



**! FOR COMPLETION BY THE APPLICANT IN ENGLISH !**

(PLEASE USE BLOCK CAPITALS THROUGHOUT)

**PLEASE NOTE: Applications will only be accepted from applicants who are shareholders of SUISSE BANK PLC.**

**I – APPLICANT DETAILS**

<b>GENERAL INFORMATION</b>	
Gender:	<input type="checkbox"/> Male <input type="checkbox"/> Female
Title (Mr/Mrs/other):	<input type="text"/>
Surname:	<input type="text"/>
Forename(s):	<input type="text"/>
Date of Birth:	<input type="text"/>
Nationality:	<input type="text"/>
Street / Building No.:	<input type="text"/> <input type="text"/>
Postal Code / City:	<input type="text"/> <input type="text"/>
Country:	<input type="text"/>
Mobile Number:	<input type="text"/>
Phone Number:	<input type="text"/>
Fax Number:	<input type="text"/>
E-mail:	<input type="text"/>

<b>PASSPORT DETAILS</b>	
Passport Number:	<input type="text"/>
Issuing Country:	<input type="text"/>
Expiry Date:	<input type="text"/>
National ID Number:	<input type="text"/>
Issuing Country:	<input type="text"/>
Expiry Date:	<input type="text"/>



**BUSINESS ACTIVITY**

Occupation  
(if retired, please  
state your previous  
occupation):

Employer's Name:

Nature of Business:

Annual Income:

**II – CARD CUSTOMIZATION ELEMENTS**

Business Status:  
(e.g., President)

Authorized Signature:  
(please use BLUE ink)

**III – ADDITIONAL DOCUMENTATION REQUIRED**

1. Scanned colour copy of Passport
2. Scanned colour copy of Government ID  
(Driver's License, etc.)
3. Scanned colour copy of proof of home address not older than 3 months  
(Electricity bill, Telephone bill, etc.)



**IV – CERTIFICATION AND DECLARATION**

I certify with full individual authority that this form and all the documentation required and submitted herewith is true and correct.

SIGNATURE OF APPLICANT:	<input type="text"/>
Date: <input type="text"/>	Place: <input type="text"/>

**The Applicant is a Shareholder of SUISSE BANK PLC at the date of the Application and there has been no material change in the information provided by the Applicant to SUISSE BANK PLC on the Shareholder Application Form. The Applicant is not a resident of the Union of the Comoros.**

**SIGNATURE OF APPLICANT**

**Application for Solid Rose Gold Debit MasterCard received by SUISSE BANK PLC.**

Signature:

Name:

Date:  Place:



**Schedule 1**

**Banking Institution Fees and Charges**

One-Time Solid 14K Gold Debit Card Issuing Fee	25,000 EUR
Annual Debit Card Fee	5,000 EUR
Concierge Lifestyle Service 24/7, 365 days a year	free
Annual Insurance by Lloyds of London to cover a card replacement	free
Card Replacement Fee * <i>* 1st replacement within a 12-month period is covered by Lloyds of London. Additional card replacement will be charged with 20,000 EUR to your account.</i>	free
Secondary Card Fee	on request
Outgoing Wire Fee**	1% of transfer value
Incoming Wire Fee** <i>** All wire transfers are subject to applicable laws and originating/receiving bank restrictions.</i>	0,5% of incoming value but minimum 25 EUR
Foreign Currency Exchange Fee	2,5% of transaction value
Card Cancellation Fee	1,000 EUR

Bank load partners may charge an additional service fee for using their services. Any bank load partner fee amount is an independent fee assessed by each partner only and is not assessed nor controlled by us. If you use an ATM not owned by us for any transaction, including a balance inquiry, you may be charged a fee by the ATM operator even if you do not complete a withdrawal. If you obtain cash from a bank teller, the bank may charge a fee. This ATM fee or bank fee is a third-party fee amount assessed by the individual ATM operator or bank only and is not assessed nor controlled by us. This ATM fee or bank fee amount will be charged to your Card. Note – PaySafe or its affiliates may receive a portion of Card fees and/or interchange fees. If you obtain your funds in a currency or country other than the currency or country in which your Card was issued, the Issuer may increase the currency conversion rate up to an additional 3% and will retain this amount as compensation for its services.

All outlined charges are in Euro. Daily exchange rates are used and charged to your account.

I agree to the Banking Institution Fees and Charges.

SIGNATURE OF APPLICANT

Date:  Place:



## Schedule 2

### **SUISSE BANK PLC (“SB” or the “Banking Institution”) Policy for Combating Financial Crime**

SB is committed to the prevention of financial crime and has adopted procedures to detect and deter money laundering, terrorist financing or other illegal activities.

It is our policy to deter and, where we can, prevent, the use of SB as a conduit for illegal money laundering activities. Our staff can only implement this policy if they understand the background to it and how it works in the context of our day-to-day business. The success of our policy depends on **the vigilance of everyone.**

In order for these policies to be effectively implemented, the Banking Institution and its entire staff need to be:

1. Informed about the **legal and regulatory framework** and the serious legal and regulatory **penalties** for assisting in financial crime – even unwittingly- in every jurisdiction from which we operate;
2. Alert to the **practical methods** by which criminals seek to commit financial crimes;
3. Aware of the need to **report any suspicions promptly** to SB management.

### **Legal and Regulatory Framework**

The Union of the Comoros is a member of Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG).

The purpose of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) is to combat money laundering by implementing the FATF Recommendations. FATF – the Financial Action Task Force – is an inter-governmental body whose purpose is the development and promotion of policies, both at national and international levels, to combat money laundering and terrorist financing.

This effort includes co-ordinating with other international organisations concerned with combating money laundering, studying emerging regional typologies, developing institutional and human resource capacities to deal with these issues, and co-ordinating technical assistance where necessary. ESAAMLG enables regional factors to be taken into account in the implementation of anti-money laundering measures.

ESAAMLG members participate in a self-assessment process to assess their progress in implementing the FATF Forty Recommendations.

The Union of the Comoros is also an observer member of the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) to give support in matters relating to anti-money laundering and combating the financing of terrorism (AML/CFT).

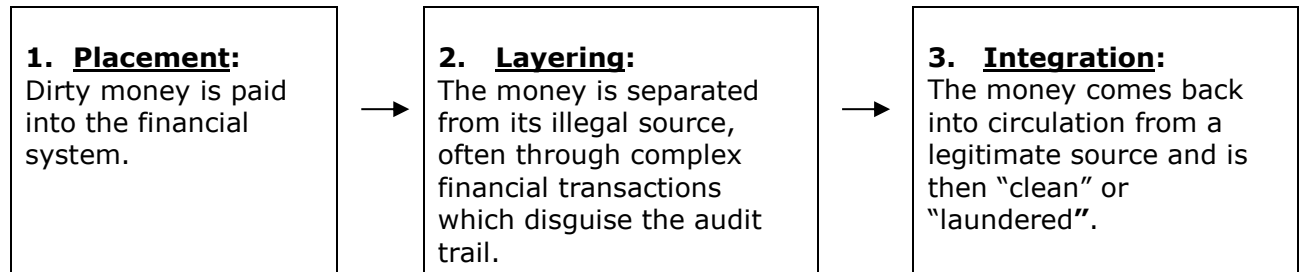
GIABA is an institution of the Economic Community of West African States (ECOWAS) responsible for facilitating the adoption and implementation of Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT) in West Africa. It is also a FATF-Styled Regional Body (FSRB) working with its member states to ensure compliance with international AML/CFT standards.

Further information in this regard which forms the basis of SB’s policy can be found at the below link: [FATF 40 Recommendations and FATF 9 Special Recommendations](#).



## What is Money Laundering?

The process by which criminals attempt to change the identity of "dirty" money (obtained through crime) by "laundering" it so that its true source cannot be traced. Whilst there is no single method of money laundering, there are generally three stages:



Funding or facilitating money laundering and using laundered money are all **criminal offences**. Additional offences connected with money laundering include:

- assisting in;
- concealing;
- tipping off;
- failing to report money laundering.

Any individual can commit these offences if they know (or should have known, measured by the standard of the reasonable person in their position) that the money is from an illegal source. These offences are punishable by unlimited fines and imprisonment.

## The Importance of Know Your Customer ("KYC")

At SB we only offer our services (e.g., issue of guarantees) to legal entities (individuals or corporate) who have become shareholders of SUISSE BANK PLC. A potential shareholder is required to go through a thorough verification exercise so that we can establish that they are legitimate.

Although our shareholders are, in general, introduced through agents, it is SB and not the agent who has the responsibility of verifying the identity and legitimacy of the prospective shareholder. As a number of our agents are located in countries which are regarded for money laundering purposes as higher risk – such as Africa and India – we have adopted a high standard for required documentation before a shareholder application will be accepted. This is detailed in the Shareholder Application Form.

We additionally check all potential shareholder applicants against international sanctions lists. This verification is completed before we accept funds for the purchase of shares.

Our vigilance does not stop upon the admission of a shareholder. Before accepting an application from a shareholder for a guarantee or similar Guarantee, we require documentary proof from the shareholder of the legitimate commercial nature of the business or contract which is to be guaranteed. This is because we recognise that the risk to SB of being used for improper purposes as described in the examples below.



## **Practical Guidance on how to detect and deter Financial Crime**

It is trite (but true) to say that someone who is intent on illegal activity such as money laundering will not introduce themselves to us in those terms. Whilst generalisations are not always useful, red flags to a suspicious transaction or illegal activity can include:

- Lack of obvious commercial rationale
- A “front man” or “front company” who doesn’t appear in the corporate structure
- Lack of documentary support for a person or transaction
- Excessive concern about secrecy, especially surrounding source of funds.

**Example 1:** Imagine that SB is approached by a shareholder (properly verified by us) who now wants a commercial guarantee but cannot produce a third-party contract.

- Before entering into the transaction, we need to verify the legitimacy of the proposed transaction whether directly or through our or their professional advisors.  
**Why?**
- Because the Applicant is keen to enter into a transaction with us to pay a premium for a guarantee but can’t show why he needs it – the transaction doesn’t make obvious commercial sense.

**Example 2:** Imagine that the guarantee is called by the Beneficiary and the Applicant is eager to pre –fund the guarantee in full.

- The Applicant may have spotted a market opportunity that we haven’t seen or is not available to us or they may be “Layering” - using dirty money to buy a clean asset which they can sell on in return for clean money. The Applicant pays SB the guarantee money (which they had all the time); SB pays the Beneficiary with its own clean money and the money is successfully laundered.

## **Record Keeping**

SB recognises the importance of keeping full and accurate records of the steps taken by us to verify our Shareholders and Applicants. All original documentation is maintained in paper or electronic form for as long as a person remains a shareholder and for 6 years thereafter.



### **Reporting Suspicions to Management**

The JMLSG Guidance emphasises the responsibility of senior management in promoting an effective policy of financial crime prevention. At SB, the Money Laundering Reporting Office ("MLRO") is a member of senior management with the specific responsibility of overseeing the implementation of our policies to prevent financial crime. The MLRO reports directly to the Board of SB.

The Banking Institution and each individual member of staff are required by law to report suspicious transactions, via the firm's MLRO, to the UK Financial Intelligence Unit, which is located within the National Crime Agency.

The individual obligation is satisfied by promptly reporting your suspicions to the MLRO.

### **Training for Staff**

SB is responsible for making sure that our staff:

- know what money laundering is and how we might be used to facilitate this,
- understand the need for vigilance in the Shareholder and Applicant take on processes,
- know how to identify and report suspicious transactions.

With this in mind we conduct periodic refresher training for our staff.

The MLRO or other senior management are on hand to answer any questions or deal with concerns on this topic.