

MALAYSIA DEBT VENTURES BERHAD Document no: AMLCFTG-V1/2020	RESTRICTED ANTI-MONEY LAUNDERING & COUNTER-FINANCING OF TERRORISM GUIDELINES		
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ANTI MONEY-LAUNDERING AND COUNTER-FINANCING OF TERRORISM GUIDELINE

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Abbreviations

AML/ AMLATFA	-	Anti-Money Laundering and Anti-Terrorism Financing Act
AML/CFT	-	Anti-Money Laundering and Counter-Financing of Terrorism
AMLCFTG	-	Anti-Money Laundering and Counter-Financing of Terrorism Guideline
BNM	-	Bank Negara Malaysia
CDD	-	Customer Due Diligence
CEO	-	Chief Executive Officer
Company/MDV	-	Malaysia Debt Ventures Berhad
DSVP	-	Deputy Senior Vice President
EVP	-	Executive Vice President
FATF	-	Financing Action Task Force
HOD	-	Head of Divisions/ Departments
NCCT	-	Non-Cooperative Countries and Territories
NRIC	-	National Registration Identity Code
PEP	-	Politically Exposed Person
RMC	-	Risk Management Committee
RMD	-	Risk Management Division
SAVP	-	Senior Assistant Vice President
SVP	-	Senior Vice President
SOP	-	Standard Operating Procedure
VP	-	Vice President

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Document Revision History

Version	Date	Document No.	Summary of Changes
1	2020	AMLCFTG-V1/2020	Original Document

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Preface

Policy Statement

MDV adopts a zero tolerance policy against money-laundering and terrorism financing. The MDV's Code of Conduct sets out MDV's core principle on this matter. The document, namely Anti-money Laundering & Counter-Financing of Terrorism Guideline (hereinafter referred to as "AMLCFTG" or "the Guideline") outlines the requirements as set by Bank Negara Malaysia in dealing with money-laundering and terrorism financing in Malaysia.

Related Documents

This AMLCFTG shall be read together with other related internal policies/ frameworks/ procedures/ guideline/ manuals (including but not limited to Code of Conduct Policy, Anti-Fraud Policy, Whistleblowing Policy & Procedures, Fit & Proper Policy & SOP, Integrity & Anti-Corruption Policy & SOP, Employee Handbook and other Human Capital's Policies and SOPs) and/ or external policies/ frameworks/ procedures/ guideline/ manuals issued by the governing authorities.

Getting Help

Should any clarification and explanation is required, the employee is to consult their immediate supervisor/ HODs and/ or SAVP/ VP/ DSVP/ SVP/ EVP of the respective division/ department who shall refer the matter to RMD.

Change Request

For any amendments or changes that need to be made to this document, please forward the recommendations to RMD.

Document Creation Information

This Guideline is created by RMD, to be reviewed and approved by RMC.

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Introduction

This Guideline on Anti-Money Laundering and Combating the Financing of Terrorism are issued pursuant to Section 66E and Section 83 of the Anti-Money Laundering and Anti-Terrorism Financing Act (AMLATFA) 2001.

The Guideline are established and formulated to address the requirements that must be complied with by MDV under the AMLATFA to effectively combat money laundering and financing of terrorism activities.

The Guideline are drawn up in accordance with the AMLATFA and the FATF's Forty Recommendations on Money Laundering and Nine Special Recommendations on Terrorist Financing.

1.0 Objectives of the Guideline

The principal objectives of this Guideline are:

- 1.1 To provide guidance on how to recognise and deal with money-laundering and terrorism-financing issues which may be encountered by MDV staff.
- 1.2 To avoid penalty from BNM due to non-compliance on any acts related to AMLATFA 2001.

2.0 Coverage of the Guideline

- 2.1 This Guideline shall apply to all MDV staff.
- 2.2 It is also expected that all customers, contractors, subcontractors, consultants, solicitors, agents, representatives and others performing works or services for or on behalf of MDV to comply with the relevant parts of this Guideline.

3.0 Compliance with Laws and Regulations

- 3.1 This Guideline shall at all times comply with and be subject to the laws and regulations of Malaysia. In the unlikely event of any conflict or inconsistency between the provisions of Guideline and the laws and regulations of Malaysia, the latter shall prevail.

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3.2 The staff are required to report any suspicions on breaches of the Guideline in accordance with MDV's Whistleblowing Policy & Procedures.

4.0 Infringement of the Guideline

Any infringement of this Guideline shall constitute a serious misconduct or offence warranting disciplinary action against the offender.

5.0 Responsibility for the Guideline

RMD shall be the custodian of the Guideline and shall be responsible for developing, recommending, communicating and reviewing the Guideline. IAD shall be involved in assessing the adequacy and review of this Guideline.

6.0 Changes to the Guideline

6.1 Any changes to the Guideline shall be approved by the RMC unless the power to approve is delegated to the CEO.

6.2 RMD shall review the recommendation for changes before submitting to the RMC for approval.

7.0 Validity and Review of the Guideline

7.1 The effective date of this Guideline shall be immediately upon approval by the RMC.

7.2 This Guideline shall be reviewed every three (3) years or as and when deemed necessary by the RMC/ Management of MDV.

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1.0 DEFINITION

1.1 Money laundering

1.1.1. In general terms, money laundering is defined as the process of converting money/ property, which is derived from illegal activities to give it a legitimate appearance. There are 3 stages in money laundering, namely:

- (a) Placement - The physical disposal of proceeds derived from illegal activities;
- (b) Layering – Separating the illicit proceeds from their sources through transactions that disguise the audit trail and provide anonymity; and
- (c) Integration – Integrating the laundered proceeds into the economy as normal funds.

1.1.2. Section 3(1) of the AMLA, defines “money laundering” as the act of a person who:

- (a) engages, directly or indirectly, in a transaction that involves proceeds of any unlawful activity;
 - (b) acquires, receives, possesses, disguises, transfers, converts, exchanges, carries, disposes, uses proceeds of any unlawful activity; or
 - (c) conceals, disguises or impedes the establishment of the true nature, origin, location, movement, disposition, title of, rights with respect to, or ownership of, proceeds of any unlawful activity;
- where –
- as may be inferred from objective factual circumstances, the person knows or has reason to believe, that the proceeds and/or property is proceeds from any unlawful activity; or
 - in respect of the conduct of a natural person, the person without reasonable excuse fails to take reasonable steps to ascertain whether or not the proceeds and/ or property is proceeds from any unlawful activity.

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1.2 Financing of Terrorism

- 1.2.1. Financing of terrorism generally refers to carrying out transactions involving funds that may or may not be owned by terrorist, or that have been, or are intended to be, used to assist the commission of terrorism.
- 1.2.2. Section 3(1) of the AMLA defines a “terrorism financing offence” as any offence under section 130N, 130O, 130P or 130Q of the Penal Code. Essentially, financing of terrorism includes:
- (a) providing or collecting proceeds and/or property for carrying out an act of terrorism;
 - (b) providing services for terrorism purposes;
 - (c) arranging for retention or control of terrorist proceeds and/or property; or
 - (d) dealing with terrorist proceeds and/or property.
- 1.2.3. In the financing of terrorism, the focus is on the determination or use of funds, which may have been derived from legitimate sources.

2.0 CUSTOMER ACCEPTANCE POLICY

2.1 General

- 2.1.1. MDV has developed a customer acceptance policy and procedures to address the establishment of business relationship with the customer. For this purpose, MDV shall identify and assess risk of customers, that is, risk profiling, especially in identifying the type of customers associated with high risk of money laundering and financing of terrorism.
- 2.1.2. Reflective of the risk profiling conducted, MDV should have a reasonable measures in its internal policies and procedures, including customer due diligence, to address the different risks posed by each type of customer.

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2.2 Risk Profiling

2.2.1. In creating the risk profile of a particular customer or type of customer, MDV shall take into consideration the following factors:

- (a) the origin of the customer and location of business;
- (b) background or profile of the customer;
- (c) nature of the customer's business;
- (d) structure of ownership for a customer; and
- (e) any other information suggesting that the customer is of higher risk.

2.2.2. Following the initial acceptance of the customer, MDV shall continuously monitor each customer's transaction activity pattern to ensure it is in line with the customer's profile. Unreasonable differences should prompt MDV to reassess the customer's risk profile.

3.0 CUSTOMER DUE DILIGENCE (CDD)

3.1 General

3.1.1. MDV shall conduct customer due diligence and obtain satisfactory evidence and properly establish in the report, the identity and legal existence of any company applying to do business with MDV. Such evidence must be substantiated by reliable and independent source documents.

3.1.2. MDV shall conduct customer due diligence, when:

- (a) establishing business relationship with any customer;
- (b) carrying out cash or occasional transaction that involves a sum in excess of the amount specified by Bank Negara Malaysia under its sectoral guideline or relevant circular;
- (c) it has any suspicion of money laundering or financing of terrorism; or
- (d) it has any doubt about the veracity or adequacy of previously obtained information.

3.1.3. The customer due diligence undertaken by MDV shall comprise the following:

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- (a) identify and verify the customer;
- (b) identify and verify beneficial ownership and control of a customer;
- (c) obtain information on the purpose and intended nature of the business relationship/ transaction; and
- (d) conduct on-going due diligence and scrutiny, to ensure the information provided is updated and relevant.

3.1.4. Unwillingness of the customer to provide the information requested and to cooperate with MDV's customer due diligence process may itself be a factor of suspicion.

3.1.5. MDV shall not commence business relation or perform any transaction, or in the case of existing business relation, it should terminate such business relation if the customer fails to comply with the customer due diligence requirements and consider lodging a suspicious transaction report with the Financial Intelligence Unit in Bank Negara Malaysia.

3.2 Individual Customers

3.2.1. In conducting due diligence on an individual, MDV should obtain from the individual at least the following information:

- (a) full name;
- (b) NRIC/passport number;
- (c) permanent and mailing address;
- (d) date of birth; and
- (e) nationality.

3.2.2. MDV shall substantiate the above required information by requiring the individual to furnish the original and make a copy of the following documents:

- (a) NRIC for Malaysian/permanent resident; or
- (b) Passport for foreigner.

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3.2.3. Where there is any doubt, MDV should request the individual to produce other supporting identification documents, preferably bearing a photograph of the person, issued by an official authority, to enable the person's identity to be ascertained.

3.3 Corporate Customers

3.3.1. In conducting customer due diligence on a corporate customer, MDV should require the company/business to furnish the original and make a copy each of the following documents:

- (a) Memorandum/Article/Certificate of Incorporation/ Constitution;
- (b) Identification document of Directors/ Shareholders/ Partners;
- (c) Authorisation for any person to represent the company/ business; and
- (d) Identification document of the person authorised to represent the company/ business in its dealing with MDV.

3.3.2. Where there is any doubt, MDV should:

- (a) conduct a basic search or enquiry on the background of such company/ business to ensure that it has not been, or is not in the process of being, dissolved or liquidated; and
- (b) verify the authenticity of the information provided by the company/ business with the Companies Commission of Malaysia.

3.3.3. MDV should also know the beneficial owners and control structure of the corporate customers and determine the source(s) of funds of the company/business in order to ascertain any suspicion concerning the changes to the company/ business structure or ownership or the payment profile of its account.

3.3.4. In the event, MDV's corporate customer is a public company which is subjected to regulatory disclosure, it would not be necessary for MDV to identify or verify the identity of any shareholder.

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3.4 Beneficial Ownership and Control

3.4.1. MDV should conduct customer due diligence on any natural person who ultimately owns or controls the customer's transaction if it suspects a transaction is conducted on behalf of a beneficial owner and not the customer who is conducting such transaction.

3.4.2. The customer due diligence conducted should be as stringent as that for individual. In the event, the beneficial owner is identified as a politically exposed person (PEP) based on the MDV's credit policy, the requirement under paragraph 3.7 would apply.

3.5 Reliance on Intermediaries for CDD

3.5.1. If MDV uses the services of intermediaries to introduce business may rely on the customer due diligence conducted by such intermediaries. However, the ultimate responsibility of customer due diligence remains with MDV.

3.5.2. In facilitating effective oversight, the relationship between MDV and its intermediaries should be governed by an arrangement/agreement that clearly specifies the rights, responsibilities and expectations of all parties. At the minimum, MDV must be satisfied that the intermediary:

- (a) has an adequate customer due diligence process;
- (b) has a reliable mechanism to verify customer identity; and
- (c) can provide the customer due diligence information and make copies of the relevant documentation available immediately upon request.

3.5.3. In addition, customer due diligence procedures should be performed, either on MDV's own records or via copy of records obtained from the introducing entity.

3.6 Non-face-to-face Business Relationship

3.6.1. MDV should pay special attention in establishing and conducting business relationship via information communication technology, for example, the internet,

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post, fax or telephone. Any business relationship/transaction that avoids face-to-face contact without proper customer identification and verification may be subject to abuse by money launderers and financiers of terrorism in gaining access to the economic system.

3.6.2. In this case, MDV should only establish business relationship upon completion of the customer due diligence process conducted through face-to-face interaction.

3.6.3. MDV should also establish appropriate measures for customer verification that should be as stringent as that for face-to-face customers and implement monitoring and reporting mechanisms to identify potential money laundering and financing of terrorism activities.

3.7 Politically Exposed Persons (PEPs)

3.7.1. PEPs are individuals (also includes foreign PEPs) being, or who have been, entrusted with prominent public functions, such as heads of state or government, politicians, government officials, judicial or military officials and senior executives of public organisations. *(Note: for a comprehensive definition on PEPs, kindly refer to Integrity & Anti-Corruption SOP under the heading "Dealing with Public Officials").*

3.7.2. The concern placed in dealing with PEPs lies with the possibility of such PEPs abusing their public powers for their own illicit enrichment.

3.7.3. Hence, MDV, in addition to the respective customer due diligence process, must adhere to the credit policy to determine whether current or new customers are PEPs. In establishing whether or not the customer is a PEP, MDV should gather sufficient and appropriate information from the customer and through publicly available information.

3.7.4. Once a PEP is identified, MDV shall take reasonable and appropriate measures to establish the source of wealth and funds of such person.

3.7.5. The decision to enter into or continue business relationships with PEPs should be made by the Senior Management.

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3.7.6. In addition, MDV shall conduct enhanced ongoing due diligence on PEPs throughout its business relationships with such PEPs. For such purpose, MDV shall note that business relationships with family members or close associates of PEPs involve similar reputational risks to those with PEPs themselves.

3.8 Higher risk customers

3.8.1. For higher risk customers, MDV shall conduct enhanced customer due diligence.

3.8.2. Enhanced due diligence should include at least:

- (a) Obtaining more detailed information from the customer and through publicly available information, in particular, on the purpose of transaction and source of funds; and
- (b) Obtaining approval from the Senior Management before establishing the business relationship with the customer.

3.8.3. Examples of higher risk customers are:

- (a) High net worth individuals;
- (b) Non-resident customers;
- (c) From locations known for their high rates of crime (for example, drug producing, trafficking, smuggling);
- (d) Countries or jurisdictions with inadequate AML/CFT laws and regulations such as the NCCT;
- (e) PEPs;
- (f) Legal arrangements that are complex – (for example, trust, nominee);
- (g) Cash based businesses; and
- (h) Unregulated industries.

3.9 Existing customers

3.9.1. MDV shall take the necessary measures to ensure that the record of existing customers, including its customer's profile remains updated and relevant. In

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addition, further evidence in identifying the existing customers should be obtained to ensure compliance with MDV's current customer due diligence standards.

3.9.2. MDV shall conduct regular reviews on existing records of customers, especially when:

- (a) a significant transaction is to take place;
- (b) there is a material change in the way the account is operated;
- (c) the customer's documentation standards change substantially; or
- (d) it discovers that the information held on the customer is insufficient.

3.9.3. In circumstances other than those mentioned in paragraph 4.9.2., MDV may require additional information consistent with the MDV's current customer due diligence standards from those existing customers that are considered to be of higher risk.

4.0 RECORD-KEEPING

4.1 Retention Period

4.1.1. MDV shall keep all records and documents of transactions, in particular, those obtained during customer due diligence procedures, for at least seven years after the transaction has been completed or after the business relations with the customer have ended.

4.1.2. In situations where the records are subject to ongoing investigations or prosecution in court, they shall be retained beyond the stipulated retention period until it is confirmed by the Financial Intelligence Unit in Bank Negara Malaysia or the court, that such records are no longer needed.

4.2 Audit Trail

4.2.1. MDV shall ensure that the retained documents and records are able to create an audit trail on individual transactions that are traceable by Bank Negara Malaysia, the relevant supervisory and law enforcement agencies.

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4.2.2. In addition, the records kept must enable MDV to establish the history, circumstances and reconstruction of each transaction. The records shall include at least:

- (a) the identity of the customer;
- (b) the identity of the beneficiary;
- (c) the type of transaction (for example, payment or disbursement);
- (d) the form of transaction (for example, by cheque or telegraphic transfer);
- (e) the instruction and the origin and destination of fund transfers; and
- (f) the amount and type of currency.

4.3 Format

4.3.1. MDV shall retain the relevant document in the form that is acceptable under Section 3 of the Evidence Act 1950, secure and retrievable, upon request, in a timely manner.

5.0 ONGOING MONITORING

5.1 General

5.1.1. MDV shall conduct ongoing customer due diligence to examine and clarify the economic background and purpose of any transaction or business relationship that appears unusual, does not have any apparent economic purpose or the legality of such transaction is not clear especially with regards to complex and large transactions or higher risk customers.

5.1.2. An effective customer due diligence process would enable MDV to detect related money laundering and financing of terrorism transactions at the point of customer contact (based on the front-line staff's ad hoc report). Generally, most detection would be made through analysing the transaction patterns or activities of the customer.

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5.2 Special Attention

- 5.2.1. MDV had establish internal criteria (“red flags”) to detect suspicious transactions. This should prompt MDV to conduct enhanced due diligence if any transaction matched the “red flags” list. Transactions that matched the “red flags” should be subjected to ongoing monitoring.
- 5.2.2. MDV shall also conduct ongoing due diligence or monitoring of transactions with regards to business relationships and transactions with individuals, businesses, companies and financial institutions from countries which have insufficiently implemented the internationally accepted AML/CFT measures, such as the NCCT published on the FATF website (http://www.fatfgafi.org/NCCT_en.htm). Such business relationships and transactions would require MDV to make further enquiries, as detail as possible, about their background and purpose and to document the findings in writing. These findings should be made available to the Financial Intelligence Unit in Bank Negara Malaysia and the relevant supervisory authority if required.

6.0 SUSPICIOUS TRANSACTION REPORTING

6.1 General

- 6.1.1. MDV shall submit a suspicious transaction report to the Financial Intelligence Unit in Bank Negara Malaysia when any of its employees suspect or have reason to suspect that the transaction or attempted transaction involves proceeds from an unlawful activity or the customer is involved in money laundering or financing of terrorism.

6.2 Reporting mechanisms

- 6.2.1. The Head of Risk shall be the compliance officer responsible for the submission of suspicious transaction reports to the Financial Intelligence Unit in Bank Negara Malaysia. The appointed compliance officer is the single point of reference for the Financial Intelligence Unit in Bank Negara Malaysia with regards to AML/CFT matters.

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- 6.2.2. Upon receiving any internal suspicious transaction report, the compliance officer shall evaluate the grounds for suspicion and if suspicion is confirmed, promptly submits the suspicious transaction report to the Financial Intelligence Unit in Bank Negara Malaysia. In the case where the compliance officer decides that there are no reasonable grounds for suspicion, he should document his decision, ensure it is supported by the relevant documents and file the report.
- 6.2.3. The compliance officer shall ensure that the suspicious transaction report is submitted within the next working day, from the date the compliance officer establishes the suspicion. In the course of submitting the suspicious transaction report, utmost care must be undertaken to ensure that such reports are treated with the highest level of confidentiality. Hence, the compliance officer must be given the independence to report suspicious transactions to the Financial Intelligence Unit in Bank Negara Malaysia without the need to go through any elaborate approval process.
- 6.2.4. The compliance officer is authorised to cooperate with the Financial Intelligence Unit in Bank Negara Malaysia in providing such additional information and documentation as it may request and to respond promptly to any further enquiries with regards to any suspicious transaction report.
- 6.2.5. The suspicious transaction reporting mechanism shall be operated in a secured environment to maintain confidentiality and preservation of secrecy. Except for the purposes permitted in Section 79 of the AMLA, the disclosure of any information or matter which has been obtained by any person within MDV, in the performance of his duties or the exercise of his functions is an offence under the AMLA.

6.3 Other issues

- 6.3.1. The compliance officer shall maintain a complete file on all internally generated suspicious transaction reports and any supporting documentary evidence regardless that such reports have been submitted to the Financial Intelligence Unit in Bank Negara Malaysia.
- 6.3.2. All its employees involved in conducting or facilitating the customer's transaction must be aware of these reporting procedures and that failure to report suspicious

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transaction when they have reasonable grounds to believe that the transaction is “suspicious” is an offence under the AMLA.

7.0 COMBATING THE FINANCING OF TERRORISM

- 7.1. The existing suspicious transaction reporting system and mechanism for the identification of suspicious transactions are also extended to cover financing of terrorism.
- 7.2. MDV shall compile a database of suspected individuals or companies involved in financing terrorism and shall ensure that the information contained in the database are updated and relevant, and made easily accessible to its employees for the purpose of identifying suspicious transactions.
- 7.3. MDV shall conduct regular checks on the names of new and existing customers against the names in the database. If there is any name match, MDV shall take reasonable and appropriate measures to verify and confirm the identity of its customer. If the customer’s name fully matches any name in the database, MDV shall immediately:
- (a) inform the Financial Intelligence Unit in Bank Negara Malaysia;
 - (b) reject the customer, if the transaction has not commenced; and
 - (c) freeze the customer’s transaction, if it is an ongoing customer. Where MDV suspects that a transaction is terrorist related, it should make a suspicious transaction report to the Financial Intelligence Unit in Bank Negara Malaysia.

8.0 AML/CFT COMPLIANCE PROGRAMME

8.1 Policies, Procedures and Controls

- 8.1.1. The Management must be aware of the money laundering and financing of terrorism risks associated with all its business products and services and understand the AML/CFT measures required by law, regulations, guideline and the industry standards and best practices as well as the importance of implementing AML/CFT

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measures to prevent it from being abused by money launderers and financiers of terrorism. It is the duty of the Management to maintain adequate oversight of the overall AML/CFT measures undertaken by MDV and the duty of the Senior Management to ensure that the Board of Directors is updated with timely information.

8.1.2. The Board of Directors are fully committed in establishing an effective internal control system for AML/CFT. It is the responsibility of the Senior Management to ensure such internal controls are in place and implemented effectively, including the mechanism to monitor and detect complex and unusual transactions.

8.1.3. The Board of Directors will set minimum standards and approve the guideline regarding AML/CFT measures, including those required for customer acceptance policy, customer due diligence, record-keeping, ongoing monitoring, reporting of suspicious transactions and combating the financing of terrorism. The Senior Management in relation to this will ensure that such procedures are formulated and effectively implemented.

8.1.4. The Senior Management is responsible for implementing the necessary changes to the AML/CFT policies and procedures to ensure that the current policies are sound and appropriate.

8.2 Compliance Officer

8.2.1. The compliance officer should ensure the following:

- (a) MDV's compliance with the AML/CFT requirements;
- (b) implementation of the AML/CFT guideline;
- (c) the appropriate AML/CFT procedures, including customer acceptance policy, customer due diligence, record-keeping, ongoing monitoring, reporting of suspicious transactions and combating the financing of terrorism are implemented effectively;
- (d) the AML/CFT mechanism is regularly assessed to ensure that it is effective and sufficient to address any change in money laundering and financing of terrorism trends;

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- (e) the channel of communication from the respective employees to the compliance officer is secured and that information is kept confidential; and
- (f) all employees are aware of MDV's AML/CFT measures, including guideline, control mechanism and the channel of reporting;

8.3 Staff Training and Awareness Programmes

- 8.3.1. MDV shall conduct awareness programmes on AML/CFT practices and measures for its employees, in particular, 'front-line' staff and officers in charge of processing and accepting new customers as well as staff responsible to monitor transactions.
- 8.3.2. The Senior Management shall ensure that proper channel of communication is in place to effectively communicate to all levels of employees the AML/CFT policies and procedures. The employees should be made aware that they may be held personally liable for any failure to observe the internal AML/CFT requirements.
- 8.3.3. In this regard, MDV shall make available its AML/CFT measures for all employees and its documented AML/CFT measures should at least contain the following:
 - (a) The relevant guideline on AML/CFT issued by Bank Negara Malaysia; and
 - (b) MDV's internal AML/CFT guideline.

8.4 Independent Audit

- 8.4.1. The Management is responsible for ensuring regular independent audit of the internal AML/CFT measures to determine their effectiveness and compliance with the AMLA, the AMLA Regulations and the relevant guideline on AML/CFT issued by Bank Negara Malaysia as well as the requirements of the relevant laws and regulations of other supervisory authority, if any.
- 8.4.2. The roles and responsibilities of the auditor are clearly defined and documented. The roles and responsibilities of the auditor should at least include:
 - (a) checking and testing the compliance with, and effectiveness of, the AML/CFT guideline, procedures and controls; and

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- (b) assessing whether current measures are in line with the latest developments and changes of the relevant AML/CFT requirements.

- END OF GUIDELINE -