial Institution in an Equivalent Low Risk Jurisdiction, Government Office, and Government-Owned Entities):   Obtain   1. Full Name 2. Aliases\* (if known); 3. Unique Identification numbers (Identity/passport numbers).   For all related parties.  Verify information for   * 2 related parties for clients with risk rating A to C. * At least 3 related parties in addition to the Group’s verification requirements on Controllers and Controlling Directors, for clients with risk rating D and E.  1. **Low Risk Clients (A to C) who are Government-Owned Entities**:   Obtain   1. Full Name 2. Aliases\* (if known).   For all related parties.  Verify information for the same number of related parties as set out under Appendix G.     1. **Low Risk Clients (A to C) who are PLC listed on a Regulated Market, Financial Institution in an Equivalent Low Risk Jurisdiction, and Government Office:**   Obtain   1. Names 2. Aliases\* (if known).   For all related parties.  Acceptable Documents for Verification  Government-issued Document with evidencing photograph or Information from MyInfo is preferred.  Alternatively, where there are genuine difficulties in obtaining Government-issued Documents with evidencing photograph, Business may rely on the acceptable identification documents for verification that has been set out under Group CDD procedures section 5.7.1 & Appendix G.  SCT Singapore will carry out the same identification and verification for **All** connected parties in relation to a trust relevant party (where applicable).  \**Alias includes not just names appearing on Government ID Documents, but includes names that the individual is commonly known as (eg. an often used business name in correspondence and communication, or a commonly known name in the public domain) and former/previous names.* | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All Partners, Directors, Controllers, and Controlling Directors of Entity Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements.  MAS Notice 626 [6.8] and Guidelines to MAS Notice 626 [6.5] and ABS Guidelines [6.5] requires connected parties to be identified &/or verified. [7.3] further provides for a risk based approach for Banks for clients under simplified due diligence. SCB SG hence will identify the information of Related Parties as required by the local regulations.  In line with industry practice, SG FCC will   * perform the addition verification of related parties on a risk based approach for All Entity Clients across all risk ratings (Except Low Risk Clients A to C who are PLC listed on a Regulated Market, Financial Institution in an Equivalent Low Risk Jurisdiction, Government Office, and Government-Owned Entities). * also at least identify the names of Related Parties of for Low Risk Clients of PLCs listed in a Regulated Market, Financial Institutions regulated in an Equivalent Low Risk Jurisdiction, Government Office and Government-Owned Entities though this may not be required under Appendix G   **MAS Notice, 626**  [6.8] Where the customer is a legal person or legal arrangement, the bank **shall identify the connected parties** of the customer, by obtaining **at least** the following information of each connected party:  (a) **full name, including any aliases; and**  **(b) unique identification number** (such as an identity card number, birth certificate number or passport number of the connected party).  **Guidance to MAS Notice 626:**  [6-5-1] Under paragraph 6 and paragraph 8 of the Notice, a bank is required **to identify and screen** all the connected parties of a customer. However, a bank may verify their identities using a risk-based approach. A bank is reminded of its obligations under the Notice to identify connected parties and remain apprised of any changes to connected parties.  [7-3] Under SCDD, **a bank may adopt a risk-based approach** in assessing whether any measures should be performed for connected parties of the customers.  **ABS Guidelines 6.5**  Banks should **identify and verify the identities of connected parties** and beneficial owners as required under MAS Notice 626. They may apply an RBA based on an assessment of the ML/TF risks in each case.  **MAS Notice TCA-N03**  The MAS Notice 626 at [6.8] and MAS Notice TCA-N03 at [6.7] prescribes the identification requirements for connected parties of the client, which is defined as:  (a) in relation to a legal person (other than a partnership), means any director or any natural person having executive authority in the legal person;  (b) in relation to a legal person that is a partnership, means any partner or manager; and  (c) in relation to a legal arrangement  [6.7] Where the trust relevant party is a legal person or legal arrangement, the trust company shall identify the connected parties of the trust relevant party, by obtaining at least the following information of each connected party:  (a) full name, including any aliases; and  (b) unique identification number (such as an identity card number, birth certificate number or passport number of the connected party).  Guidelines to MAS Notice TCA N03:  [6-4-1] Under paragraph 6 and paragraph 8 of the Notice, a trust company is required to identify and screen all the connected parties of a trust relevant party. However, a trust company may verify their identities using a risk-based approach1. A trust company is reminded of its obligations under the Notice to identify connected parties and remain apprised of any changes to connected parties.  [6-4-2] Identification of connected parties may be done using publicly available sources or databases such as company registries, annual reports or based on substantiated information provided by the trust relevant parties.  [7-3] Under SCDD, a trust company may adopt a risk-based approach in assessing whether any measures should be performed for connected parties of the trust relevant parties. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-006** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G, ID&V Requirements- All Non-individual clients | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Appendix G sets out the identification and verification requirements for non-individual clients.  Appendix G also sets out the information relating to a non-individual client that must be obtained. This does not include the contact number of the client. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| In **addition** to the identification and verification requirements set out under the Group CDD Procedures, SCB Singapore will carry out additional identification and verification requirements as set out below:   |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | Legend: |  |  |  |  |  | | Y | Required under local regulation and Appendix G of Group Procedures | | | | | |  |  |  |  |  |  | | Y | Required under local regulation but not under Appendix G of Group Procedures | | | | | | Note: Requirements from Group Procedure which are not required by local regulations are not listed here. Guidance must be sought from Group Procedures and Appendix G. | | | | | |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | | **Client Entity Type** | **ID/V** | **Full Name** | **Registered Number or other Unique Identifying Number** | **Full Registered Address or Operating Address** | **Date of Incorporation or Registration** | **Country of Incorporation or Registration** | **Contact number** | | SOLE PROPRIETORSHIPS | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | PARTNERSHIPS | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | PRIVATELY OWNED COMPANIES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | PERSONAL INVESTMENT VEHICHLES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | PUBLICLY LISTED COMPANIES ON A REGULATED MARKET | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | GOVERNMENT OFFICES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | GOVERNMENT-OWNED ENTITIES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | FINANCIAL INSTITUTIONS REGULATED OR HEADQUARTERED IN EQUIVALENT LOW RISK JURISDICTIONS | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | FINANCIAL INSTITUTIONS REGULATED IN NON-EQUIVALENT LOW RISK JURISDICTIONS (AND ARE NOT PLCs on Regulated Market) | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | TRUSTS, FOUNDATIONS AND SIMILAR ENTITIES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | SIGNIFICANT AND WELL-ESTABLISHED ENTITIES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N | | NGOS, CHARITIES AND RELIGIOUS ORGANISATIONS | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y**\*** | Y | N | | CLUBS AND SOCIETIES | ID | Y | Y | Y | Y | Y | Y | | V | Y | Y | Y | Y | Y | N |   In addition to the full registered address or full operating address, if the principal place of business is different from the registered address or operating address, the **principal place of business** must be identified and verified, regardless of entity type or risk-rating.  SCT Singapore will carry out the same identification and verification for these non-individual persons where they are the trust relevant parties. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All non-Individual Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements.  The MAS Notice 626, at paras. 6.5, 6.6 and 6.9, stipulates the identification and verification requirements for clients:  **(I) Identification of Customer**  [6.5] A bank shall identify each customer.  [6.6] For the purposes of paragraph 6.5, a bank shall obtain at least the following information:  (a) full name, **including any aliases**;  (b) unique identification number (such as an identity card number, birth certificate number or passport number, or where the customer is not a natural person, the incorporation number or business registration number);  (c) the customer’s –  (i) residential address; or  (ii) registered or business address, **and if different, principal place of business**,  as may be appropriate;  (d) date of birth, establishment, incorporation or registration (as may be appropriate); and  (e) nationality, place of incorporation or place of registration (as may be appropriate).  **(II) Verification of Identity of Customer**  [6.9] A bank **shall verify the identity** of the customer using reliable, independent source data, documents or information. Where the customer is a legal person or legal arrangement, a bank shall **verify the legal form, proof of existence, constitution and powers** that regulate and bind the customer, using reliable, independent source data, documents or information.  MAS Guidelines to Notice at [6-4-2] further require contact number to be obtained.  **MAS Guidelines to Notice:**  [6-4-2] A bank should obtain a customer’s contact details such as **personal, office or work telephone numbers.**  The MAS Notice TCA-N03 6.4, 6.5 6.8 and 6.9, at paras. 6.5, 6.6 and 6.9, stipulates the identification and verification requirements for trust relevant party:  **(I) Identification of Trust Relevant Party**  [6.4] A trust company shall identify each trust relevant party with whom the trust company establishes business contact.  [6.5] For the purposes of paragraph 6.4, a trust company shall obtain at least the following information:  (a) full name, including any aliases;  (b) unique identification number (such as an identity card number, birth certificate number or passport number, or where the trust relevant party is not a natural person, the incorporation number or business registration number);  (c) the trust relevant party’s -  (i) residential address; or  (ii) registered or business address, **and if different, principal place of business**,  as may be appropriate;  (d) date of birth, constitution, incorporation or registration (as may be appropriate); and  (e) nationality, place of incorporation or place of registration (as may be appropriate).  **(II) Verification of Identity of Trust Relevant Party**  [6.8] A trust company shall verify the identity of each trust relevant party with whom the trust company establishes business contact.  [6.9] A trust company shall verify the identity of the trust relevant party using reliable, independent source data, documents or information. Where the trust relevant party is a legal person or legal arrangement, a trust company shall verify the legal form, proof of existence, constitution and powers that regulate and bind the trust relevant party, using reliable, independent source data, documents or information.  MAS Notice TCA-N03 at [6.9] and [6.10-6.12], read together with the MAS Guidelines to Notice TCA-N03 at [6-5-3], [6-5-4]. [6-6-1], and Appendix A set out specific information that a Trust Company is required to obtain from the trust relevant party (such as its constitutional documents under certain instances) and persons which the MAS regards as being connected with the trust relevant party.  Guidelines to MAS Notice TCA-N03 [6-3-2] further require contact number to be obtained.  [6-3-2] A trust company should obtain a trust relevant party’s contact details such as **personal, office or work telephone numbers.** | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 (Trust Companies) | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-007** |
| **A** | **Group CDD Procedures – Document and Section Number** | | | |
| Group Procedures- Appendix G: ID&V Requirements for non-individual clients | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Appendix G sets out the identification and verification requirements for non-individual clients. It does not however set out the documents to be collected to evident the powers that regulate and bind the non-individual client. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Notwithstanding the Group Requirements above, for all non-individual clients in all client segments, the verification documents must provide confirmation on the name, legal form, proof of existence and constitution of the non-individual client. The acceptable documents have been set forth under Appendix G.  In addition, the following documents (or their equivalent documents) must be collected if applicable for the type of the client/trust relevant party to provide **information on the powers that regulate and bind the non-individual client**:   1. Memorandum and Articles of Association; and 2. Mandates or board resolutions authorising the opening of an account and listing appointed account signatories | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All non-Individual Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements.  MAS Notice 626 at [6.9] and [6.10 – 6.12], read together with the MAS Guidelines to Notice 626 at [6-6-2], [6-6-3], [6-7-1], and Appendix A, set out specific information that a bank is required to obtain from its client (such as its constitutional documents under certain instances) and persons which the MAS regards as being connected with those clients.  (II) Verification of Identity of Customer  6.9 A bank shall verify the identity of the customer using reliable, independent source data, documents or information. **Where the customer is a legal person or legal arrangement, a bank shall verify the legal form, proof of existence, constitution and powers that regulate and bind the customer, using reliable, independent source data, documents or information.**  [6-6-2] In verifying the identity of a customer, a bank may obtain the following documents:  (**b) Legal Persons or Legal Arrangements ―**  (i) name, legal form, proof of existence and constitution based on certificate of incorporation, certificate of good standing, partnership agreement, trust deed, constitutional document, certificate of registration or any other documentation from a reliable independent source; and  (ii) **powers that regulate and bind the legal person or arrangement based on memorandum and articles of association, and board resolution authorising the opening of an account and appointment of authorised signatories**.  [6-7] Identification and Verification of Identity of Natural Person Appointed to Act on a Customer’s Behalf  6-7-1 Appropriate documentary evidence of a customer’s appointment of a natural person to act on its behalf includes a board resolution or similar authorisation documents.  MAS Notice TCA-N03 and Guidelines to MAS Notice TCA-N03  For trust companies, similar requirements are stipulated under MAS Notice TCA-N03 [6.9] and Guidelines to MAS Notice TCA-N03 [6-5-3] [6-6-1]  [6.9] A trust company shall verify the identity of the trust relevant party using reliable, independent source data, documents or information. **Where the trust relevant party is a legal person or legal arrangement, a trust company shall verify the legal form, proof of existence, constitution and powers that regulate and bind the trust relevant party**, using reliable, independent source data, documents or information.  [6-5-3] In verifying the identity of a trust relevant party, a trust company may obtain the following documents:  **(b) Legal Persons or Legal Arrangements ―**  (i) name, legal form, proof of existence and constitution based on certificate of incorporation, certificate of good standing, partnership agreement, trust deed, constitutional document, certificate of registration or any other documentation from a reliable independent source; and  (ii) **powers that regulate and bind the legal person or arrangement based on memorandum and articles of association, and board resolution authorising the establishment of business contact and appointment of authorised signatories.**  [**6-6] Identification and Verification of Identity of Natural Person Appointed to Act on a Trust Relevant Party’s Behalf**  [6-6-1] Appropriate documentary evidence of a trust relevant party’s appointment of a natural person to act on his behalf includes a board resolution or similar authorisation documents. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626 ; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-008** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures, Appendix G- Clubs and Societies- Acceptable Documents for Verification | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| **TWO** documents are required to verify the identity of the Client:   1. certified copy of constitutional documents or equivalent of the club/ society**; AND** 2. minutes authorising the appropriate officer(s) to open and operate the account or other equivalent document. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| In addition to the documents set out in Box B above, SCB Singapore must always obtain the following documents for all Clubs and Societies:     1. Certificate of registration; and 2. Records in a relevant and independent registry in the country of establishment. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| Clubs and Societies | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This is due to a local regulatory requirement.  Appendix A to the Guidelines to MAS Notice 626/Notice TCA-N03 set out specific information and documents that a bank/trust company is required to obtain from its clients/trust relevant party that are Clubs or Societies.  Items in bold are the additional items over and above what have been prescribed under the Group Procedures.  Under Appendix A of the Guidelines to MAS Notice 626/Notice TCA-N03:  Clubs and Societies- Examples of CDD Information:   * Full name of entity * Business address or principal place of business * Information about the purpose and intended nature of business relations with the bank * Information about the nature of the entity’s activities and objectives * Names of all trustees (or equivalent) * Names of all natural persons who act on behalf of the entity * Names of all connected parties * Names of all beneficial owners * Information about the source of funds * A report of the bank’s visit to the customer’s place of business, where the bank assesses it as necessary * Ownership and control structure * Constitutional document * **Certificate of registration** * Committee/Board resolution authorising the opening of the customer’s account with the bank * **Records in a relevant and independent registry in the country of establishment** | | | |
| **Reference of Local Regulation** | | | |
| Guidelines to MAS Notice 626; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-009** |
| **A** | **Group CDD Procedures– Document and Section Number** | | | |
| Group CDD Procedures Appendix G - Trusts, Foundations and Similar Entities- Acceptable Documents for Verification | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Any **ONE** of the following documents is sufficient to verify the identity of Trusts, Foundations and Similar Entities:  (a) copy of the organizing documents, e.g. trust agreement, trust deed, foundation charter, etc; OR  (b) a declaration by the trustee regulated in a well regulated jurisdiction. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Instead of the Group requirements in Box B above, for all trust relationships, it is compulsory to collect:   1. Trust deed\*; 2. Declaration of trust (where applicable); and 3. The deed of retirement and appointment of trustees (where applicable).   *\* A Trust Deed is not compulsory for (i) Trustees based in equivalent jurisdictions, or (ii) PvB accounts of Trusts that are managed by Standard Chartered Trustee*. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| Trusts, Foundations and Similar Entities | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 3. More Stringent ID&V Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements.  Appendix A to the Guidelines to MAS Notice 626/Notice TCA-N03 sets out specific information and documents that a bank/trust company is required to obtain from its clients/trust relevant party that are Trusts and Other Arrangements. Items in bold are the additional items over and above what have been prescribed under the Group Procedures.  Trust and Other Similar Arrangements (e.g. Foundations, Fiducie, Treuhand and Fideicomiso) - Examples of CDD Information:   * Full name of entity * Business address or principal place of business * Information about the nature, purpose and objectives of the entity (e.g. discretionary, testamentary) * Names of all natural persons who act on behalf of the entity * Names of all connected parties * Names of all beneficial owners * Information about the source of funds * A report of the bank’s visit to the customer’s place of business, where the bank assesses it as necessary * Information about the purpose and intended nature of business relations with the bank * Records in a relevant and independent registry in the country or jurisdiction of constitution * Country or jurisdiction of constitution * **Trust deed** * Names of the settlors/trustees/beneficiaries or any person who has power over the disposition of any property that is subject to the trust * **Declaration of trusts** * **Deed of retirement and appointment of trustees (where applicable)**   While these are listed as ‘Examples of CDD information’, SCB Singapore adopts this as the guideline in relation to what ought to be mandatorily collected, **except** for the Trust deed, which is specifically not compulsory where the client is managed by (i) a Trustee based in equivalent jurisdictions, or (ii) a PvB account of Trusts that is managed by Standard Chartered Trustee. | | | |
| **Reference of Local Regulation** | | | |
| Guidelines to MAS Notice 626; Guidelines to MAS Notice TCA-N03. | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-010** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures [5.8] | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| 5.8 Translation Requirements:  Where any relevant information, documentation or results from searches is not in either English or the official language of the relevant Group Office, an English translation of the document (covering the type, name and key information of the document) is required. This translation may be provided by a Staff member or an Appropriate Agent who is fluent in the language in which the document is written. Use of an external translation service provider must be done in accordance with the Group Outsourcing Policy. The translator must annotate his/her name, job title and date of translation on the copy of the translated document. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Where a member of Staff is providing translation, this member of Staff must be **independent of the client relationship.**  For the purposes of this deviation, a bank/trust company staff is considered independent of the client relationship if he/she is not managed by, or reports to the RM who manages the client relationship. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is due to local regulations.  Under MAS Guidelines to Notice 626 [6-6-7] and MAS Guidelines to Notice TCA-N03 [6-5-8] where a document is in a foreign language, the bank/trust company should ensure that any document that is critical for performance of any measures required under that Notice is translated into English by a suitably qualified translator. Alternatively, the bank may rely on a translation of such document by a bank staff independent of the client relationship who is conversant in that foreign language. | | | |
| **Reference of Local Regulation** | | | |
| Guidelines to MAS Notice 626; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-011** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures [5.1] | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Under the Group CDD Procedures [5.1], the tax status of Clients must be established according to the requirements of the Group Customer Tax Information Reporting Compliance Policy, which contains specific due diligence, identification and documentation requirements for Clients. There is however no requirement to perform a tax evasion assessment. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| For Individuals Clients in the Retail Segment, only Clients that are holders of a Prominent Public Function (“**PPF**”) in any country outside of Singapore, or have adverse tax news, must complete tax evasion assessment at on-boarding and at periodic review.  For all other clients (including individuals in PVB and Trust segment and non-individual clients in all segments), tax evasion assessment is mandatory at on boarding and at periodic review.  The Tax Evasion Assessment forms are as attached | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements.  With effect from 1 July 2013, the offences of tax evasion and serious fraudulent tax evasion under the Income Tax Act, and the offences of tax evasion and improperly obtaining refunds under the Goods and Services Tax Act have been designated as money-laundering predicate offences. Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of benefits) Act ("CDSA") has been amended as well.  With respect to banks that carry out private banking, the MAS Private Banking Controls Paper at [3.5] & [3.6] obliges banks to identify higher-risk clients and sets out some guidance in connection with the same.  Pursuant to the MAS Guidelines to Notice 626 and MAS Guidelines to Notice TCA-N03 at [8-6-6], a bank/trust company is also expected to reject a prospective client where there are reasonable grounds to suspect that the client’s assets are the proceeds of serious crimes, including wilful and fraudulent tax evasion.  Industry best practice paper, “Private Banking in Singapore Code of Conduct” [6.1.1] and [6.1.2]:  [6.1.1] Play their part in preserving the integrity of the financial system. In particular, guarding against the use of its operations to knowingly or deliberately facilitate any transaction that is or may be connected with money-laundering, terrorist financing, proliferation financing, tax evasion, or the conduct of any other criminal activities.  [6.1.2] Require all relevant staff to take steps, including defining the appropriate documentary information, to:  (a) establish and verify the identity of the client; and  (b) reasonably establish the source of funds to be legitimate,  as part of the client acceptance procedures.    The MAS Information Paper, “Guidance on Private Banking Controls” published in June 2014 provides at [3.5]-[3.6] that:-  [3.5] Financial institutions have in place appropriate risk management frameworks and processes to adequately identify, assess and control ML/TF risks associated with their client profiles. These frameworks and processes are in place both at the point of on-boarding and on an ongoing basis.  [3.6] Factors considered by financial institutions in determining the ML/TF risk classification of clients are sufficiently comprehensive to ensure that clients with higher ML/TF risk are appropriately identified and subjected to enhanced CDD measures. Such factors typically include political connections of the client and related individuals, involvement in high-risk countries/business industries, complexity of structures used and known adverse information on the client.  Sound Practices  Some financial institutions consider additional criteria such as size of assets under management, and if the clients are publicly known persons, i.e. high profile individuals, in deciding whether to subject the accounts to enhanced CDD measures.”  MAS Guidelines to Notice 626 provide at [8-6-6] that:-  With regard to tax and other serious crimes, as a preventive measure, banks are expected to reject a prospective client where there are reasonable grounds to suspect that the client’s assets are the proceeds of serious crimes, including wilful and fraudulent tax evasion. Where there are grounds for suspicion in an existing client relationship, banks should conduct enhanced monitoring and where appropriate, discontinue the relationship. If the bank is inclined to retain the client, approval shall be obtained from senior management with the substantiating reasons properly documented, and the account subjected to close monitoring and commensurate risk mitigation measures. This requirement applies to serious foreign tax offences, even if the foreign offence is in relation to the type of tax for which an equivalent obligation does not exist in Singapore. Examples of tax crime related suspicious transactions are set out in Appendix B of these Guidelines.  MAS Guidelines to Notice TCA-N03 provide similar requirements under [8-6-6]. | | | |
| **Reference of Local Regulation** | | | |
| Private Banking in Singapore Code of Conduct; MAS Information Paper “Guidance on Private Banking Controls”(June 2014); Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 (attached in Annex 1, Item 8) | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-012** |
| **A** | **Group CDD Procedures– Document Name and Section Number** | | | |
| Group CDD Procedures, [3.2] Segment Prohibitions [4.3.3] Minimum Risk Rating for Clients Displaying Particular Risk Factors | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Group CDD Procedures [3.2] sets out Client Segment Prohibitions, [4.1] sets out the risk factors for the CRA model, [4.3.3] sets out the Minimum Risk Rating for Clients Displaying Particular Risk Factors | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| In addition to the existing Group risk classification, the following shall also be considered “High Risk”:  Business and Activity risk   1. Stored Value Facility Holders (internet-based) 2. Virtual Currencies Providers/Exchanges (e.g. Bitcoin) 3. Corporate Service Providers (CSP) 4. SG Freeport (Storage and Warehousing) 5. Pawnbrokers   Item (b) is already prohibited under Digital Currency Provider under [3.1]  Item (c) is already prohibited for the Retail Segment under [3.2], Table 1.  Geographical Risk   1. Where any beneficial owner of the customer is from or in a country or jurisdiction where the Quality of Regulation is very weak, the geographical risk rating will be deemed as high for purpose of client risk rating calculation.   Minimum Risk Rating. The following clients shall be assigned a High Risk Rating of D:   1. Moneylenders who lend money to individuals who need financial relief, but can neither obtain credit from banks nor offer many valuables to pawnbrokers 2. Where the beneficial owner of an Entity Client is a non-resident national of countries in relation to which the FATF has called for countermeasures 3. PIV in Retail-Business Banking where the client’s AUM do not meet the “High Net Worth” criteria (i.e. AUM is less than USD 2mio). These PIV clients are also to be subjected to the same controls for PIV with AUM above USD 2mio under Appendix Z10     SCT Singapore, as a matter of policy, will only provide trust and fiduciary services to PvB Clients who have established and maintain a relationship with PvB. Hence, the same prohibitions and restrictions for PvB also apply to the Trust segment.  For operationalisation purposes  A high risk ISIC code as shown below should be selected in addition to other ISIC codes describing the client’s business:  Business and Activity risk  a)    Stored Value Facility Holders (internet-based) - *ISIC code 8190 (Financial Institutions & Financial Services N.E.C – High Risk)*  b)    Virtual Currencies Providers/Exchanges (e.g. Bitcoin) - *ISIC code 8171 (Foreign Exchange Brokers & Dealers – High Risk)*  c)     Corporate Service Providers (CSP) - *ISIC code 8320 (Legal Services – High Risk)*  d)    SG Freeport (Storage and Warehousing) - *ISIC code 9453 (Art Galleries – High Risk)*  e)    Pawnbrokers - *ISIC code 8190 (Financial Institutions & Financial Services N.E.C – High Risk)* | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation request is due to local regulatory requirements.  Guidelines to MAS Notice 626, at para 4-11 and 4-12 provide that the above-listed type of clients must be deemed as high-risk. Hence, SCB Singapore rates them as highrisk, in addition to those already listed in Appendix F.  **Under paras. [4-11] and [4-12] of the Guidelines to MAS Notice 626:**  [4-11]A bank should incorporate the results of Singapore’s NRA Report **[Singapore’s National ML/TF Risk Assessment (“NRA”) Report]** into its enterprise-wide ML/TF risk assessment process. When performing the enterprise-wide risk assessment, a bank should take into account any financial or non-financial sector that has been identified as presenting higher ML/TF risks. A bank should consider the NRA results and its enterprise-wide ML/TF risk assessment results when assessing the ML/TF risks presented by clients from specific sectors.  [4-12] The NRA also identifies certain prevailing crime types as presenting higher ML/TF risks. A bank should consider these results when assessing its enterprise-wide ML/TF risks of products, services, transactions and delivery channels and whether it is more susceptible to the higher risk prevailing crime types. Where appropriate, a bank should also take these results into account as part of the bank’s ongoing monitoring of the conduct of clients’ accounts and the bank’s scrutiny of clients’ transactions.  **Under paras. 8-2 of the Guidelines to MAS Notice 626// MAS Notice TCA-N03:**  **[8-2] Examples of potentially higher risk categories under paragraph 8.7 of the Notice include ―**  **(a) Customer risk**  **(i) customers from higher risk businesses / activities / sectors identified in Singapore’s NRA, as well as other higher risk businesses / activities / sectors identified by the bank;**  (ii) the ownership structure of the legal person or arrangement appears unusual or excessively complex given the nature of the legal person’s or legal arrangement’s business;  **(iii) legal persons or legal arrangements that are personal asset holding vehicles;**  (iv) the business relations is conducted under unusual circumstances (e.g. significant unexplained geographic distance between the bank and the customer);  (v) companies that have nominee shareholders or shares in bearer form; and  vi) cash-intensive businesses.  **Under paras. 8.6b of the MAS Notice 626:**  **[8.6] For the purposes of paragraph 8.5, circumstances where a customer presents or may present a higher risk for money laundering or terrorism financing include but are not limited to the following:**  (a) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction in relation to which the FATF has called for countermeasures, the bank shall treat any business relations with or transactions for any such customer as presenting a higher risk for money laundering or terrorism financing; and  (b) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction known to have inadequate AML/CFT measures, as determined by the bank for itself or notified to banks generally by the Authority or other foreign regulatory authorities, the bank shall **assess whether any such customer presents a higher risk for money laundering or terrorism financing**.  **Under paras. 8.6b of the MAS Notice TCA-N03:**  8.6 For the purposes of paragraph 8.5, circumstances where a trust relevant party presents or may present a higher risk for money laundering or terrorism financing include the following:  (a) where a trust relevant party, any effective controller of a settlor or any effective controller of a trustee is from or in a country or jurisdiction in relation to which the FATF has called for countermeasures, the trust company shall treat any business contact with such trust relevant party as presenting a higher risk for money laundering or terrorism financing; and  (b) where a trust relevant party, any effective controller of a settlor or any effective controller of a trustee is from or in a country or jurisdiction known to have inadequate AML/CFT measures, as determined by the trust company for itself or notified to trust companies generally by the Authority or other foreign regulatory authorities, the trust company shall assess whether any such trust relevant party presents a higher risk for money laundering or terrorism financing.  Country or jurisdiction in relation to which the FATF has called for countermeasures  As of Feb 2017, such jurisdictions are Iran and North Korea (refer to FATF Public Statement <http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2017.html> | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03; Singapore’s National ML/TF Risk Assessment (“NRA”) Report | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-013** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures – CIB Segment Addendum Section 6.7.1.3 PEP-Linked Entities | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| The Head of the Group PEP and Sensitive Client Unit (“GPSCU”) can delegate authority to the relevant FCC CRM team to:   1. Decide on the PEP status of Clients; 2. Review and approve PEP-linked Clients for on-boarding from an FCC perspective; 3. Remove PEP status from a Client where PEP-linked risk is demonstrably reduced (e.g., where a PEP director or shareholder leaves office); 4. As part of CDD on-boarding and review approval, recommend any appropriate next steps or additional controls to manage the PEP risk – which may include, but is not restricted to, recommending that the Group PEP be elevated to a Group Sensitive PEP status; and 5. Consult or escalate ambiguity of a PEP status to GPSCU.   According to Section 6.7.1.3 of the CIB Segment Addendum, the Regional FCC Client Risk Management team has been delegated the authority to decide on the PEP status of clients, and review and approve PEP-linked Clients for on-boarding from an FCC perspective.  The CIB Addendum is silent regarding Country FCC input. It does not specify that Country FCC input is required for onboarding and retention of PEPs. | | | |
| **C** | Requested Country-Specific Deviation | | | |
| **Inputs from SCB SG FCC**  In addition to any approvals, the input from the SCB Singapore FCC function is also required to establish or continue business relations with the PEP customer in SCB Singapore. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | CB, CIB | Ongoing | |
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| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| Guidelines to MAS Notice 626 requires input from Singapore FCC.  Para [8-5-3] of the Guidelines to MAS Notice 626 states:  In relation to paragraph 8.3(a) of the Notice, the approval shall be obtained from senior management. Inputs should also be obtained from the **bank’s AML/CFT compliance function**.  Para. [8.3] of MAS Notice 626 states:  A bank shall, in addition to performing CDD measures (specified in paragraph 6), perform at least the following enhanced CDD measures where a customer or any beneficial owner of the customer is determined by the bank to be a politically exposed person, or a family member or close associate of a politically exposed person under paragraph 8.2:  (a) **obtain approval from the bank’s senior management** to establish or continue business relations with the customer; ..  “AML/CFT compliance function” in para 8-5-3 of the Guidelines to MAS Notice 626 refers to Singapore FCC, according to regulatory expectation. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626 (attached in Annex 1, Item 1)  Guidelines to MAS Notice 626 (attached in Annex 1, Item 2) | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-014** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures 6.7.5 | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Upon being classified as a PEP, the classification must be retained for at least one year after the individual has ceased to hold the PPF. After that point, the PEP classification may be lifted where the risk has demonstrably reduced. This will always be a matter of judgment and will depend on several factors. The Group PEP Procedures includes a list of cases where PEP statuses can never be removed, and they include:   * former heads of state or government; * former heads of armed forces or intelligence services; * senior members of ruling royal families with governing responsibilities equivalent to the above 2 bullet points; or * where doing so would conflict with local law.   In all other cases, the GPSCU or those acting under delegated authority must agree to the removal of the PEP status of a Client, on the basis of a case made by the Business demonstrating why the risk has been reduced. The Group PEP Procedures and associated guidance will include the criteria for assessing whether a PEP status may be removed:   1. the prominence of the PEP’s position held and the time spent in office; 2. the corruption risk of the country/ countries where there is political exposure; 3. any links to industries that are prone to corruption; 4. the PEP’s activity over the course of its relationship with the Group, if relevant, including whether there have been SARs filed on the PEP; 5. whether there is any Adverse Information on the PEP; and 6. whether the individual’s previous PEP position and current function are linked in any way (e.g. whether the ex-PEP was appointed to his current position or function by his successor, or whether the ex-PEP continues to substantively exercise the same powers in his current position or function).   The Business must put together the case for why the PEP status should be removed, and escalate this in line with Section 6.7.3. | | | |
| **C** | Requested Country-Specific Deviation | | | |
| In SCB Singapore, PEP status may never be removed for those who hold or have held prominent public functions outside of Singapore (foreign PEPs), or family members and close associates of those holding such functions.  However, as part of SCB Singapore’s risk-based approach, Domestic PEPs (i.e. where the PEP’s role is held in Singapore), International Organisation PEPs, their family members and close associates, may have PEP status removed provided the following conditions are met:   * The PEP has ceased to hold Prominent Public Function for 3 years or more; * The PEP does not currently hold any other prominent public function; * The PEP does not retain or maintain any links to his former PEP position; * The PEP’s immediate family members or known close associates connection themselves do not hold any prominent public function; * There is no adverse media/negative press relating to corruption, tax evasion or other financial crime on the PEP; and * The PEP has not been the subject of any Suspicious Transaction Report. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| The MAS Guidelines to Notice 626 at [8-5-11] prescribe certain factors that a bank should take into account when determining the level of influence that a PEP continues to exercise even after he/she has stepped down from a position where he/she holds a prominent public function. This deviation is raised to take those factors into account.  MAS Guidelines to Notice 626 at [8-5-11]  [8-5-11] With reference to paragraph 8.4(c) of the Notice, while the time elapsed since stepping down from a prominent public function is a relevant factor to consider when determining the level of influence a PEP continues to exercise, it should not be the sole determining factor. Other risk factors that the bank should consider are ―   1. the seniority of the position that the individual previously held when he was a PEP; and 2. whether the individual’s previous PEP position and current function are linked in any way (e.g. whether the ex-PEP was appointed to his current position or function by his successor, or whether the ex-PEP continues to substantively exercise the same powers in his current position or function).”   A risk-based approach has been taken by SCB Singapore, as supported by industry practice in Singapore, that the deviation set forth in Box C is required. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626. | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-015** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures at [3.1] | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Save for segment-specific exceptions in Section 3.2, the Group will not establish new relationships, open new Accounts, undertake One-off Transactions, maintain existing relationships or Accounts, or otherwise conduct business with:   1. specific categories of Politically Exposed Persons (“**PEPs**”), as set out in the Group Procedures on Politically Exposed Persons (“**Group PEP Procedures**”); | | | |
| **C** | Requested Country-Specific Deviation | | | |
| If the client is an Individual who falls within the list of prohibited PEPs\*;  or  If the client is a sole proprietorship and the Business Owner falls within the list of prohibited PEPs;  or  If the client is (i) a partnership (ii) privately owned company or (iii) trust, foundation or similar entity that falls within the Directive on Controls for Personal Investment Vehicle (PIV), and the Beneficial Owner defined therein falls within the below-mentioned prohibited PEPs.  SCB Singapore will not establish new relationships, open new Accounts, undertake One-off Transactions, maintain existing relationships or Accounts, or otherwise conduct business with such clients.  \*The prohibited PEPs are as follows:  Prominent Public Function holders\*\* from the following countries or Family Members\*\* # of such holders:   1. Russia; 2. Nigeria; 3. Kenya; 4. Venezuela; and 5. Bangladesh   *\*\* The meaning of “Prominent Public Function holders” and “Family Members” follows their corresponding definition in Group CDD Procedures and this Country Addendum (see* ***C-1*** *and* ***B-014*** *respectively).*  *#*  *The prohibition applies only where there is reason to believe that the Immediate Family Members may be acting as a front or proxy  for the Prominent Public Function Holders of these Countries; or when the Immediate Family Members do not have an independent SOW and/or their  SOW/SOF is from the Prominent Public Functions holder.*  *The prohibition also extends to: (a) PIVs where the Beneficial Owner is the Prominent Public Function holder and /or his/her Immediate Family Members; and (b) Trust structures where the Settlor or the Asset Contributor is the of the Prominent Public Function holder and /or his/her Immediate Family Members.* | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| Individuals;  Sole Proprietorships;  Partnerships;  Privately Owned Company;  Trusts, Foundations and Similar Entities | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required to ensure that SCB Singapore complies with the Guidelines to MAS Notice 626 and the Association of Banks in Singapore’s Guidelines on Anti-Money Laundering and Countering the Financing of Terrorism (“ABS Guidelines”) which provide guidance on banks’ obligations under the MAS Notice 626.  Guidelines to MAS Notice 626 at [8-5-4] states:  In relation to paragraph 8.3(b) of the Notice, a bank may refer to information sources such as asset and income declarations, which some jurisdictions expect certain senior public officials to file and which often include information about an official’s source of wealth and current business interests. A bank should note that not all declarations are publicly available. **A bank should also be aware that certain jurisdictions impose restrictions on their PEPs’ ability to hold foreign bank accounts**, to hold other office or paid employment.  Guidelines to MAS Notice TCA-N03 at [8-5-4] states:  In relation to paragraph 8.3(b) of the Notice, a trust company may refer to information sources such as asset and income declarations, which some jurisdictions expect certain senior public officials to file and which often include information about an official’s source of wealth and current business interests. **A trust company should note that not all declarations are publicly available. A trust company should also be aware that certain jurisdictions impose restrictions on their PEPs’ ability to hold foreign bank accounts**, to hold other office or paid employment.  ABS Guidelines at [6.11] provide that, among other things, a bank “should have a list of unacceptable customers and customer categories, which they should update periodically. Banks may wish to visit the links below for information on jurisdictions that restrict PEPs or public officials holding foreign bank accounts”.  Based on the following reliable public information links referenced in the ABS Guidelines at 6-11, Russia, Nigeria, Kenya, Venezuela and Bangladesh have prohibitions on their respective prominent public function holders holding foreign bank accounts.   1. [www.ey.com/Publication/vwLUAssets/EY-Legal-Alert-30-December-2014-Eng/$FILE/EY-Legal-Alert-30-December-2014-Eng.pdf](http://www.ey.com/Publication/vwLUAssets/EY-Legal-Alert-30-December-2014-Eng/$FILE/EY-Legal-Alert-30-December-2014-Eng.pdf) (Note: This is a prohibition on foreign accounts in banks located abroad on certain Russia individuals.) 2. [www.transparency.org/files/content/corruptionqas/287\_Foreign\_exchange\_controls\_and\_assets\_declarations.pdf](http://www.transparency.org/files/content/corruptionqas/287_Foreign_exchange_controls_and_assets_declarations.pdf) (Note: This Transparency International report states that Venezuela, Nigeria, Kenya and Bangladesh restrict or prohibit politicians or public officials from establishing and holding overseas bank accounts as a way to prevent corruption and money laundering.) 3. [www.kenyaembassy.com/pdfs/The%20Constitution%20of%20Kenya.pdf](http://www.kenyaembassy.com/pdfs/The%20Constitution%20of%20Kenya.pdf) (Note: This is the Kenya constitution.) 4. <http://unpan1.un.org/intradoc/groups/public/documents/aapam/unpan038432.pdf> (Note: This is the Nigeria constitution.) 5. [www.business-anti-corruption.com/country-profiles/the-americas/venezuela/initiatives/public-anti-corruption-initiatives.aspx](http://www.business-anti-corruption.com/country-profiles/the-americas/venezuela/initiatives/public-anti-corruption-initiatives.aspx) (Note: Document is in Spanish. In pg.24, the sentence “Tercera. Los funcionarieos publicos no podrain abriri cuentas innominadas en el exterior” translates to “Public officials cannot open accounts abroad”.) | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626 ; ABS Guidelines on Anti-Money Laundering and Countering the Financing of Terrorism; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-016** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures [3.1] and [3.2] | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Group CDD Procedures [3.1] contains a list of prohibited client types. Group CDD Procedures [3.2] sets forth the guidance on the appropriate segments to onboard the types of clients and segment prohibitions.  PVB may onboard “An Individual Client who is a non-resident national of a Sanctioned Country or Territory” or “An Entity Client which is less than 25% owned by an individual who is a resident of a Sanctioned Country or Territory and additionally, in the case of the Retail Banking Segment only, a resident or national of a Sanctioned Country/ Territory or Prohibited Country”.  Retail-Employee Banking may also onboard such clients subject to the approvals and controls. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| This deviation is requested over and above the existing CDD procedures.  Where any:  - individual client resides in or is a national of, or  - non-individual client whose beneficial owner(s)/shareholder(s) resides in ,  countries in relation to which the FATF has called for countermeasures, such relationships shall be prohibited. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required due to local regulatory requirements/expectations.  Under MAS Notice 626/Notice TCA-N03 [8.6] read with MAS Guidelines to Notice 626/Notice TCA-N03 [8-6-2], a bank/trust is expressly required to apply enhanced due diligence measures to clients/trust relevant party deemed presenting a ML/CTF risk where that **client** **or** **any beneficial owner of the client** or trust relevant party is from or in a country or jurisdiction which FATF has called for countermeasures.  As of Feb 2017, such jurisdictions are Iran and North Korea (refer to FATF Public Statement <http://www.fatf-gafi.org/publications/high-riskandnon-cooperativejurisdictions/documents/public-statement-february-2017.html>  These countries are also found in the Group’s list of Sanctioned Countries. However, Group Procedures permits the onboarding of clients in PvB and Retail Employee Banking subject to exceptional approvals and controls. This deviation is to request that such clients must continue to be prohibited in all segments of SCB SG. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626 ; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-017** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures, [9.2]- Authority to Make Decisions on Clients with Sanctions Links, [9.2.2.1] -Review by Stakeholders | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| For prospective Clients, the approval of the relevant Segment Client Committee or senior Staff members must be obtained before CDD is completed and the relationship is established.  For existing Clients, where previously unknown links to any Sanctioned Country or Territory, Country Subject to Sectoral Sanctions or a Sanctioned Party (including an increase or decrease in the extent of, or change in, the nature of a Client’s known Sanctions Nexus) are identified in the course of the relationship, steps must be taken as set out in Section 11 on CDD Trigger Reviews, and the relationship must be escalated to the relevant Segment Client Committee or senior Staff members as soon as possible upon the identification of such Sanctions Nexus and, in any event, no later than ninety (90) days from the identification of such Sanction Nexus. Otherwise, the Business must put in place appropriate risk mitigation measures in respect of the Client. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Because the “relevant client committee or senior Staff members” under the Group Procedures may not include the Singapore Head of FCC and Singapore Head of Client Segment, in addition to the Group Requirements in Box B above, for RB, CB and CIB segments, SCB Singapore will always require the **Singapore Head of FCC and the Singapore Head of Client Segment** (or their delegates, where permitted under Group Procedures) to provide approval on clients with sanctions nexus. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This is due to a local regulatory requirement.  Para [8-5-3] of the Guidelines to MAS Notice 626 and paras. 8.3, 8.5, 8.7 and 8.8 of the MAS Notice 626 collectively provide that input from the bank’s AML/CFT compliance should be obtained when establishing or continuing business relations with a customer that presents a higher risk for money laundering or terrorism financing.  The bank’s “AML/CFT compliance function” in Singapore is the Singapore FCC, according to regulatory expectation. A risk-based approach has been taken by SCB Singapore to require that both the Singapore Head of FCC and the Singapore Head of Client Segment approve on-boarding and retention of clients with sanctions links due to the higher risk for money laundering or terrorism financing that such clients present.  Para [8-5-3] of the Guidelines to MAS Notice 626 states:  In relation to paragraph 8.3(a) of the Notice, the approval shall be obtained from senior management. Inputs should also be obtained from the **bank’s AML/CFT compliance function**.  Para. [8.3] of MAS Notice 626 states:  A bank shall, in addition to performing CDD measures (specified in paragraph 6), perform at least the following enhanced CDD measures where a customer or any beneficial owner of the customer is determined by the bank to be a politically exposed person, or a family member or close associate of a politically exposed person under paragraph 8.2:  (a) **obtain approval from the bank’s senior management** to establish or continue business relations with the customer;  (b) establish, by appropriate and reasonable means, the source of wealth and source of funds of the customer and any beneficial owner of the customer; and  (c) conduct, during the course of business relations with the customer, enhanced monitoring of business relations with the customer. In particular, the bank shall increase the degree and nature of monitoring of the business relations with and transactions for the customer, in order to determine whether they appear unusual or suspicious.  Para [8.5] of MAS Notice 626 states:  A bank shall implement appropriate internal risk management systems, policies, procedures and controls to determine if business relations with or transactions for any customer present a higher risk for money laundering or terrorism financing.  Para. [8.7] of MAS Notice 626 states:  A bank shall perform the appropriate **enhanced CDD measures** in paragraph 8.3 for business relations with or transactions for any customer :  (a) who the **bank determines under paragraph 8.5**; or  (b) the Authority or other relevant authorities in Singapore notify to the bank,  **as presenting a higher risk** for money laundering or terrorism financing.  Para [8.8] of MAS Notice 626 states:  A bank shall, in taking enhanced CDD measures to manage and mitigate any high risks that have been identified by the bank or notified to it by the Authority or other relevant authorities in Singapore, ensure that the enhanced CDD measures take into account the requirements of any laws, regulations or directions administered by the Authority, including but not limited to the regulations or directions issued by the Authority under Section 27A of the MAS Act (which deals with compliance with UNSC decisions). | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626 (attached in Annex 1, Item 1) | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-018** |
| **A** | **Group CDD Procedures– Document and Section Number** | | | |
| Group CDD Procedures, [5.5.2]- Names to Capture for Name Screening | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Names appearing in the acceptable documents for verification set out in Sections 5.7.1 and 5.7.5 must be recorded for screening. Where such documents contain different spellings of the same name or aliases, all names and aliases must be recorded and screened | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| SCB Singapore will require Aliases\* **obtained** to be screened, even if these names do not appear in the acceptable documents for verification  \**Alias includes not just names appearing on Government ID Documents, but includes names that the individual is commonly known as (eg. artiste name, trade name, an often used business name in correspondence and communication, or a commonly known name in the public domain) and former/previous names.* | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| Individual and Non-individual Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| Para. 6-15/6-13 of the Guidelines to MAS Notice 626/Guidelines to MAS Notice TCA-N03 requires all parties identified pursuant to the MAS Notice 626/MAS Notice TCA-N03 to be screened.  **[6-15]/[6-13] Screening**  [6-15-1]/[6-13-2] Screening is intended to be a preventive measure. A bank/trust company is reminded that all parties identified pursuant to the Notice are required to be screened, irrespective of the risk profile of the customer/trust relevant party.  **MAS Notice 626 /MAS Notice TCA-N03**  [6.5]/[6.4] A bank/trust company shall identify each customer.  [6.6]/[6.5] For the purposes of paragraph 6.5/6.4, a bank/trust company shall **obtain at least** the following information:   1. full name, including any **aliases**; ... .   A client may be better known publicly or socially by a name that is not on the official identification documents. Aliases of SDNs and Sanctioned Parties are also included on regulatory watchlists which forms the searchable database for regulatory name screening. From a risk-based approach, aliases of client should be name screened against the watchlists. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626 ; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-019** |
| **A** | **Group CDD Procedures– Document and Section Number** | | | |
| Group CDD Procedures, 6.9.1 - Adverse Information Screening and Public Domain Searches | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Adverse Information screening must be conducted on relevant Clients and their Related Parties as per the requirements set out in the Group Screening Procedures.  Public domain searches for Adverse Information must be performed on higher risk-rated Clients at on-boarding and during Periodic Review, as follows:   * + 1. RI, BB and PvB Segments – for Clients risk-rated C and above;     2. CIB/CB Segments – for Clients risk-rated D and above. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| SCB Singapore will require Adverse Information Screening for all Clients & their Related Parties regardless of risk rating, both at on-boarding and on an ongoing basis. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| Para 29 of the MAS consultation response to MAS Notice 626, Para 6-15 of the MAS Guidelines on MAS Notice 626 and MAS Notice para 6.40(a) and (d) state that screening of clients, regardless of risk rating, should be conducted at on-boarding and periodically.  Para 29 of MAS consultation response to MAS Notice 626  **[29]. Paragraph 6.39: Customer Screening and Parties to Screen**  [29.1] Several respondents asked about the parties that banks were required to screen. Some respondents also asked for greater clarity on the ML/TF information sources that banks should use for screening purposes.  MAS’ Response  [29.2] Banks are required to screen the following parties: customers, natural persons appointed to act on behalf of customers, connected parties of customers and beneficial owners of customers. Banks should ensure that the necessary CDD information on these parties is captured in its customer information database for periodic name screening against the various ML/TF information sources and databases. This is to enable banks to promptly detect if any of the above parties should subsequently become a sanctioned or a high risk person.  [29.3] Some examples of the ML/TF information sources banks should use for screening include ―  a) commercial ML/TF databases used to identify adverse information on individuals and entities;  b) information sources from the bank’s head office or parent supervisory authorities which identify individuals and entities; and  c) lists of individuals and entities covered under the MAS Regulations7 in relation to United Nations Security Council (“UNSC”) sanctions or the freezing of assets of persons.  [29.4] MAS has provided more guidance on the topic of screening in paragraph 6-15 of the Guidelines.  Under Para [6-15] of the Guidelines to MAS Notice 626:  [6-15-1] Screening is intended to be a preventive measure. A bank is reminded that all parties identified pursuant to the Notice are required to be screened, **irrespective of the risk profile of the customer**.  [6-15-2] Where screening results in a positive hit against sanctions lists, a bank is reminded of its obligations to freeze without delay and without prior notice, the funds or other assets of designated persons and entities that it has control over, so as to comply with applicable laws and regulations in Singapore, including the TSOFA and MAS Regulations issued under section 27A of the Monetary Authority of Singapore Act (Cap. 186) (“MAS Act”) relating to sanctions and freezing of assets of persons. Any such assets should be reported promptly to the relevant authorities and a Suspicious Transaction Report (“STR”) should be filed.  [6-15-3] A bank should put in place policies, procedures and controls that clearly set out ―  (a) the ML/TF information sources used by the bank for screening (including commercial databases used to identify adverse information on individuals and entities, individuals and entities covered under MAS Regulations issued pursuant to section 27A of the MAS Act, individuals and entities identified by other sources such as the Bank’s head office or parent supervisory authority, lists and information provided by the Authority and relevant authorities in Singapore);  (b) the roles and responsibilities of the bank’s employees involved in the screening, reviewing and dismissing of alerts, maintaining and updating of the various screening databases and escalating hits;  (c) the frequency of review of such policies, procedures and controls;  (d) the frequency of periodic screening;  (e) how apparent matches from screening are to be resolved by the bank’s employees, including the process for determining that an apparent match is a positive hit and for dismissing an apparent match as a false hit; and  (f) the steps to be taken by the bank’s employees for reporting positive hits to the bank’s senior management and to the relevant authorities.  According to MAS Notice 626:  Screening  [6.39] A bank shall screen a customer, natural persons appointed to act on behalf of the customer, connected parties of the customer and beneficial owners of the customer against relevant money laundering and terrorism financing information sources, as well as lists and information provided by the Authority or other relevant authorities in Singapore for the purposes of determining if there are any money laundering or terrorism financing risks in relation to the customer.  [6.40] A bank shall screen the persons referred to in paragraph 6.39:  (a**) when, or as soon as reasonably practicable after, the bank establishes business relations with a customer**;  …  (d) on a **periodic basis** after the bank establishes business relations with the customer;  (e) when there are any changes or updates to -  (i) the lists and information provided by the Authority or other relevant authorities in Singapore to the bank; or  (ii) the natural persons appointed to act on behalf of a customer, connected parties of a customer or beneficial owners of a customer.  MAS Notice TCA-N03  6.34 A trust company shall screen a trust relevant party, natural persons appointed to act on behalf of the trust relevant party, connected parties of the trust relevant party, effective controllers of a settlor and effective controllers of a trustee against relevant money laundering and terrorism financing information sources, as well as lists and information provided by the Authority or other relevant authorities in Singapore for the purposes of determining if there are any money laundering or terrorism financing risks in relation to the trust relevant party.  6.35 A trust company shall screen the persons referred to in paragraph 6.34:  (a) in respect of the settlor and trustee of the trust, before the trust is constituted; provided that where the settlor has constituted the trust before establishing business contact with the trust company, the trust company shall screen the settlor and trustee of the trust before the provision of any trust business services;  (b) in respect of each beneficiary of the trust, as soon as reasonably practicable after the beneficiary becomes identifiable, and in any case before making a distribution to that beneficiary or when that beneficiary intends to exercise vested rights;  (c) in respect of any other trust relevant party, as soon as reasonably practicable after the trust company first comes into business contact with that trust relevant party;  (d) on a periodic basis after the trust company establishes business contact with the trust relevant party; and  (e) when there are any changes or updates to   (i) the lists and information provided by the Authority or other relevant authorities in Singapore to the trust company; or  (ii) the natural persons appointed to act on behalf of a trust relevant party, connected parties of a trust relevant party, effective controllers of a settlor or effective controllers of a trustee. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626; MAS consultation response to MAS Notice 626; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-020** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group Procedures- Appendix G: ID&V Requirements for individual clients – Right of Abode | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| Under Appendix G, identification and verification of a Current Residential Address is required for Individual Clients (including Beneficial Owners of PIVs). | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Notwithstanding the Group Requirements above, evidence of the right to reside in the country of Current Residential Address for an extended period of time is required for   * Individual Clients, * Beneficial Owners of PIV, and * Settlors/ asset contributors of Trust Clients   where the country of residence is different from the nationality. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All Individual Clients, Beneficial Owners of PIV, Settlers/Asset Contributors of Trust Clients | PvB and Trust | *Ongoing* | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation is required as tax-evasion risk mitigating control to understand the residency country of the client where their nationality is different from the country of residence address.  Clients could reside in multiple addresses, including maintaining residence in countries that may not be their country of tax residence. Where a client reside in a country (Country A) that is not the country of citizenship (Country B), SG FCC views that it be prudent for the bank to further ascertain that the client is tax resident of that country (Country A) as a tax-evasion risk mitigating measure.  Guidelines to MAS Notice 626 [8-6-6]  **[8-6] Other Higher Risk Categories**  [8-6-6] With regard to tax and other serious crimes, as a preventive measure, banks are expected to reject a prospective customer where there are reasonable grounds to suspect that the customer’s assets are the proceeds of serious crimes, including wilful and fraudulent tax evasion. Where there are grounds for suspicion in an existing customer relationship, banks should conduct enhanced monitoring and where appropriate, discontinue the relationship. If the bank is inclined to retain the customer, approval shall be obtained from senior management with the substantiating reasons properly documented, and the account subjected to close monitoring and commensurate risk mitigation measures. This requirement applies to serious foreign tax offences, even if the foreign offence is in relation to the type of tax for which an equivalent obligation does not exist in Singapore. Examples of tax crime related suspicious transactions are set out in Appendix B of these Guidelines  Guidelines to MAS Notice TCA-N03 [8-6-6]  **[8-6] Other Higher Risk Categories**  [8-6-6] With regard to tax and other serious crimes, as a preventive measure, trust companies are expected to reject a prospective trust relevant party where there are reasonable grounds to suspect that the trust relevant party’s assets are the proceeds of serious crimes, including wilful and fraudulent tax evasion. Where there are grounds for suspicion during the course of business contact with a trust relevant party, trust companies should conduct enhanced monitoring and where appropriate, discontinue the business contact. If the trust company is inclined to continue business contact with the trust relevant party, approval shall be obtained from senior management with the substantiating reasons properly documented, and the business contact subjected to close monitoring and commensurate risk mitigation measures. This requirement applies to serious foreign tax offences, even if the foreign offence is in relation to the type of tax for which an equivalent obligation does not exist in Singapore. Examples of tax crime related suspicious transactions are set out in Appendix B of these Guidelines. | | | |
| **Reference of Local Regulation** | | | |
| MAS Notice 626; Guidelines to MAS Notice 626 ; MAS Notice TCA-N03; Guidelines to MAS Notice TCA-N03 | | | |

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| **Country-Specific Deviation (More Stringent Requirement)** | | | | **B-021** |
| **A** | **Group CDD Procedures – Document Name and Section Number** | | | |
| Group CDD Procedures Section 5.3 Beneficial Ownership; 5.3.1 When Shareholders are deemed Beneficial Owners. | | | |
| **B** | **Requirement from the Group CDD Procedures** | | | |
| 5.3.1 When shareholders are deemed Beneficial Owners For companies, where a shareholder who is a natural person has aggregated shareholdings exceeding the following percentage thresholds, such shareholder will be deemed a Beneficial Owner:   1. for an entity Client which has a risk rating of A, B or C, any individual with direct or indirect ownership or voting rights (whether through equity or Bearer Shares) of **25%** or more; and 2. for an entity Client which has a risk rating of D or E, any individual with direct or indirect ownership or voting rights (whether through equity or Bearer Shares) of **10%** or more.   For legal arrangements other than companies, Beneficial Owners are the parties that are ultimately entitled to or control (whether the entitlement or control is direct or indirect):   1. for an entity Client which has a risk rating of A, B or C, any individual with **25%** or more of the capital, voting rights or the equivalent; and 2. for an entity Client which has a risk rating of D or E, any individual with **10%** or more of the capital, voting rights or the equivalent. | | | |
| **C** | **Requested Country-Specific Deviation** | | | |
| Except for those clients where SDD may be permitted under Group 5.1.1, where BO needs to be identified under 5.3.1:  For companies, where a shareholder who is a natural person has aggregated shareholdings exceeding the following percentage thresholds, such shareholder will be deemed a Beneficial Owner:   1. for an entity Client which has a risk rating of A, B or C, any individual with direct or indirect ownership or voting rights (whether through equity or Bearer Shares) of **10%** or more; and   For legal arrangements other than companies, Beneficial Owners are the parties that are ultimately entitled to or control (whether the entitlement or control is direct or indirect):   1. for an entity Client which has a risk rating of A, B or C, any individual with **10%** or more of the capital, voting rights or the equivalent;   For avoidance of doubts, a natural person who is otherwise able to exercise ultimate effective control over a Client without meeting the ownership thresholds of 10% will be deemed as a Beneficial owner. | | | |
| **D** | **Applicable Client Type** | **Applicable Business Segment** | **Expiry Date** | |
| All Entity Clients | RB, CB, CIB, PVB, Trust | Ongoing | |
| **Supporting Information** | | | | |
| **E** | **Deviation Type** | | | |
| 4. Other More Stringent Requirement4. Other More Stringent Requirement4. Other More Stringent Requirement4. Other More Stringent Requirement4. Other More Stringent Requirement | | | |
| **F** | **Rationale for Deviation** | | | |
| This deviation of 10% threshold to deem any individual with direct or indirect ownership or voting rights (whether through equity or Bearer Shares) regardless of risk rating as a Beneficial Owner.  This change come about as part of a national KYC project working group, where the threshold of BO was discussed and the 10% ownership threshold was agreed. | | | |
| **Reference of Local Regulation** | | | |
| N/A | | | |

**PART C: Additional Local Requirements**

Provide all local requirements that are not considered deviations to the Procedures as they are of neither higher nor lower standards.

As a guide, these requirements can include local interpretations of the requirements in the Procedures, content that is an extension or elaboration of the Procedures in order to provide local elements, as well as any segment-specific requirements applicable only for the Country.

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| **#** | **Additional Local Requirements** | **Applicable Client Type** | **Applicable Business Segment** |
| 1 | **Local PEP Definitions**  If the persons set out below are not regarded as a Group PEP under the Group CDD Procedures, SCB/SCT Singapore will regard such persons as local PEPs:-   1. Members of Parliament; 2. Nominated Members of Parliament; 3. Non- Constituency Members of Parliament; and 4. Directors, Deputy Directors and Members of the Board or equivalent functions of international organizations\*   \*International Organisations – include:   1. The United Nations and affiliated agencies such as the International Maritime Organisation and the International Monetary Fund; 2. Regional international organisations such as the Asian Development Bank, the ASEAN Secretariat, institutions of the European Union, the Organisation for Security and Cooperation in Europe; 3. Military international organisations such as NATO; and 4. Economic organisations such as WTO or Asia-Pacific Economic Cooperation Secretariat. 5. Local “senior civil or public servants”, which are:    1. Parliamentary Secretary;    2. Permanent Secretary;    3. Deputy Secretary; and    4. Head and Deputy Head (s) of a statutory board, government agency or public authority 6. Local senior executives of state owned corporations and government linked corporations, which are:    1. Chairman;    2. Chief Executive; and    3. Deputy Chief Executive (s)   See MAS Notice 626 8.1, read with Guidelines to Notice 626 8-4-2, 8-4-4, 8-4-5 and 8-5-11, and ABS Guidelines 6.11. For the Trust segment, see MAS Notice TCA-N03 8.1, read with Guidelines to Notice TCA-N03 8-4-2, 8-4-4, 8-4-5, 8-5-11. | All | RB, CB, CIB, PVB, Trust |
| 2 | **Government-Owned Entities include sovereign wealth funds**  For the avoidance of doubt, SWFs (as defined below) are considered to be Government-Owned Entities.   * A sovereign wealth fund (“SWF”) is a special purpose investment fund or arrangement, owned by the national government. SWFs hold, manage, or administer assets to achieve financial objectives, and employ a set of investment strategies which may include investing in foreign financial assets. * They typically take one of the following forms:  1. pool of assets managed by the Ministry of Finance or Central Bank; 2. government-owned corporation; or 3. independent corporation established by statute. | Government-Owned Entities | RB, CB, CIB, PVB, Trust |
| 3 | **Scope of Correspondent Banking Relationships**  As the following services are listed in Section 8.3 of the ABS Guidelines as being generally included as correspondent banking (and similar) services, SCB Singapore will apply the Group requirements set out for CBRs for:   1. cash management; 2. international funds transfers; 3. cheque clearing; 4. payable through accounts; 5. pouch activities; 6. bulk cash activities; 7. third-party payments; and 8. trade finance services, such as:    * Advising;    * Confirming; and    * Negotiating   for any bank that is operating outside Singapore, whether as a principal or for its customer.  “Similar Services” also include services undertaken by SCB Singapore for securities transactions for any bank that is operating outside Singapore, whether as a principal or for its customer.  For the avoidance of doubt, foreign exchange and money market transactions do not fall within the scope of “similar” services. | All non-individual clients | RB, CB, CIB, PVB |
| 4 | **Definition of ‘Beneficial Owners – where relevant’ of Clubs and Societies**  The office bearers of Clubs and Societies fall within the category of ‘Beneficial Owners – where relevant’ of a Club or Society under Appendix G. | Clubs and Societies | RB, CB, CIB, PVB, Trust |
| 5 | **Clients who are Minors**  Age of Majority is 18 years old.  Account structure:   * For E-savers kids: account will be set up as a trust account for minors below 18 years old. * For E-saver: Joint account will be set up where primary account holder must be the guardian and secondary account holder would be the minor (between 12-18 years old).   For PvB, a Minor can open an individual joint account with his/her parent/guardian but this should not be encouraged. For such accounts, we will only allow deposits and FX spot transactions. No investment products or loan facilities should be offered. Such CIFs will be tagged CRP8. This restriction does not apply to trust accounts or corporate accounts where the beneficial owner or shareholder of the PIC is a Minor. This is because the legal entity entering into transaction is the trust or PIC. | Individual/Joint | RB, PvB |
| 6 | **Acceptable documents for verification of residential address.**  SCB SG deems the following as acceptable documents for verifying residential address:   1. A recent utility bill issued within the last 3 months; 2. Recent correspondence from a Government department or agency (i.e. issued within the last 3 months); 3. Bank statements (including credit and debit card statements) issued by a bank Financial Institution (including SCB statement) within the last 3 months; 4. Introduction letters (within last 3 months) from a branch or subsidiary of a third party banking group headquartered in an Equivalent Jurisdiction. 5. A government-issued photographic driving license or national identify card containing the current residential address (excluding travel documents such as passport). 6. Inland Revenue notification/assessment letter; 7. A record of a visit to the residential address by SCB staff; 8. An acknowledgement of receipt duly signed by the customer in response to a letter sent by SCB to the address provided by the customer; 9. A letter from an immediate family member at which the individual resides confirming that the applicant lives at that address, setting out the relationship between the applicant and the immediate family member (for persons such as students and housewives who are unable to provide proof of address in their own names). For the avoidance of doubt, the immediate family member should provide an acceptable address verification document and should be a client of SCB; 10. Telecom bill (Land line or Mobile Phone) or pay TV statement (sent to the address provided by the customer) issued within the last 3 months; and 11. A Tenancy agreement.   Electronic version of (a), (b), (c), (f), or (j) obtained does not require certification. | All | RB, CB, CIB, PVB, Trust |
| 7 | **Appendix G, Part II – Additional Guidance on Verifying Client Identity at Table A, Documentary Verification, Row A4:**  As ID numbers are widely available in most acceptable data source (e.g. ACRA, CPF Statements, etc), SCB Singapore will include **ID number** as one of the elements to be verified via an acceptable data source, i.e. under (ii) of the Verification Measures:  (ii) individual name or entity name and at least one of the following **four** elements must be verified via an acceptable data source (see Section 5.7.5 in the Procedures):   1. date of birth / date of registration; 2. nationality / country of registration / incorporation; or 3. residential address / registered address; or 4. **ID number**. | All | RB, CB, CIB, PVB, Trust |
| 8 | **Renewal of Expired ID documents or updated residential proof**   | **Table 4 – CDD Review Requirements** | | | | --- | --- | --- | | **ID** | **Review Requirement** | **Detailed Requirements** | | **PR3** | When needed, refresh existing ID&V information | If changes are identified or deficiencies found in the ID&V information, such information should be re-obtained and re-verified as set out in Section 5 and **Appendix G**.  Expired verification documents do not need to be updated unless required by law; or if there are doubts on previously obtained verification documents. |   SCB/SCT Singapore will always require **expired** **identity documents or updated residential proof (for any change in residential information)** (where collected) of any individual client or related individual of a non-individual client to be refreshed or re-obtained at the time of the closest subsequent review for all risk-ratings, where such ID&V information has changed.  This is required under MAS Notice Para [6.24]:  Para 6.24, MAS Notice 626:  A bank shall ensure that the CDD data, documents and information obtained in respect of customers, natural persons appointed to act on behalf of the customers, connected parties of the customers and beneficial owners of the customers, are relevant and kept up-to-date by undertaking reviews of existing CDD data, documents and information, particularly for higher risk categories of customers. | All | RB, CB, CIB, PVB, Trust |
| 9 | **Clients with CBR**  Clients with whom the Group has a Correspondent Banking Relationship must have a minimum risk rating of C, and subject to CDD Periodic Reviews every 3 years. Where such clients are risk rated D or E, CDD Periodic reviews cycle is annually or Bespoke (at least once annually) respectively.  Given SCB SG’s earlier commitment to perform annual reviews for Correspondent Banking Relationship, concurrence is being sought from the local regulator to adopt Group’s standard. In the interim, SCB SG will adopt the Group’s standard and SCB SG will revert back to annual review in the event it is rejected by the local regulator. | CBR | CIB, CB |
| 10 | **Transaction History Review (i.e. Volume and Values) for CDD reviews and Incoming GIC renewals**  During periodic review, RM must review the monthly actual transactional activities (via on-demand reports for i. Cash and ii. Trade) against the expected activities. Expected range of monthly activity (transaction volume and value) for all products must be captured.  Results of the review shall be documented in this dashboard and attached as part of CDD records.    **Note:**  For the avoidance of doubt, it is the responsibility of the FAM to complete the transaction history review for incoming GIC renewals. | All | CIB, CB |

**Annex 1**

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| --- | --- | --- |
| **S/N** | **Title** | **Document** |
| 1. | MAS Notice 626 |  |
| 2. | Guidelines to MAS Notice 626 |  |
| 3. | Private Banking in Singapore Code of Conduct |  |
| 4. | MAS Information Paper “Guidance on Private Banking Controls”(June 2014) |  |
| 5. | Singapore’s National ML/TF Risk Assessment (“NRA”) Report |  |
| 6. | ABS Guidelines on Anti-Money Laundering and Countering the Financing of Terrorism |  |
| 7. | Notice to Trust Companies - MAS Notice TCA-N03 |  |
| 8. | Guidelines to MAS Notice TCA-N03 |  |
| 9 | MAS consultation response to MAS Notice 626 |  |

**Part D: Approval of Country Addendum**

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| --- | --- | --- | --- |
| **#** | **Position/Role** | **Name** | **Date** |
| **1** | **CMLCO** | Rosalind Lazar | 22 Sept 2017 |
| **2** | **Regional Head of FCC** | Jodie Arthur | 27 Sept 2017 |
| **3** | **Country OR Committee or Country FCC Committee** | CFCRC | 8 Sept 2017 |
| **4** | **Global Head of FCC (for Less Stringent Requirements)** | Not Required |  |

**PART E: Version Control / Change Log**

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| --- | --- | --- | --- |
| **Version** | **Author (Role)** | **Date** | **Description of Change** |
| **1.0** | **Leong Kok Cheong** | 16 November 2017 | Uplift to Group CDD Procedures v4.1 |
|  |  |  |  |
|  |  |  |  |

1. For country deviations against other group policies and procedures - for example, Group AML Policies and Procedures, or Group Sanctions Policies and Procedures - please follow their respective dispensation processes. [↑](#footnote-ref-1)