

“Approved”  
The Supervisory Board  
OJSC «Oriēnbank»  
Minutes No.\_\_\_\_  
«\_»\_\_\_\_\_2012

«Approved»  
Resolution of the Management Board  
OJSC «Oriēnbank»  
Minutes No.\_\_\_\_  
«\_»\_\_\_\_\_2012



**REGULATION  
ON PREVENTION OF MONEY-LAUNDERING AND  
FINANCING OF TERRORISM (PPML/FT)**

**DUSHANBE-2012**

## **Definition of money-laundering and financing of terrorism**

**Money-laundering** – performance of property transactions and other operations with incomes, received knowingly by criminal way, concealment or keeping of true nature, source, location, disposition, transfer, property rights or its ownership, as well as use of such incomes on entrepreneurial or other economic activity or its use by other way.

**Financing of terrorism** – it is provision or fund raising, directly or indirectly, in order, that they are fully or partially used or in knowing, that they will be used by terrorist, terrorist organization, as well as for organization, preparation and commitment of acts of terror, including crimes, indicated in articles 179, 179.1, 179.3, 181, 182, 184, 184.1, 184.2, 184.3, 184.4, 185, 193, 194, 194.1, 194.2, 194.3, 194.4, 194.5, 310 and 402 of the Criminal Code of the Republic of Tajikistan and equally, if such funds actually have not been used on commitment of crime;

**Dubious transactions and operations** – transaction (operation) may be dubious, if there is no possibility to identify the client or receive by credit organization information for conclusion or performance of this operation (dealings), provided by legislation.

Dealing with the following areas of commerce and/or providing the following bank products, the bank shall pay maximum attention and caution, in order to identify transactions on probable money-laundering and financing of terrorism.

### **2. Areas of commercial activity with increased risk:**

- gaming industry, casinos;
- hotels, especially with casinos in them;
- non-banking financial organizations (financial broker, money exchange agencies);
- travel agencies;
- import / export companies;
- companies / dealers on precious metals;
- offshore corporations;
- securities / broker services/insurance companies;
- dealers on provision of new / utilized cars / trucks / water and air transport;
- dealers on provision of utilized mechanic spare parts;
- any business, connected with intensive cash flow;
- business relevant to:
  - drug transportation/production;
  - financing of terrorism;
  - collection of confidential banking information;
  - emerging areas of activity where convertible currency is widely used.

### **3. Bank products with high risk**

Criminals may easily abuse all banking products, that are used for cash conversion into implements, allowing quickly make a quick payment.

Products, identified as easily abused and products with high risk mainly include:

- traveler check / bank expenditures;
- open of a large number of deposit accounts by one client, the general amount of funds on them is large or in future will be transferred on the purposes, that are not indicative for this client;
- frequent enlargement of big amounts of banknotes of small denomination and inverse

operation;

- permanent operations, that are not connected with main activity of the client on buy and sell of foreign currency for the purposes of payment of large amounts on agreements or transactions;
- withdrawal of large amounts from account, which up to this moment has not been active, or on which was made a transfer of large amount;
- frequent deposits on the same account by various third parties without appropriate reason;
- transfer of funds abroad on the account of anonymous holder or receipt of funds from this account;
- failure to provide or delay in provision of information about purposes of business, banking history, employees or administration, location of the client;
- refusal to provide information for the assessment of the client for a loan or for the provision of other bank services.

#### **4. Policy of banking supervision on (PPML/FT)**

The main requirement for the effective implementation of policy on PPML/FT – availability of information at the bank, reflecting the most important indicators of its clients for the bank, including information on founding members, executive body, types and forms of activity, other necessary parameters and characteristics. Bank may establish relations only with those clients, whose legitimate origin of sources of income or financing may be reasonably confirmed.

The responsibility of Bank is particular attention to operations with bank involvement (including opening of deposit, investment in safety of cash and values or individual/corporate credit accounts), that could be potentially used for money-laundering and financing of terrorism and reasonable tracking flow of funds on the accounts of clients for the detection of signs of money-laundering and financing of terrorism.

Appropriate signs and alertness in relation to unusual or dubious operations may help to reveal and stop plans of money-laundering and financing of terrorism.

#### **4.1. Procedures**

Bank carries out the procedures listed below in accordance with legislation of the Republic of Tajikistan, rules, regulations and instructions of the National Bank of the Republic of Tajikistan and other laws and regulations and internal documents of the Bank.

#### **5. Measures taken**

Bank takes several measures for prevention of intentional and unintentional cooperation in money-laundering and financing of terrorism. The most important of them are:

- ▲ Knowledge of its client – study of business character;
- ▲ Study of transactions, revelation, report of dubious operations;
- ▲ Record keeping and data storage.

This measure includes five main requirements:

- ▲ prove the client's identity;
- ▲ understanding of its business;
- ▲ knowledge of funds sources;
- ▲ monitoring of accounts on the subject of deviation from the normal course of activity;
- ▲ determination, if such deviation does not connect with dubious operation.

Identification of the client is made with the purpose to receive the most detailed image about the client.

#### **5.1. Requirements on identification of individual persons:**

People, involved in illegal activities, always prefer that their identity has not been identified. So, often when opening personal accounts, money transfer and etc. are provided counterfeited,

forged, stolen documents. In connection with it, the bank's employees should make every effort for study and confirmation of identity of potential client. Opening of accounts is possible only after full and satisfactory confirmation of client's identity. The main requirements, when reviewing document, that confirms identity of the client are as follows:

Document, confirming identity of potential client shall contain following data:

shall be issued by state agency;

shall have identification number and photo, that really shows presenter;

shall have place and date of issuance;

shall have registration stamp;

full name, date of birth;

contain signature of identified person.

Opening of account for the clients also includes an obligatory procedure of examination of all clients at list of terrorists, provided by authorized state agencies.

All data shall be collected from original documents on the basis of which are formed the copies of documents for the storage in Bank.

In addition to the information from official documents, the file of the client shall contain any other information, obtained from conversation with borrower, as well as from other unofficial sources, for example about annual incomes of the client, source of deposits, actual place of residence and etc.

Particular attention shall be paid to business relationships and operations with companies and persons – not-residents.

## **5.2. Requirements on identification of legal entities:**

In case of opening of accounts by corporate clients, it is necessary to identify the person, authorized to represent a company, verify the powers and personal identity on whose behalf he acts.

Before establishing of business relations, it is necessary to take measures for the statement of the fact, that applicant does not dissolve, has not been excluded from the register, does not liquidated or does not terminate his activity. In addition to it, if in future there will be any changes in the structure or in the property rights of the company, or there will be any suspicious because of changes in the scheme of payments through the account of the company, additional reviews shall be carried out.

To open the account of the client – legal entity, it is necessary to provide the availability of the following legitimate documents (originals or notarized copies):

registration number; place of registration; location;

Certificate of establishment of legal entity or equal document;

Charter of legal entity;

The Decision of the Board of Directors about opening of account and authorization of those, who will operate this account.

Search of case file of the company in the agencies of its registration (accordingly).

Personal data of persons, authorized on operation of account.

Responsible employee shall pay particular attention at the acceptance of documents on following (minimal requirements):

⤴ if the originals of documents are submitted;

⤴ if there are stamps (ink or raised);

⤴ if there are spots, erasures and etc.;

⤴ if the photo in document is the photo of presenter of this document;

⤴ if the age of presenter corresponds the date of his birth, indicated in document, certified the identity;

⤴ if the signature on the documents corresponds the signature made in your presence;

⤴ documents are submitted by intermediate or agent.

- ⤴ Examine all clients at the list of terrorists, provided by authorized state agencies.

### **5.3. Dubious signs**

- ⤴ client avoids to provide documents (information), required for identification;
- ⤴ excessive, unusual concern of the client with the questions of confidentiality;
- ⤴ for identification the client provides incomplete, corrupt or improper documents (information);
- ⤴ identification data of clients are not agree;
- ⤴ it is impossible to verify authenticity of submitted documents;
- ⤴ client without any argumentation delays the submission of documents;
- ⤴ there is an old date of issuance on document, submitted by the client, but the document looks as a new one, or it has new issuance date, though there shall be the old one;
- ⤴ client refuses to provide originals of documents and provides only their copies;
- ⤴ in documents, submitted by the client for operations, there are inconsistencies;
- ⤴ client, living or staying in the territory of the Republic of Tajikistan, in the process of operation clearly avoids directly come to person accountable (in case of operations, when attendance is compulsory); and etc.

### **5.4. Banking services through Internet (online banking)**

When providing bank services through Internet, there are following 3 factors, complicated the identification of the client, standard monitoring of accounts and transactions:

1. opportunity of anonymous access through Internet
2. impersonal contact between client and bank
3. speed of electronic transactions.

In case of retail services in Internet, in the bank shall be set in special software, that let to monitor dubious online and offline operations in accordance with specified criterion dubiousness and get necessary additional information on identity of client-user.

Also, it is necessary to take into account that for money-laundering and financing of terrorism may be used the payment cards of the client. Payment cards are convenient means of export of large amounts abroad, because there is no necessity to declare money on cards.

### **5.5. Study of transactions and identification of dubious operations**

Assessment and study of transactions – is a method, that helps to determine, if the business of the client agrees with those declarations, that he had provided at the opening of account. In case of non-coincidence or deviation, it is necessary to study transaction more attentively on the subject of its unusual or dubious base.

In many cases, the purpose of money-launderer and person financing terrorism is introduction of as many levels for operations as possible. It means, that money will go through a range of sources and through various persons and organizations. For this purpose may be used the account of the client, that have been passive for a long time or clients with good reputation and long-term history.

The main responsibility on monitoring of account activity is on account manager, who monitor the account. He is the first, who shall pay attention on dubious operations.

### **5.6. Additional examination**

Some types of additional examinations may provide reasonably sufficient idea about the client and information, provided by him.

Examples of additional examination:

- ⤴ examination on telephone book;
- ⤴ use of any computerized system for examination of internal and external database with the purpose to reveal any inconsistencies in provided information;
- ⤴ contact on work or home telephone, informed by the client;
- ⤴ with agreement of the client, it is possible to clarify positions of employees in the personnel department of the client, somehow indicated in submitted documents;
- ⤴ examination of Identification Registration Tax Number, personal account and etc.

### **5.7. Record keeping and data storage**

All identification data about the client and his transaction as internal, as well as international shall keep in the Bank in accordance with current regulations of RT. In case if the client or any operation at any moment attracted attention, information about them shall be registered and shall keep within the same period.

### **5.8. Transactions required an obligatory control**

For the record keeping and control of all transactions above the amount (in accordance with Art.6 of the law on PPML/FT) employee of the Bank accordingly will keep the register, that will contain the following information:

- ⤴ Actual name of the account holder and/or funds;
- ⤴ Money turnover on account;
- ⤴ Source of origin of funds (if possible to determine);
- ⤴ Information on identity of the person, who carries out transaction; (for individual persons)
- ⤴ Allocation of funds;
- ⤴ Form, in which the funds were deposited (cash, check and etc.);
- ⤴ Any other important information about the client.

## **6. Examples of dubious operations**

These examples are given for information and are not the full list:

### **6.1. Payments:**

- ⤴ Not quite clear payment details and the client refuses to provide additional information;
- ⤴ The client does not have the main facts about transaction and does not care about paid taxes, duties, fees and etc.;
- ⤴ Client is controlled by attendant, in cases when the client does not have information about operation, not sure or is in old age and is attended not by his relative;
- ⤴ Client carries out operation, that far exceeds the capabilities of his company;
- ⤴ Client often receives and sends money transfers, whereas the activity of his organization does not require such activity;
- ⤴ Client does not have evident sources of income, but he carries out frequent operations;
- ⤴ Client offers good seller, gift, remuneration for conclusion of transaction.

### **6.2. Behavior of the Client**

- ⤴ Client tries to convince transaction processing officer to avoid observance of methods of operations record and/or observance of requirements on accounting;
- ⤴ Client tries to persuade the bank employee to violate the requirements of operational execution in a proper manner;
- ⤴ Client does not wish to accumulate large amounts on one account, though he knows, that in this

- case he will get higher interest;
- ⤴ Client refuses to continue transaction, after he is informed, that data of these transaction will be submitted to Tax authorities;
- ⤴ Client deposits amounts, without money counting;
- ⤴ Client deposits counterfeit money or old, contaminated banknotes;
- ⤴ Client, who does not have permanent major sources of income (student, pensioner) transfer or exchange large amounts;
- ⤴ Many turnovers on account within a day, but small fund balance at the beginning and at the end of the day;
- ⤴ offshore company is involved in operation, which name is associated with well-known financial organizations;
- ⤴ operation includes unknown countries or islands, that can not be found on the map;
- ⤴ agent, as authorized person or financial adviser acts on behalf of another person without a properly executed documents, for example the power of attorney.

### **6.3. Operations with cash**

- ⤴ Client carries out several major operations with cash in various departments of the bank at the same day, or organizes the same operations with assistance of other people;
- ⤴ account of legal entity is credited or debited mainly in cash form;
- ⤴ Client often deposits large amounts in packing of other banks;
- ⤴ Client carries out unusual number of currency exchange operations.

### **6.4. Transfer operations**

- ⤴ transfer of large amounts to the countries, that are identified by FATT as not cooperating with others on prevention of money-laundering and financing of terrorism;
- ⤴ after incoming transfer, beneficiary immediately buys other money instruments for payment to another person;
- ⤴ unusual increase of international transfers on account, though there had not been such transfer history before, and indicated type activity of the client does not generate such funds;
- ⤴ client transfers funds, received on his account from abroad to another country;
- ⤴ client receives small transfers and then with the total amount, transfers funds to another country.

### **6.5. Credit operations**

- ⤴ as a coverage are provided funds, placed in offshore jurisdiction;
- ⤴ received credit funds unexpectedly are transferred to offshore jurisdiction;
- ⤴ client has non-standard number of bank accounts, whereas his type of activity does not require it;
- ⤴ transaction contains obligations, forcing the bank to refuse loans in connection with dubious origin of coverage.

### **6.6. Operations on trade financing**

- ⤴ client changes the name of beneficiary immediately before payment on letter of credit;
- ⤴ client changes payment details on letter of credit on details in other country, different from the originally specified details of beneficiary;
- ⤴ reserve letter of credit of the client uses as tender guarantee or as performance guarantee without standard description or contract, or in favor of unusual beneficiaries;

### **6.7. Investment activity**

- ⤴ funds are transferred to offshore areas;

- ⤴ investor is indifferent to standard questions concerning investments, such as commission fees or more convenient investments instruments;
- ⤴ client deposits cash, statements of money, traveler's or cashier's checks, that are not exceed the level of notification of Tax agency for crediting of investment account.

### **6.8. Behavior of employees**

- ⤴ employee whitewashes data about reputation, financial status and resources of the client in written reports, required by the bank;
- ⤴ employee leads a lavish lifestyle inconsistent to the sizes of his/her salary;
- ⤴ employee often violates instructions of internal control or tries to avoid them;
- ⤴ employees uses funds of the company for promotion of his personal interests;
- ⤴ employee promotes transaction, which does not show details of beneficiary or partner;
- ⤴ employee does not take a vacation, stays at work until late.

### **7. Order of procedures of employees in case of detection or suspicion in money laundering or financing of terrorism**

The Bank's employee who begins to realize, that he faced with dubious (financial) operation and even if the transaction has been already completed, he/she shall promptly:

- ⤴ ask the customer additional clarifying data on transaction;
- ⤴ in case of refusal or insufficiency of clarifying additional data, as it seems to employee, the employee shall inform his superior orally and then in written form about this transaction;
- ⤴ the head of department evaluates indicated facts and their backgrounds. Often, especially in cases, when a suspicion has arisen as a result of misunderstanding with a client, these questions may be settled by the head of department himself. In any case, the head of department will provide a copy of the first report of employee about suspicions together with comments of the head of department to the head of Compliance Department, despite the fact, that the issue was resolved favorably to that time.
- ⤴ In cases, when employee suspect his head, employee shall provide information orally and in written form directly to the head of Compliance Department, without informing his head about it. Providing, that information of employee was compiled from a disinterested intentions and his suspicions has not justified, the Bank does not take any actions against this employee and ensures the growth of his career without any derogation.
- ⤴ The head of department shall decide what to do with the information he had received.
- ⤴ The head of Compliance Department will keep the register of such reports, even if over the time these suspicions prove unfounded.
- ⤴ In case of identification of suspicious operation or transaction to take actions in accordance with Art. 7 and Art.9 of the law on PPML/FT.

### **8. Confidentiality**

Any employee of the Bank who in any way, in connection with his official position became aware of the investigation regarding dubious/unusual transaction or regarding the client, in any case should not disclose the fact of investigation to his colleagues and especially to the client. Disclosure of the fact of investigation is considered as violation of confidentiality and entails administrative responsibility in accordance with internal provisions and instructions of the Bank.

### **9. Responsibility of employees of the Bank in prevention of money-laundering and financing of terrorism**

Any employee of the Bank who in any way, in connection with his official position became aware of dubious transactions shall notify his head about it. It is an official regulation for employee. If



employee does not inform about dubious transactions, that will be considered as habitual negligence to his duties. Decision on expediency or in expediency of further control of transaction is accepted by Compliance employee, who in his turn has the right to get explanations or documents from any employee. Compliance employee may also ask for help in investigation from department of internal audit and other departments of the Bank.

### **10. Responsibility at investigation of transactions**

The Head of department of internal audit and Compliance employee are responsible for appropriate and impartial investigation of cases, indicated by another Heads of departments.

During the investigation the employees of Department of internal audit and compliance are guided by current policy and other regulations of the Republic of Tajikistan.

Employees of Department of internal audit and Compliance employee shall implement the following:

Responsibility for appropriate investigation on materials, transferred from heads and other organization departments is entrusted on the Head of Department of risk management.

During investigation it is necessary to carry out following procedures:

- ▲ carefully study all materials, concerning unusual or dubious operation (i.e. to check correctness and completeness of the original documents on opening of account, provided by the client, as well as any other available information on transaction);
- ▲ check all actions, performed by employee of the Bank during the opening of account by the Client (i.e. observance by employee of the Bank of established requirements on the struggle with money-laundering and financing of terrorism);

At the results of carried investigation, Compliance employee together with employee of Department of internal audit, prepare conclusion on this fact of investigation on the name of the President of the Board.

The conclusion shall contain facts, confirmed or negated irregularity or dubiousness of operation. In case of conformation of facts, the conclusion shall contain proposals on application of following actions:

- ▲ continuation of relations with client with enhanced monitoring;
- ▲ termination of relations with the client;
- ▲ notification of corresponding state agencies (if such notification is necessary in accordance with requirements of legislation of the Republic of Tajikistan);

It is necessary strictly observe the laws and regulations of the Republic of Tajikistan and the National Bank of the RT on bank confidentiality and bank secrecy.

For opposition to money-laundering and financing of terrorism, the Bank has the right to collect additional information from other financial organizations.

### **11. Program of studying of employees of the Bank.**

Bank personnel shall pass theoretical training on possible aspects of money-laundering and financing of terrorism, including corresponding regulation base on this issue.

Compliance employee of the Bank will ascertain, that corresponding training programs on money-laundering and financing of terrorism have been provided to all employees of the Bank through Personnel Department.

The pass of these program is obligatory for all heads and personnel

### **12. Introduction of internal control**

Original inspection of operations is carried out by employee of the Bank, responsible for the account of the client.

Current and following monitoring is carried out by the Head of Department, who performs specific operations on the account of the client.

The next control is carried out by Compliance employee.

The final control is carried out through systematic compliance inspections of employees with regulative and internal procedures by Internal and External auditors.

Compliance officer is responsible for implementation of procedures on PPML/FT within the Bank:

- ^ provision of availability of proper procedures in the Bank;
- ^ provision of understanding of policy PPML/FT among the personnel;
- ^ provision of compliance with Bank procedures on PPML/FT, their implementation, support and monitoring; and timely notification of department about any dubious transactions;
- ^ provision of confidentiality of information in relation with clients in accordance with regulations of this policy;
- ^ provision of compliance with current legislation of the Republic of Tajikistan on PPML/FT, participation in collaboration and improvement of legislation;
- ^ provision of familiarity about international initiatives on PPML/FT, ascertain that the Bank pays particular attention and acts properly on transactions with uncooperative countries and territories;
- ^ keep the register of dubious transactions;
- ^ provision of quarterly report about all dubious operations to the Board of Directors;
- ^ provision of quarterly report about all dubious operations to Committee on Audit of Shareholders.

Responsibility of employees of the Bank for failure to take measures or for actions, violating this policy, is regulated by Labor Code of the Republic of Tajikistan and shall be considered as violation of official duties by employees, that lead to financial damage and put to the risk reputation of the Bank.

### **13. Internal audit**

Acceptance of the obligation of management is the key moment in case of implementation of procedures on PPML/FT. The Bank shall train all its employees to compliance with internal procedures of accounting, promptness and closely control carried out operations.

Internal audit is an important instrument, through which the Bank may investigate risen suspicions, connected with money-laundering and financing of terrorism. Selfsame the Department of Internal audit is responsible for provision of carrying out by Compliance employee of the Bank of his duties in accordance with this policy.

The Department of Internal audit, depending on the situation includes into his working plan the section of compliance functions on the Bank and then he will report to Audit Committee and/or Board of Directors.

The copy of this report shall be submitted to the President of the Board, who will keep this report in the file, which in future will be available to external auditors.

### **14. External audit**

Compliance of the Bank to internal procedures on PPML/FT will be monitored once every year.

## *Appendix 1*

### **Information on international organizations on prevention of money-laundering FINANCIAL ACTION TASK FORCE (FATF)**

The **Financial Action Task Force on Money Laundering (FATF)** was established by the G-7 Summit that was held in Paris in 1989 for coordination of international measures to combat money laundering and terrorism financing. The primary task was to develop Forty Recommendations for implementing measures by national governments for initiation of effective programs to combat money laundering and terrorism financing.

FATF membership include 30 countries and jurisdictions, covers main financial centers of Europe, North and South America and Asia. FATF members are also European Commission and Gulf Co-operation Council.

#### Members of FATF:

1. Argentina
2. Australia
3. Austria
4. Belgium
5. Brazil
6. Canada
7. Denmark
8. European Commission
9. Finland
10. France
11. Germany
12. Greece
13. United Arab Emirates
14. Hong Kong, China
15. Iceland
16. Ireland
17. Italy
18. Japan
19. Luxembourg
20. Mexico
21. Kingdom of the Netherlands
22. New Zealand
23. Norway
24. Portugal
25. Russian Federation
26. Singapore
27. South Africa
28. Spain
29. Sweden
30. Switzerland
31. Turkey
32. United Kingdom
33. USA

## Appendix 2

### THE LIST

**Of the States and Territories providing preferential tax treatment and (or) not requiring disclosure and furnishing of the information to the banking supervisory boards (offshore zones)**

1. Anguilla
2. Andorra
3. Netherlands Antilles
4. Antigua
5. Aruba
6. Republic of Samoa
7. Commonwealth of Bahamas
8. Barbuda
9. Kingdom of Belgium
10. Belize
11. Bermudas
12. British Virgin Islands
13. Guatemala
14. Grenada
15. Commonwealth of Dominica
16. Turks And Caicos Islands (United Kingdom territory)
17. Republic of Liberia
18. Principality of Liechtenstein
19. Cayman Islands (United Kingdom territory)
20. Costa Rica
21. Republic of Marshall Islands
22. Isle of Man (United Kingdom territory)
23. Principality of Monaco
24. Montserrat (United Kingdom territory)
25. Republic of Cyprus
26. Republic of Nauru
27. Republic of Niue
28. Gibraltar (United Kingdom territory)
29. Republic of San Marino
30. Saint Kitts and Nevis
31. Saint Lucia
32. Saint Vincent and Grenadines
33. Republic of Vanuatu
34. Oriental Republic of Uruguay
35. Cook Islands (New Zealand)

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The Supervisory Board  
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Minutes No. 15/2012  
28.09 2012

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## REGULATION ON PREVENTION OF MONEY-LAUNDERING AND FINANCING OF TERRORISM (PPML/FT)

2. Areas of increased risk:

- hotels, excursion agencies, travel agencies;
- transport / export companies;
- companies / dealers on precious metals;
- offshore corporations;
- securities / broker services / insurance companies;
- dealers on provision of new / utilized cars / trucks / water and air transport;
- clubs with provision of utilized overflight speed cards;
- any business, connected with intensive cash flow, business relevant to:
  - drug transportation / production;
  - financial terrorism;
  - collection of confidential banking information;
  - emerging areas of activity where convertible currency is widely used.

3. Bank products with high risk

Officials may easily abuse all banking products, that are used for cash conversion into implements allowing quickly make a quick payment.

Products, identified as easily abused and products with high risk mainly include:

- traveler checks / bank expenditures;
- opening of a large number of deposit accounts by one client, the general amount of funds on them is huge and in future will be transferred on the account of another client, most indicative for this client, request enlargement of big amounts of banknotes of small denomination and reverse

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