



The Compliance Commission of The Bahamas

NOTICE

Re: FATF countermeasures against IRAN

Dear Registrant,

Pursuant to Financial Action Task Force standards and Proceeds Of Crime Act 2018, The Bahamas is mandated to advise financial institutions and DNFBPs of concerns about weaknesses in the AML/CFT/CFP systems of Iran, and take appropriate, risk-based measures to protect the integrity of the international financial system from these threats.

The Compliance Commission wishes to inform in accordance with the FATF's Recommendation 19 and Section 6 POCA 2018, the following countermeasures are to be applied against IRAN to mitigate the serious ML/TF/PF risks of doing business with the country:

Please respond by indicating yes/no if appropriate measures/mechanisms, have been instituted to ensure adherence to the mandated countermeasures against IRAN (private and public entities and individuals) using the table below.

Registrants are required to apply specific elements of enhanced due diligence, including:	YES/NO
Obtaining additional information on the customer (e.g. occupation, volume of assets, information available through public databases, internet, etc.), and updating more regularly the identification data of customer and beneficial owner	
Obtaining additional information on the intended nature of the business relationship	
Obtaining information on the source of funds or source of wealth of the customer	
Obtaining information on the reasons for intended or performed transactions	
Obtaining the approval of senior management to commence or continue the business relationship.	
Conducting enhanced monitoring of the business relationship, by increasing the number and timing of controls applied, and selecting patterns of transactions that need further examination	

Requiring the first payment to be carried out through an account in the customer's name with a bank subject to similar customer due diligence (CDD) standards	
Institute enhanced relevant reporting mechanisms or systematic reporting of Iranian financial transactions to senior management and available for review by the CC.	
Registrants are prohibited from establishing branches or representative offices in Iran, or otherwise taking into account the fact that the relevant branch or representative office would be in Iran, a country that does not have adequate AML/CFT/CFP systems.	
Limit business relationships or financial transactions with the Iran or persons in Iran.	
Registrants are prohibited from relying on third parties located in Iran to conduct elements of the CDD process	
Registrants are required to review and amend, or if necessary, terminate, correspondent relationships with financial institutions in Iran.	
Firm/Company name	

Please forward your response without delay to compliance@bahamas.gov.bs

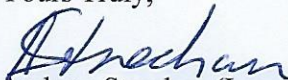
Ensure that all relevant staff are informed of these countermeasures against Iran and your Policy & Procedure document includes the obligation to have a risk management system for customers & beneficial owners and screen clients to determine if they originate from a higher risk country as defined by FATF and apply the appropriate measures defined by FATF (list of high risk countries is available on the FATF website <http://www.fatf-gafi.org/>). These procedures must be included in your annual AML/CFT internal staff training.

In accordance, with these countermeasures supervisory authorities in The Bahamas must refuse the establishment of subsidiaries or branches or representative offices of financial institutions from Iran, or otherwise taking into account the fact that the relevant financial institution is from Iran, a country that does not have adequate AML/CFT/CFP systems

Further, registrants are reminded to comply with section 44 of the Anti-Terrorism Act 2018 & Anti-Terrorism Regulations 2019, and amendments.

Your cooperation in this regard is most graciously appreciated.

Yours Truly,


Andrew Strachan (Inspector)

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