



**Head Office**  
Capital Building  
No. 72 Tran Hung Dao Str., Hoan Kiem Dis., Hanoi, SRV  
Telex: (84.4) 39288869 Fax: (84.4) 39288867  
Swift: VPBKVN VX Website: [www.vpb.com.vn](http://www.vpb.com.vn)

## **REGULATION**

### **ON IMPLEMENTING MEASURES OF MONEY LAUNDERING PREVENTION IN VIETNAM PROSPERITY JOINT STOCK COMMERCIAL BANK**

*(No.: 1935/2014/QDi-HDQT dated December 31, 2014 of the Board of Directors)*

#### **THE BOARD OF DIRECTORS**

- Pursuant to the Law on Credit Institutions no. 47/2010/QH12 approved by the National Assembly of Social Republic of Vietnam on June 16, 2010;
- Pursuant to the Law on Prevention of Money Laundering no. 07/2012/QH13 approved by the National Assembly of Social Republic of Vietnam on June 18, 2012;
- Pursuant to the Decree no. 116/2013/ND-CP dated October 4, 2013 of the Government detailing a number of articles of the Law on Prevention of Money Laundering;
- Pursuant to the Circular no. 35/2013/TT-NHNN dated December 31, 2013 of the State Bank of Vietnam guiding implementation of a number of regulations on money laundering prevention;
- Pursuant to the Circular no. 31/2014/TT-NHNN dated November 11, 2014 of the State Bank of Vietnam amending a number of articles of the Circular no. 35/2013/TT-NHNN dated December 31, 2013 guiding implementation of a number of regulations on money laundering prevention;
- Pursuant to the Charter of Vietnam Prosperity Joint Stock Commercial Bank approved by the General Meeting of Shareholders on February 24, 2012;
- Pursuant to the Regulation on organization and operation of the Board of Directors no. 957/2011/QC-HDQT dated July 29, 2011 of the Board of Directors;
- At the proposal of the CEO,

#### **REGULATES:**

#### **CHARTER I**

#### **GENERAL PROVISIONS**

#### **Article 1. Purpose, Subject of adjustment, Scope of application**

##### ***1. Purpose***

The Regulation on implementing measures of money laundering prevention in Vietnam Prosperity Joint Stock Commercial Bank (hereinafter called “VPBank”) is issued for purposes as follows:

- a) Concretizing and guiding to comply with anti-money laundering (AML) laws and regulations within VPBank.
- b) Establishing centralized mechanism of AML under the Head Office of VPBank.
- c) Regulating responsibility and authorization of departments and units of VPBank in implementing AML measures.

## 2. *Subject of adjustment*

This Regulation specifies AML measures and implementation of those measures in transaction on finance and asset between VPBank and its Customer.

## 3. *Scope of application*

This Regulation applies in entire VPBank system.

## Article 2. Explanation of term

In this Regulation, following words and expressions are construed as follows:

1. **Board of Management (BOM)** means the Chief Executive Officer (CEO) and/or Deputy CEO authorized by the CEO to decide AML related matter in VPBank.
2. **Department in charge of AML** means department established by the Board of Directors (BOD) in each period, having responsibility and function of performing AML related tasks in VPBank.
3. **Individual** means officer, staff working in departments and/or units of VPBank.
4. **Competent authority** means the BOD, the chairman of the BOD, the CEO or Deputy CEO, Director of Division/Area/Centre authorized by the CEO in specific case in certain period.
5. **Beneficial owner** means individual owning an account in reality, having dominant right when Customer of VPBank conducting transaction for this individual or individual dominating a legal entity or an investment trust agreement.
6. **Warning list** means list of organizations and individuals with high risk of money laundering established by the State Bank of Vietnam.
7. **Black list** means list of organizations and individuals in connection with terrorism and/or financing terrorism established by the Ministry of Public Security.
8. **Unit** means Division/Centre/Department/Team/Group under the Head Office, Transaction Centre, Branch, Transaction Office, Saving Fund and others established in accordance with VPBank regulation in each period.
9. **Reporting unit** means unit, which conducts transaction directly with Customer or implements several stages in this transaction, detecting case must be reported as specified in this Regulation.
10. **Large amount transaction** means transaction in cash, gold or foreign currencies with (i) its total value being equal to or exceeding the amount specified by the state authority and (ii) its frequency being once or several times in a day.

11. **Suspicious transaction** means transaction having unusual sign or reasonable grounds to suspect the property in the transaction, which has derived from criminal activity or relating to money laundering in connection with laws and this Regulation.
12. **Business operation through introduction** means activity of business between VPBank and its Customer through introduction of an intermediary that is another financial institution in the same group or corporation with its Customer or through organization supplying brokerage service.
13. **Customer** means organization or individual that is using or intends to use product, service provided by VPBank.
14. **Financial Action Task Force** means the inter-governmental body setting standards and promoting effective implementation of legal, regulatory and operational measures for combating money laundering terrorist financing and other related threats to the integrity of the international financial system.
15. **Laws** means current legal documents of Social Republic of Vietnam concerning to AML.
16. **Correspondent banking** means activity of one bank to provide oversea bank with banking service, payment service and other services.
17. **Money Laundering** means legalization of criminal origin of property, including:
  - a) Activities stipulated in the Penal Code.
  - b) Assisting crime related organization or individual in avoiding legal liability by legalizing criminal origin of property.
  - c) Possessing property without regard to the awareness of its criminal origin at time of receipt in order to legalize its origin.
18. **Property** means thing, money, valuable paper and property right under the provisions of the Civil Code.

### **Article 3. Principle of money laundering prevention in VPBank**

1. The prevention of money laundering in VPBank must be implemented in compliance with laws and VPBank regulations on the basis of:
  - a) Ensuring that activity and transaction are conducted normally in VPBank;
  - b) Protecting legitimate right and interest of VPBank in transaction with its Customer;
  - c) Preventing activity as taking advantage of AML to infringe upon legitimate right and interest of VPBank or its Customer.
2. AML measures must be implemented entirely and timely as coordinated by Department in charge of AML.
3. Activity detected as money laundering and/or participating and/or supporting and/or facilitating in money laundering implemented by VPBank Units, officers or staff shall be handled in accordance with VPBank regulations concerned in each period.

### **Article 4. Prohibited acts**

Units and/or Officers/Staff are prohibited from:

1. Organizing, participating, supporting or facilitating money laundering activity.

2. Opening or maintaining anonymous account or account not registered with real name of its holder.
3. Establishing or maintaining business relationship with bank which was established in a country or territory but has no physical presence in that country or territory and is not subject to supervision and management of the competent management body.
4. Taking advantage of authorization in AML to infringe upon or to affect legitimate right and interest of VPBank and/or its Customer.
5. Hindering activity of providing information in AML; Threatening or taking revenge out on person detecting or providing information or reporting for money laundering activity or suspicious transaction.

## **CHARTER II**

### **MEASURES OF MONEY LAUNDERING PREVENTION**

#### **Section 1**

#### **IDENTIFY CUSTOMER AND UPDATE CUSTOMER INFORMATION**

##### **Article 5. Customer identification**

Reporting Unit has to collect information to identify Customer in following cases:

1. Customer opens account including payment account, deposit account, card account or other kinds of account for the first time.
2. Customer sets up relationship with Reporting Unit for the first time in order to use product, service provided by VPBank.
3. Customer conducts irregular transaction with large amount. Irregular transaction with large amount is transaction of Customer having no account at VPBank or having payment account at VPBank but having no transaction within six (06) months or more with its total value being three hundred million (300.000.000) Vietnam dong (VND) or more in a day.
4. Customer conducts electronic remittance but lacking of originator's name, address or account number.
5. Reporting Unit doubts that transaction or parties in transaction relating to money laundering activity.
6. Reporting Unit doubts about accuracy or completeness of Customer identification collected previously.

##### **Article 6. Information on Customer identification**

Information on Customer identification has to have the following main contents:

1. Information on Customer identification
  - a) For Customer as Vietnamese individual: Full name; date of birth; nationality; occupation, position; telephone number; number, date and place of issuance of valid ID card or passport; address of registered permanent residence and current residence.

- b) For Customer as foreign individual: Full name; date of birth; nationality; occupation, position; number, date and place of issuance of valid passport; visa, expired date of visa; address of registered permanent residence abroad and address of registered residence in Vietnam.
  - c) For Customer as stateless individual: Full name; date of birth; occupation, position; visa number; agency issuing visa for immigration; address of registered residence abroad and in Vietnam.
  - d) For Customer as individual having two (02) or more nationalities: in addition to information listed in point (a) and/or point (b) of this clause, Reporting Unit has to collect information on nationalities, registered addresses of residence in countries to which Customer bears nationalities.
  - e) For Customer as organization: Full and abbreviated trading name; address of head office; telephone number, fax number; business line; founder's and representative's information as listed in point (a) and/or point (b) of this clause.
2. Information on Beneficial owner
- a) Reporting Unit has to identify beneficial owner of Customer and to implement measures to identify and to update that beneficial owner's information.
  - b) For Customer as legal entity or Customer providing service of authorization agreement, Reporting Unit has to collect information on ownership and control structure to determine individual having controlling interest and dominating operation of that legal entity or authorization agreement.
  - c) Beneficial owner can be identify basing on following criteria:
    - Individual owning an account or a transaction in reality: Account holder, account co-holder or anyone dominating operation, beneficiary of that account, transaction.
    - Individual dominating a legal entity: Individual holding ten percentage (10%) or more of chartered capital of that legal entity; individual holding twenty percentage (20%) or more of chartered capital of organization contributing ten percentage (10%) or more of that legal entity.
    - Individual dominating an investment entrustment, authorization agreement: Individual entrusting, authorizing; individual dominating other individual, legal entity or organization entrusting, authorizing.
  - d) Identification and verification of beneficial owner's information shall be implemented as specified in clause 1 of this Article. For Customer as foreign organization or organization having one or more capital contributors being foreign individual or organization, Reporting Unit has to verify information on identification of that foreign individual or organization by using material and data issued by foreign competent authorities.
3. Information on Customer's purpose in relationship with Reporting Unit

**Article 7. Update information on Customer identification**

1. Reporting Unit has to update information on Customer identification regularly during the period of establishing and maintaining relationship between VPBank/Reporting Unit and its Customer in order to ensure that transaction being conducted through the Reporting Unit is adequate to information already known on Customer, Customer's business, risks and origin of Customer's property.
2. Reporting Unit has to update information as mentioned in clause 1 of this Article in accordance with ordinary business process or particular method specified by competent authority in each period following the below frequency:
  - a) At least once a year for high risk Customer; or
  - b) When Reporting Unit knows that information on Customer identification changes.

#### **Article 8. Measures to verify information on Customer identification**

1. Reporting Unit verifies information on Customer identification through materials, data as follows:
  - a) For Customer as individual: Valid Identification Card, passport; visa for immigration, permanent residence card, temporary residence card and other documents issued by State agency.
  - b) For Customer as organization: permit or decision for incorporation; decision for name change, division, separation, consolidation, merger; certificate of business registration/certificate of enterprise registration; decision of appointment or labor contract between Customer and its CEO, chief accountant.
2. In business activities as opening and using account, saving, card, credit, funds and others, Customer identification is implemented in accordance with VPBank regulations in each business activity respectively.
3. Reporting Unit can collect information and compare it with information provided by Customer through other organization, individual to which Customer had or having relationship or through management authority or competent State agency.
4. If necessary, Reporting Unit can report to competent authority of VPBank to present a plan of hiring other organization to verify information on Customer identification. In this case, Reporting Unit has to ensure that the hired organization shall (i) comply with regulation on Customer identification and updating information on Customer identification specified in Article 5, 6 and 7 of this Regulation and (ii) be responsible for Customer identification and updating information on Customer identification.

#### **Article 9. Classify Customer according to risk level**

1. Reporting Unit has to classify its Customer on the basis of AML risk level in compliance with Laws and VPBank regulations on Customer identification, updating information on Customer identification and classifying Customer on the basis of AML risk level. If necessary, Reporting Unit can request for assistance from Department in charge of AML.
2. For low risk Customer, Reporting Unit can implement measures to identify its Customer at low level but it has to collect full of its Customer's information as specified in Article 6 of this Regulation.

3. For high risk Customer listed in Articles 10, 11, 12, 13 and 14 of this Regulation, in addition to collecting information on Customer identification as specified in Article 6 of this Regulation, Reporting Unit has to implement intensive measures specified in those Articles respectively.
4. For high risk Customer not listed in clause 3 of this Article, in addition to collecting information on Customer identification as specified in Article 6 of this Regulation, Reporting Unit has to implement intensive measures specified in Article 15 of this Regulation and other regulations of VPBank in each period, if any.

#### **Article 10. Foreign Customer as politically exposed person**

1. Foreign Customer as politically exposed person (PEP) is individual holding senior position in foreign agency and organization concerned.
2. List of foreign individual as PEP
  - a) VPBank applies PEP list provided by the State Bank of Vietnam under electrical data file.
  - b) Department in charge of AML is supposed to register PEP list recipient with the Banking Inspector and Supervision Agency (through AML Department) according to the regulations of the State Bank of Vietnam in each period, which includes but not limited to full name, working address, fax number, phone number and email address after getting official approval by VPBank's authority.
  - c) After receiving PEP electrical data file, Department in charge of AML is supposed to report to the BOM to disseminate the file throughout the whole VPBank's system. Relevant units must not provide information of the list to the third party after receiving the file from Department in charge of AML without permission in writing from the Banking Inspector and Supervision Agency.
3. For Customer as foreign individual as PEP, Reporting Unit has to implement below measures:
  - a) Have to be accepted by the CEO or person authorized by the CEO prior to open account or to establish transaction in case Customer or beneficial owner is defined as PEP.
  - b) Identify origin of Customer's property.
  - c) Strengthen supervision to Customer and business relationship between Reporting Unit and its Customer.
4. Reporting Unit has to implement measures as set in clause 3 of this Article to those Customers are PEP's father, mother, wife/husband, son/daughter, sibling brother/sister.

#### **Article 11. Correspondent banking relationship**

Before establishing correspondent banking relationship with foreign bank, the unit which has function of setting such relationship has to implement the following tasks, measures:

1. Collect foreign bank information, including:
  - a) Information on Customer identification for organization as set at point (e) clause 1 Article 6 of this Regulation.
  - b) Purpose and reason of establishing the relationship.

- c) Name of management agency of that foreign bank.
  - d) Assessment, reputation ranking of that foreign bank issued by competent agency or professional organization.
2. Assess implementation of AML measures through:
    - a) Internal AML regulations
    - b) AML risk management system.
    - c) AML internal control and audit system.

This assessment is conducted in accordance with laws and VPBank regulations in each period.

3. Have to be accepted by the CEO or person authorized by the CEO prior to establish the correspondent banking relationship.
4. In case Customer of foreign bank can transact through its account opened at VPBank, Reporting Unit has to ensure that foreign bank implemented Customer identification, updating information on Customer identification fully and that foreign bank has ability to provide information at the request of VPBank.

#### **Article 12. Transaction relating to new technology**

1. Transaction relating to new technology is transaction using technology which allows Customer to conduct transaction without facing with staff of Reporting Unit directly.
2. In case VPBank provides services relating to new technology, relevant units have to (i) coordinate to face Customer directly upon setting up relationship at the first time and (ii) request Customer to provide information as set in Article 6 of this Regulation.
3. For the transaction relating to new technology, Reporting Unit has to implement following tasks:
  - a) Detect and prevent using new technology in money laundering activities.
  - b) Manage money laundering risk when transacting with Customer using new technology and face-to-face manner not required.
4. Department in charge of AML is responsible as contact point to coordinate with Risk Management Division and other relevant units to elaborate internal regulation, process and guidance to implement tasks in connection with managing money laundering risk in transaction relating to new technology. Those regulations have to have at least the following contents:
  - a) Define and simulate the money laundering risk which may arise in transaction relating to new technology.
  - b) Stipulate adequate measures to prevent and minimize money laundering risk which may arise.

#### **Article 13. Special supervision for several transactions**

1. Reporting Unit has to implement special supervision for several transactions as follows:
  - a) Unusual large amount or complicated transaction is specified by laws and VPBank regulations in each period, in which:



- *Unusual large amount transaction* means transaction which is clearly not adequate to Customer's income or not suitable to amount of usual transaction of Customer at Reporting Unit.
  - *Complicated transaction* means transaction conducted through method not sufficient to nature of transaction, for instance: transaction conducted through many intermediaries and many accounts not necessary; transaction conducted between many different accounts of one holder but in different areas; or any transaction detected by Reporting Unit that it is not ordinary and needs strict supervision.
- b) Transaction with organization, individual in country, territory listed by FATF to counter money laundering or Warning list or other list delivered by the BOM.
2. Reporting Unit has to check legal background and purpose of transaction; in case Reporting Unit doubts about honesty and purpose of the transaction, Reporting Unit has to prepare suspicious transaction report and send this report to the BOM (through the Department in charge of AML). In this case, after reporting that suspicious transaction, Reporting Unit has to handle this transaction as per opinion of the BOM.

**Article 14. Business operation through introduction**

1. Reporting Unit can identify its Customer through intermediary when conducting business operation through introduction and ensure the following requirements:
- a) The intermediary has to collect, maintain and provide information on Customer identification to VPBank timely and fully.
  - b) If the intermediary is Vietnamese organization then this organization has to be subject managed and supervised by Vietnamese competent authority and has to perform Customer identification and update information on Customer identification as set in Article 5 and Article 7 of this Regulation as well as requirement on maintaining reporting material, documentation as set in Article 21 of this Regulation.
  - c) If the intermediary is foreign organization then this organization has to be subject managed and supervised by competent authority, has to perform Customer identification, update information on Customer identification and maintain documentation as specified by laws of country where its Head Office registered or its main business operated. In case laws of this country has not yet satisfied or satisfied partly with requirements of recommendations of the Financial Action Task Force, Reporting Unit has to coordinate with other relevant units to do research in order to report to competent authority of VPBank for acknowledging and considering risk element to decide whether VPBank shall rely on this foreign intermediary or not.
  - d) If the intermediary is a unit belonging to financial group implementing completely requirements set in point (b) and point (c) of this clause then the intermediary shall be considered as complying fully with those regulations.
2. Reporting Unit shall not be exempted from liability of Customer identification and updating information on Customer identification if those tasks implemented through intermediary.

**Article 15. Enhanced due diligence for Customer with high risk of AML**

For Customer with high risk of AML that not covered by Articles 10, 11, 12, 13 and 14 of this Regulations, further to identifying as specified in Article 6 of this Regulation, Reporting Unit has to implement the following intensive measures:

1. Have to obtain approval of management authority of at least one level higher than the approving authority applied for ordinary case when Customer setting up relationship for the first time or existing Customer assessed and classified as high risk Customer. For existing Customer classified as high risk after being assessed or reassessed, Reporting Unit has to report to competent authority to approve or reapprove the relationship with this Customer and then Reporting Unit has to implement intensive measures set in below clause 2 and clause 3 of this Regulation.
2. Collect additional information as follows:
  - a) For Customer as individual
    - Monthly average revenue of Customer within three (03) latest months.
    - Full name, address, telephone number of agency, organization or owner of enterprise where Customer working or having major revenue.
  - b) For Customer as organization
    - Business line which contributing major revenue.
    - Financial statements of the last two (02) years.
    - List (including full name and permanent address) of members of Board of Directors, Board of Management, Chief Accountant or equivalent).
    - Full name, address, legal or authorized representative (if Customer is a subsidiary company) or list of full name, address, legal or authorized representative from branch, subsidiary company, representative office (if Customer is a parent company).
3. Strictly supervise transaction of high risk Customer as set in clause 1 Article 13 of this Regulation to ensure that Customer's transaction is appropriate to essence, goal of establishing relationship and operation of Customer; timely detect unusual transactions and examine suspicious transactions under sufficient basis in accordance with the law.
4. Update information at least once a year or when Reporting Unit notices any change from Customer information.

## **Section 2**

### **REPORT, PROVIDE AND RETAIN INFORMATION**

#### **Article 16. Report on large amount transaction**

1. Value of transaction that has to be report is determined by laws.
2. Reporting Unit is responsible to report to the BOM (through the Department in charge of AML) when conducting large amount transaction in accordance with process and manner stipulated by VPBank in each period.
3. Department in charge of AML is the unit reporting large amount transaction of VPBank to the State Bank of Vietnam as stipulated by VPBank in each period.

4. In case Customer paying large cash amount in foreign currency to purchase Vietnam dong or paying large cash amount in Vietnam dong to purchase foreign currency, it is only the payment transaction of Customer shall be reported.
5. Reporting Unit has to monitor and screen large amount transactions in cash to detect suspicious transaction timely.

**Article 17. Report on suspicious transaction**

1. Reporting Unit is responsible to report to the BOM (through the Department in charge of AML) when it doubts or has reasonable basis to doubt that asset in transaction (i) acquired from criminal activity or (ii) relating to money laundering, in which:
  - a) *The reasonable basis to doubt that asset in transaction acquired from criminal activity* includes: Transaction is requested to implement by accused or defendant or person convicted in accordance with criminal procedure laws and asset in that transaction originated from ownership or control of that person or individual, organization relating to that person during or after criminal activity being conducted.
  - b) *The reasonable basis to doubt that asset in transaction relating to money laundering* is resulted from considering and analyzing suspicious signs as set in clause 4 of this Article.
2. Suspicious transaction has to be reported regardless of its amount and whether it has completed or not yet or it has just been intended to conduct.
3. Suspicious transaction is reported following form as issued by VPBank competent authority in each period.
4. Suspicious signs include:
  - a) Customer provides incorrect, incomplete and inconsistent information on identification.
  - b) Customer persuades Reporting Unit not to report transaction to the competent authority of VPBank or State agency.
  - c) VPBank is unable to identify Customer by information provided by Customer or transaction relates to a party whose identity cannot be identified.
  - d) Customer uses many different addresses for the same name; it is impossible for VPBank to connect to Customer's personal or office telephone or these telephone numbers do not exist after account is opened or transaction is conducted.
  - e) Occupation provided by Customer is not adequate to business level, activity and type of account.
  - f) Customer is an enterprise or entity having financial statements or dossier different from those of other enterprise, entity having similar features.
  - g) Transaction is conducted by the order or under the authorization of the organization or individual in the warning list.
  - h) Beneficiary of T/T remittance is in relation to a group of persons in many countries involving in terrorist activities.

- i) Through information on Customer identification or reviewing economic and legal basis of transaction, VPBank is able to define the relation between parties conducting such transaction with criminal activity or with organization or individual in black list, warning list.
- j) Customer is organization or individual entering into transaction with large amount of money incommensurate with or not relevant to their routine activities, not adequate to financial ability, business demand, activities or any lawful activities of such organization or individual.
- k) Customer has suspicious attitude: Paying unusual curiousness, attention to the internal control system and policies of VPBank, asking for remittance limit; trying to develop close relationship with VPBank staff; or showing the worriment, not keeping calm during transaction period; or requesting to quickly conduct the transaction and having doubtful presence, attitude.
- l) Customer's transaction is performed through Reporting Unit in improper process and procedure as prescribed by laws and by regulation, guidance of VPBank.
- m) There are sudden changes of transaction turnover in account; money deposited in and withdrawn quickly from account; transaction turnover is large in a day but account balance is negligible or zero.
- n) Transactions of transferring small amounts of money from different accounts into a large amount of money or through different accounts to a single account within a short period or vice versa; money crookedly transmitted through many accounts; involved parties do not care about transaction charges; conduct many transactions and each transaction amount is nearly with reporting high-value rate.
- o) Customer requires T/T remittance with the value smaller than that to be reported in order to avoid reporting on cash transaction.
- p) Customer using Letters of Credit and other commercial financing instruments of high value and at high discounts (to transfer money between countries while these transactions are not related to routine activities of Customer).
- q) Customer opening many accounts at VPBank in geographical areas different from place where Customer is residing, working or doing business activities.
- r) The Customer's account at VPBank having no activity over a year and has activity back without plausible reasons; Customer's account suddenly receives a cash deposit or money transfer of large value without usual transaction.
- s) Customer transferring money to non-profit organization and then this amount is used to finance unclear purpose activity.
- t) Customer as enterprise transferring a large amount of money from account opened at VPBank overseas after receiving many small amounts of money transferred by electronic money transfer, checks or drafts.
- u) Customer as enterprise having foreign investment capital transfers money overseas immediately after receiving the investment capital or transfer money overseas not in accordance with the business activities; foreign enterprise transferring money

overseas immediately after receiving money from abroad transferred into account opened at foreign credit organization, bank branch operating in Vietnam.

- v) Customer usually changes money with small value into larger value; or deposit/withdraw cash of the amount just below the limit requiring report at periodical time or conduct many transactions in a day or several days.
  - w) Customer usually conducts transactions of remittance with large amount to or from abroad without clear economic reason.
  - x) Transaction of deposit, withdrawal or transfer of money conducted by organization or individual associated with crimes generating illegal property published on mass media.
  - y) Customer requests to borrow the maximum amount allowed based on contract of single-premium right after the premium payment, except for the case required by VPBank.
  - z) Information on origin of property used for financing, investment, loan, financial leasing or investment trust of Customer is not clear and transparent.
  - aa) Information on origin of security property of Customer asking for capital loan is not clear and transparent.
  - bb) Customer pays the loan without prior notice, especially for problematic loans without clearly explanation about the origin of the debt payments.
  - cc) Insurance company regularly pays indemnities or insurance sums in large amounts of money to one of its customer.
  - dd) Securities organization transfers money not in accordance with their securities trading activities.
  - ee) Any other transactions which deemed abnormal or having unreliable legal background.
5. In actual operation, Reporting Unit has to report to the BOM (through Department in charge of AML) as regulated in Clause 1 of this Article in case it detects the suspicious sign further to the signs listed in clause 4 of this Article.

#### **Article 18. Report on electronic money transfer transaction**

Department in charge of AML is responsible to prepare report on the transaction of electronic money transfer exceeding the value rate prescribed by the State Bank of Vietnam and by VPBank in each period.

#### **Article 19. Report form**

1. Reporting Unit sends the electronic data files or reports in writing to the BOM (through Department in charge of AML) in accordance with VPBank regulations in each period.
2. In necessary case, Reporting Unit can report to the BOM (through Department in charge of AML) via fax, phone, and e-mail but has to (i) ensure the safety and security of the reporting data information and (ii) confirm in writing with Department in charge of AML.
3. For suspicious transaction report, Reporting Unit has to attach (i) documents of account opening for transaction conducted through account, (ii) information on Customer identification, (iii) document and other material relating to that suspicious transaction, the prevention measures carried out.

4. Department in charge of AML is responsible to be the contact point for registering in writing with the Anti-money Laundering Office the following information on the officer in charge of sending the report by electronic data files: Full name, position, address of workplace, telephone number and e-mail address, and has to notify in writing any change in such information or replacement of these officers.

**Article 20. Report time limit**

Department in charge of AML has to report to the State Bank of Vietnam within time limit as follows:

1. For large amount transaction and electronic money transfer transaction of VPBank:
  - a) Report daily, under the regulations of the State Bank of Vietnam, for report in electronic data files on information technology system connecting between VPBank and the State Bank of Vietnam.
  - b) Report within two (02) working days from the date of the transaction for report in writing form or other report forms.
2. For suspicious transaction:
  - a) Reporting Unit has to report to the BOM (through Department in charge of AML) within maximum twenty four (24) hours from the time transaction generated.
  - b) Within maximum twenty four (24) hours from the time of receiving the report set in point (a) clause 2 of this Article, on the basis of the suspicious transaction report drafted by Department in charge of AML, the BOM has to consider and decide whether to report or not to report to competent state agency about suspicious transaction reported by Reporting Unit.
  - c) Time limit of sending report on suspicious transaction is defined from time of transaction arising. If Reporting Unit detects suspicious sign of a transaction which has been performed before the time limit of reporting as prescribed, it still has to send report on suspicious transaction immediately in the day of detecting such suspicious sign. Day of detecting suspicious signs is defined on day when the Reporting Unit detected by itself or compulsorily detected suspicious sign as considered according to actual and objective circumstance when such suspicious transaction happened.
3. For transaction having sign relating to crime
  - a) Reporting Unit has to report immediately to the BOM (through Department in charge of AML) as soon as it detects that transaction requested by Customer having sign relating to crime.
  - b) On the basis of draft of report of transaction having sign relating to crime composed by Department in charge of AML, the BOM has to consider and decide whether to report or not to report the State bank of Vietnam and competent state agencies in accordance with the regulations of Laws and VPBank. The competent state agencies include Public Security agency or People's Procuracy at district level or higher where such transaction detected.

- c) Time limit to send report on transaction having sign relating to crime is defined on working day when Reporting Unit detects or compulsorily detects sign relating to crime as considered to actual circumstance when such transaction happened.

**Article 21. Time limit for retention of document and report**

Reporting Unit and Department in charge of AML are responsible to retain document and report according to time limit as follows:

1. For the document on customer's transaction relating to AML activity: at least five (05) years from the date the transaction generated;
2. For document on Customer identification, accounting documentation and reports specified in Articles 16, 17 and 18 of this Regulation and relevant materials: at least five (05) years from the closing date of transaction or the date of closure of account or the reporting date.

**Article 22. Ensure the secrecy of report information and material**

1. Information, document and other material in relation with transaction which has to be reported under this Regulation are retained in according to the "Confidential" regime and given to competent state agency and competent authority of VPBank only according to laws and internal regulation of VPBank.
2. Reporting Unit is not allowed to disclose to any other third party information on reporting of suspicious transaction or relevant information reported to competent authority of VPBank.

**Article 23. Report on money laundering activity for financing terrorism**

1. *Money laundering act with aim to finance terrorism* means an act of organization or individual aiming to legalize origin of asset acquired from criminal activity in order to finance terrorism organization or individual or to finance terrorism act.
2. After detecting transaction conducted by organization or individual included in blacklist or when having clear evidence that other organization or individual commit act relating to money laundering crime for terrorism financing, Reporting Unit is responsible to report immediately on money laundering act with aim to finance terrorism to the BOM (through Department in charge of AML) for processing in accordance with laws and internal regulations of VPBank.
3. Grounds to assume that organization or individual conducting act relating to money laundering crime with the aim to finance terrorism include:
  - a) Customer conducting or intending to conduct transaction relating to organization or individual listed in relevant Resolutions of United Nations Security Council.
  - b) Customer conducting or intending to conduct transaction relating to organization or individual included in list of organization and individual involving terrorism and financing terrorism which are set out by other international organizations (not United Nations) or other countries and being warned by the State bank of Vietnam.
  - c) Customer conducting or intending to conduct transaction relating to organization or individual convicted as terrorist and financing terrorism in Vietnam.

- d) Customer conducting or intending to conduct transaction relating to organization or individual involving terrorism and financing terrorism that Reporting Unit has known from other sources.
4. Department in charge of AML, after being approved by the BOM, is responsible to report promptly to the competent anti-terrorism agency and send this report to the State Bank of Vietnam at the same time on act relating to crime of money laundering aiming to financing of terrorism according to the guidance of the State Bank of Vietnam.
5. Time limit for reporting in this Article is defined as sending report on transaction having sign relating to crime set in point (c) clause 3 Article 20 of this Regulation.

#### **Article 24. Anti-terrorism financing**

1. Reporting Unit is obliged to apply measures to prevent terrorism financing specified in Article 5, Article 6, Article 7, Article 8, Article 9, Article 11, Article 12, Article 14 and Article 17 of this Regulation.
2. When suspecting any organization or individual of relating to terrorism financing, Reporting Unit is obliged to report suspicious transactions in writing or electronic data to the BOM (through Department in charge of AML) in accordance with the law and VPBank regulation in each period.
3. Content of the suspicious report related to terrorism financing must be conducted in accordance with the law and VPBank regulation in each period.

### **Section 3**

## **COLLECT AND PROCESS INFORMATION ON MONEY LAUNDERING PREVENTION**

#### **Article 25. Collect and process information**

1. Department in charge of AML is entitled to request relevant Unit and individual to provide information, material, document and other information necessary to analyze, evaluate and handle information on money laundering prevention activities.
2. Reporting Unit and relevant Unit and individual are responsible to provide Department in charge of AML with information, material and document of transaction and other information set by this Regulation to serve reporting, analyzing and handing of information.
3. Information gained from the processing information and document as prescribed in Clause 1 of this Article is the “Confidential” information for prevention of money laundering activities in VPBank.

### **Section 4**

## **APPLICATION OF PROVISIONAL MEASURES**

#### **Article 26. Delay transaction**

1. *Transaction delay* means act of VPBank not implementing transaction in maximum three (03) working days from the beginning date of application this measure and this is the form of blocking temporarily before receiving official decision issued by competent state agency. VPBank is entitled to continue implementing this transaction in case it does not



- receive official decision, with its content allowing VPBank to conduct that transaction, issued by competent state agency after mentioned period.
2. Reporting Unit has to apply the measure of delaying transaction when at least one of transaction parties included in the blacklist or there is reason for Reporting Unit to believe that transaction requested to be performed relating to criminal activity.
  3. Reasons to believe that transaction requested to be performed relating to criminal activities include:
    - a) Transaction is requested to implement by person convicted in accordance with criminal procedure laws and asset in that transaction originated from ownership or control of that person or property of organization owned or controlled by that person during or after criminal activity being conducted.
    - b) Transaction is prescribed in clause 3 Article 23 of this Regulation.
  4. Reporting Unit is responsible to report to the BOM (through Department in charge of AML) in writing immediately after delaying transaction. Basing on that, Department in charge of AML, after being approved by the BOM, is responsible to report in writing as well as notify by telephone immediately to competent state agency and report to the State bank of Vietnam for coordination concurrently.
  5. The competent state agencies specified in this Article include:
    - a) The investigation agencies at all levels;
    - b) The People's Procuracies at all levels; the Military's Procuracies at all levels
    - c) The People's Courts at all levels; the Military Courts at all levels.

**Article 27. Block account, seal or temporarily seize property**

1. Reporting Unit has to block account or apply measure of sealing or temporary seizing property of individual and organization upon decision of competent state agency in accordance with laws and regulations of VPBank in each period.
2. Reporting Unit has to report to the BOM (through Department in charge of AML) immediately after blocking account in order that VPBank can report to competent state agency timely.

**Section 5**

**OTHER MEASURES**

**Article 28. Elaborate and promulgate internal regulations on money laundering prevention**

1. Basing on this Regulation and other relevant regulations of VPBank, all units in VPBank, according to their scope of functions and duties, are responsible to coordinate with Department in charge of AML to elaborate internal AML regulations of the VPBank (in order to submit those regulations to competent authority for issuance).
2. Content of those internal regulations has to comply with organizational structure, operational scale and risk level of money laundering in operation of VPBank.
3. Units, basing on their functions, duties and authorization, have to review, evaluate and recommend regularly to competent authority to amend and supplement internal regulations

mentioned above ensuring that those regulations confronting to laws and VPBank regulations as well as development of product and service provided by VPBank.

4. Internal AML regulations have to be delivered to each unit, individual responsible to implement AML measure in each unit. Internal AML regulations have to be delivered to organization and individual hired by VPBank to implement one or several tasks relating to the financial and monetary transaction in VPBank also.
5. Depending on each specific case, competent authority of VPBank decides to provide AML related internal regulations to other financial institutions in correspondent banking relationships after being requested.

#### **Article 29. Internal training in money laundering prevention**

1. Department in charge of AML annually cooperates with related units and Human Resource Department to construct and implement AML training program for professional or semi-professional officers and staff who are supposed to be in charge of AML and who are supposed to be related to asset and money transactions.
2. Within 6 (six) months from the recruitment date of new staff who are supposed to be in charge of AML or related to asset and money transactions with Customer, VPBank related Unit must implement AML training program for those staff.
3. The training method is selected in accordance with scale and VPBank actual operating situation.
4. Content of training program
  - a) The provision of the AML law and VPBank AML internal regulations.
  - b) Responsibility for non-compliance, non-implementation and non-full implementation of the provision of the AML law and VPBank AML internal regulations.
  - c) Money laundering methods, tricks and trends.
  - d) Risks related to products, services and tasks which VPBank officers and staff are assigned to conduct.
  - e) Several international practices relates to the field of AML.

#### **Article 30. AML internal audit**

1. Internal Audit Division is responsible for auditing AML implementation annually or unexpectedly as request of authorized level. The AML internal audit can be conducted independently or in combination with other contents.
2. Internal auditing content includes: review, evaluate independently and objectively internal control system, internal regulation compliance; recommend, propose measures to improve efficiency and effectiveness of Anti Money Laundering.
3. Any violation detected in the controlling and internal auditing process must be reported to Person in charge of AML, the CEO and the Department in charge of AML for further handling.
4. Within 60 days after the end of each fiscal year, VPBank must send the AML internal auditing report to AML Department of the State Bank of Vietnam.

**CHAPTER III**  
**RESPONSIBILITY OF UNIT AND INDIVIDUAL IN**  
**MONEY LAUNDERING PREVENTION; HANDLE VIOLATION**

**Article 31. Appointment of Officer and Department in charge of AML**

1. AML Department – Legal & Compliance Division is the unit responsible to manage and monitor AML activities in VPBank.
2. The CEO assigns one member in the BOM to be responsible of organizing, directing and examining the compliance with AML regulations at VPBank (Officer in charge of AML) and registering contact details (full name, working place, phone number, fax number, email) with AML Department of Banking Inspector and Supervision Agency for communication if required. When changing the Officer in charge of AML or contact details of the Officer in charge of AML, the CEO or authorized Officer must announce timely in writing to AML Department.
3. In branches, the CEO assigns Regional Manager or Branch Manager or appropriate officer as Branch AML Officer in charge of AML activities, including frequent monitoring and supervising of AML activities at those branches; implementing other rights and obligations in accordance with this Regulation and other regulations related to the Law and VPBank.

**Article 32. Responsibilities of Department in charge of AML:**

Department in charge of AML is responsible to coordinate, in collaboration with other units in VPBank, to implement the following tasks:

1. Responsibilities relating to elaborate internal regulation:
  - a) Be the contact point in elaborating and submitting internal regulations relating to AML policies and implementation of AML measures in accordance with laws to competent authority of VPBank to promulgate those regulations.
  - b) Update provisions of AML laws regularly to propose competent authority to amend and supplement this Regulation as well as other relevant regulations and guidance of VPBank on AML.
  - c) Review and provide opinion in connection with AML to internal regulations composed by other units.
2. Responsibilities relating to report, provide, deliver and retain information, material:
  - a) Report to the State Bank of Vietnam daily the large amount transaction and electronic money transfer transaction by sending electronic data files.
  - b) Receive, handle and report to competent authority AML related information and reports submitted by reporting units.
  - c) Request other unit in VPBank to provide AML related information and documents sufficiently and timely for synthesizing and providing to competent state agency or other organization, after being approved by competent authority.
  - d) Be the contact point for receiving and submitting black lists, warning list and/or other AML related list issued by competent State agency and/or international

organization to competent authority of VPBank to decide to deliver these lists to all units in VPBank.

- e) Retain document and material relating to AML and combating of terrorism financing of VPBank.
3. Responsibilities relating to examination and inspection:
    - a) Examine and inspect (periodically or suddenly) and assess the compliance of laws and regulations of VPBank on AML by itself or in coordination with relevant unit at all units in VPBank.
    - b) Report to competent authority result of activities mentioned in point (a) of this clause.
    - c) Provide competent authority or relevant unit of VPBank with comments and recommendations to amend and/or implement VPBank policies on AML basing on result of activities mentioned in point (a) of this clause.
  4. Responsibilities relating to internal training:
    - a) Coordinate with Human Resources Management Division of VPBank or other agency and/or organization to implement internal training activities on AML.
    - b) Elaborate AML training material by itself or in coordination with relevant unit.
  5. Other responsibilities and duties relating to AML assigned or appointed by the competent level of VPBank in each period.

**Article 33. Responsibility of Payment, Trade and Treasury Processing Department and Western Union Department**

Payment, Trade and Treasury Processing Department and Western Union Department, within scope of their function and duty, have responsibilities in implementing following tasks:

1. Monitor and review regularly payment activity of the whole VPBank system through centralized payment portals, and ensure that all payment transactions are processed through these departments in compliance with laws and VPBank regulations on AML.
2. Report promptly to competent authority case detected as having suspicious sign or money laundering sign in working process.
3. Report periodically or suddenly according to request of competent authority of VPBank.
4. Coordinate with Department in charge of AML to (i) elaborate internal regulations relating to AML policies and (ii) implement measures in accordance with provisions of law.
5. Retain document and material relating to report on AML and counter financing terrorism performed itself.
6. Implement and comply strictly and fully with provisions of law and internal regulations or guideline of VPBank on AML in each period.

**Article 34. Responsibility of Risk Management Division**

Risk Management Division, within scope of its function and duty, has responsibilities in cooperation with the Compliance Department in implementing AML related tasks including:

1. Research, update new technology which may be used in transaction of finance, property between credit institution and its customer; deliver to and warn VPBank unit of those new technologies.
2. Research, update risk may be occurred in connection with application of new technology mentioned in clause 1 of this Article into transaction of finance, property between credit institution and its customer; deliver to and warn VPBank unit of those risks.
3. Co-operate with relevant units to research and elaborate regulation, process and guidance for performing AML related tasks in new-technology related transactions.
4. Co-operate with other relevant units to propose competent authority of VPBank to implement measures and tools of money laundering risk management in accordance with risk management strategy of VPBank in each period.
5. Implement other AML related task and duty assigned by competent authority of VPBank in each period.

#### **Article 35. Responsibility of Information and Technology Division**

Information Technology (IT) Division, within scope of its function and duty, has responsibilities in implementing AML related tasks including:

1. Research and update for competent authority, Department in charge of AML and other unit of VPBank about IT product used with purpose of AML in fields of finance and banking.
2. Co-operate with relevant units to research, elaborate regulation, process and guidance for performing AML related task in IT field.
3. Co-operate with Department in charge of AML and other relevant unit to design, select, implement and apply AML related IT product/solution as directed by competent authority of VPBank.
4. Implement other AML related task and duty assigned by competent authority of VPBank in each period.

#### **Article 36. Responsibility of Internal Audit Division**

Internal Audit Division, within scope of its function and duty, has responsibilities in implementing AML related tasks including:

1. Conduct AML audit during operational auditing process at Units in accordance with the provisions of the Law and this Regulation.
2. Report on case detected that having suspicious or money laundering sign to competent authority during audit period at unit.
3. Prepare AML audit report at VPBank and deliver this report to the State Bank of Vietnam as specified and required by laws.
4. Implement other AML related task, duty assigned by competent authority of VPBank in each period.

#### **Article 37. Responsibility of Human Resources Management Division**

Human Resources Division, within scope of its function and duty, has responsibilities in implementing AML related tasks including:

1. Co-operate with Department in charge of AML and other relevant unit to design training plan and program applied for VPBank staff in order to submit to competent authority of VPBank for approval.
2. Be the contact point for organizing training course and implement AML training activity applied for VPBank staff in accordance with plan, program approved by competent authority of VPBank.
3. Co-operate with Department in charge of AML and other relevant unit, if any, to examine, assess participant in AML training course organized.
4. Retain results of examination and assessment mentioned above to consider signing/re-signing labor contract and other personnel assessment.
5. Implement other AML related task, duty assigned by competent authority of VPBank in each period.

#### **Article 38. Responsibility of Reporting Unit**

Reporting Unit, within scope of its function and duty, has responsibilities in implementing AML related tasks including:

1. Give opinion to and co-operate with unit drafting AML related internal regulation.
2. Assign staff or team under its operation as AML point of contact.
3. Report and review transaction by itself as specified by AML laws and internal regulations.
4. Co-operate with Department in charge of AML and/or Internal Audit Division during the process of AML examination, auditing in its operation.
5. Report transaction having suspicious sign to competent authority immediately.
6. Provide Department in charge of AML with information and documentation completely, promptly and within deadline as required.
7. Comply strictly and completely with laws and internal regulations relating with AML.
8. Head of Reporting Unit has responsibilities in implementing laws, internal regulations and tasks mentioned in this Article in unit managed by him/her.

#### **Article 39. Responsibility of individual relating to AML**

1. Responsibility of Responsible Officer on AML of VPBank

Responsible Officer on AML of VPBank is member of the BOM of VPBank, authorized by the CEO, whose information on full name and position is registered with the State Bank of Vietnam. Responsible Officer on AML of VPBank has responsibilities as follows:

- a) Watch over Department in charge of AML.
- b) Steer Department in charge of AML and other relevant unit to elaborate, amend, supplement and review AML related regulations of VPBank to ensure those regulations complying with applicable laws.
- c) Report the CEO, the BOD on implementing AML related regulations, policies and measures in VPBank when requested.

- d) Sign on AML related reports or letters or notices between VPBank and other competent state agency or relevant organization.
  - e) Keep AML related information, material confidential.
2. Responsibility of staff under Department in charge of AML
- Staff under Department in charge of AML, after assigned, has responsibilities as follows:
- a) Elaborate, draft and review AML related regulation, policies of VPBank to ensure those regulations, policies complying with laws.
  - b) Be the contact point to transfer information, report between unit and competent authority of VPBank and between VPBank and competent state agency.
  - c) Explain, guide unit in the whole VPBank system to implement AML related regulations, policies of VPBank.
  - d) Prohibited from participating with or covering unit when detecting that unit provide incorrect information, making fake information or hiding suspicious information, sign of transaction or Customer.
  - e) Keep AML related information, material and others relating to tasks assigned confidential.
  - f) Report promptly to competent authority of VPBank and present appropriate plan to resolve transaction, Customer having suspicious sign after receiving report from unit.
  - g) Inform promptly to and coordinate with unit to implement provisional measures, if any, or other measure in plan of resolving transaction, Customer, approved by competent authority, having suspicious sign.
  - h) Implement other tasks relating to AML internal training.
  - i) Implement examining and inspecting unit in AML activities.
3. Responsibility of Officer in charge of AML at units
- a) Regularly update and monitor to comprehend provisions of law and internal regulations, policies of VPBank on AML.
  - b) Instruct and provide training to officers and staff in the unit on VPBank regulations and policies in each period.
  - c) Supervise and monitor officers and staff in the unit to implement strictly regulations of the Law and internal regulations and policies of VPBank on AML, including but not limited to: conducting and updating KYC, Customer and Transaction Due Diligence in accordance with AML lists; making transaction reports to VPBank competent authorities.
  - d) Instruct officers and staff in the unit to implement AML measures effectively.
  - e) Report AML process at the request of Department in charge of AML, VPBank competent authorities and in accordance with provisions of the Law.
  - f) Secure the secrecy of provided and processed information and documents on AML.

- g) Implement other tasks relating to AML at the request of Department in charge of AML and at the requirement of VPBank competent authorities and provisions of the Law.
4. Responsibility of management officer at direct transaction unit with Customer
- According to their scope of functions and duties, management officers at VPBank unit in charge of conducting direct transaction with Customer have the following responsibilities:
- a) Regularly update and monitor to comprehend provisions of law and internal regulations, policies of VPBank on AML .
  - b) Cooperate and support Officer in charge of AML at unit in performing AML tasks.
  - c) Secure the secrecy of provided or reported information and documents on AML.
  - d) Prohibited from (i) colluding and covering Customer when Customer provides inaccurate and false information; and (ii) hiding suspicious information, signs of transaction or Customer.
5. Responsibility of individual conducting transaction directly with Customers
- Individual conducting transaction directly with Customer has responsibilities as follows:
- a) Regularly update and monitor to comprehend regulations of law and internal regulations, policies of VPBank on AML.
  - b) Strictly and fully comply and implement provisions of the Law, VPBank AML regulations and professional practices relating to Customer's transactions.
  - c) Keep AML related information, material and suspicious transaction, have-to-report transaction confidential.
  - d) Prohibited from (i) colluding or covering Customer when detecting that Customer provides incorrect information, making fake information or (ii) hiding suspicious information, sign of transaction or Customer.

**Article 40. Handle violation**

- 1. Reporting Unit, Unit, Officer and Staff violating this Regulation, according to nature and level of that violation, shall be handled following regulations of VPBank in each period.
- 2. Unit, Officer and Staff who violating has to compensate VPBank with indemnity determined by competent authority of VPBank for any damage of VPBank in any manner caused by act of violation mention in clause 1 of this Article.
- 3. Department in charge of AML, on basis of opinion or approval of competent authority of VPBank, will transfer violation and relevant document and material to competent state agency under Vietnamese laws in case act of violation having sign of breaching criminal laws.

**CHAPTER IV**

**IMPLEMENTATION PROVISION**

**Article 41. Implementation provision**



1. This Regulation shall come into effect on the date of \_\_\_\_/\_\_\_\_/2014 and replace following documents:
  - a) Regulation on implementing anti-money laundering measures in VPBank no. 549/2014/QĐi-HĐQT dated May 13, 2014 issued by the BOD.
  - b) Directive no. 67/2014/HD-TGD dated August 1, 2014 on reporting transaction in AML process at VPBank issued by the CEO.
2. The CEO is authorized by the BOD to regulate in details of and guide to implement this Regulation and other AML particular laws.
3. Those were not specified in this Regulation shall be implemented as relevant provisions of laws and VPBank regulations. Any content of this Regulation being in compliance with laws and/or with regulation of General Meeting of Shareholders shall be null and void.
4. Any amendment/supplementation/replacement in this Regulation is determined by the Board of Directors. The Board of Management, units, relevant officers and staff are supposed to implement this Regulation.

**PP. BOARD OF DIRECTORS**

**CHAIRMAN**

Signed and Sealed

**NGO CHI DUNG**

## RELEVANT DOCUMENTS

### Internal documents:

Ordinal No.	Name of document	No. of document	Date of issue
1.	Regulation on organization and operation of the Board of Directors	957/2011/QC-HĐQT	29/7/2011

### External documents:

Ordinal No.	Name of document	No. of document	Agency of issue	Date of issue
1.	Law of Credit Institutions	47/2010/QH12	Congress	16/6/2010
2.	AML Law	07/2012/QH13	Congress	18/6/2012
3.	Decree on stipulating implementation several Articles of the AML Law	116/2013/NĐ-CP	Government	04/10/2013
4.	Circular on guiding implementation several regulations of the AML Law	35/2013/TT-NHNN	State Bank of Vietnam	31/12/2013
5.	Circular on amending and supplementing several Articles of Circular on guiding implementation several regulations of the AML Law	31/2014/TT-NHNN	State Bank of Vietnam	11/11/2014

### AMENDED/SUPPLEMENTED/REPLACED INTERNAL DOCUMENTS

Ordinal No.	Name of document	No. of document	Agency of issue	Status
1	Regulation on implementation AML measures in VPBank system	549/2014/QĐi-HĐQT	13/5/2014	Expired