

**This document has been translated for knowledge, but for legal purposes the Arabic version is adopted.**

## **Annex (2)/A**

### **Suspicion indicators for money laundering operations**

- 1- Through cash financial transactions, which can take any of the following forms:
  - A financial transaction with a value that exceeds twenty thousand JOD or its equivalent in foreign currencies. Financial transactions that are less than this limit and evidence indicates that they are linked transactions are considered as a single financial transaction.
  - Extraordinary large cash deposits made by a natural or legal person whose normal business activities are usually made through checks or other payment modes.
  - Huge increase in the cash deposits of any person with no justified reason, especially if the said deposits are transferred to a party with no obvious connection to said person and within a short period of time.
  - Depositing substantial amounts of money over different periods where the value of each of the said amounts is less than the limit stated at the beginning of this appendix but the sum of which exceeds that limit.
  - Deposits of substantial amounts of money over different periods where the sum forms huge amounts.
  - Concentration on cash deposits and withdrawals instead of using banking transfers or other tradable instruments without justification.
  - Exchanging substantial amounts of small denomination banknotes with large ones without justification.
  - Depositing substantial amounts of money using ATMs to avoid direct contact with the bank's staff, especially if said deposits are not in conformity with the business and/ or ordinary income of the concerned customer or nature of business thereof.
  - Performance of many large cash deposits by the customer with different branches of the bank or by many persons on behalf of the customer at the same day.
  - The customer brings packed ( sealed) cash from other banks and refuses to provide the bank with his account statement with the bank from which the amount is withdrawn .
  - Large amounts of cash deposits in the form of counterfeited, worn or old banknotes.
  - Sudden withdrawal of customer's balances without justification.
  - Withdrawing the company's capital (the value of the amount deposited in the account) after obtaining a letter from the bank stating that each partner's share of the company's capital has been deposited, after completing the company's registration procedures. This may give an indication that the company is a front for purposes other than those registered with the Companies Control Department.

- Corporate accounts are funded through deposits and incoming transfers and are followed by cash withdrawals that are not consistent with peers.
- 2- **Through persons' accounts, which take any of the following forms:**
- Keeping different accounts by the customer and depositing cash amounts in each one where the sum of which reaches a large amount that is inconsistent with the nature of business thereof, except for customers whose nature of business requires having more than one account.
  - The existence of accounts the transactions of which are inconsistent with the nature of customer's business. The said accounts are used to receive and/ or distribute substantial amounts for an ambiguous or irrelevant purpose to the holder of the account or to the nature of business thereof.
  - Keeping various accounts with different banks within the same geographical area and transferring the balances of the said accounts to one account then transferring the accumulated amount outside the kingdom.
  - Depositing third party checks with substantial amounts that are endorsed to the account holder but are inconsistent with the relation with the holder or nature of business thereof.
  - Effecting large cash withdrawals from an account that was previously dormant or withdrawals from which are relatively small, or from an account to which substantial amounts were unexpectedly transferred from the outside.
  - Depositing amounts by a large group of people in the same account with no acceptable explanation.
  - Presenting financial statements by the customer for his/ her business activity that are clearly different from those of similar entities operating in the same field.
  - Presenting financial statements unaudited and unapproved by a chartered auditor by entities with relatively large businesses.
  - Inaction of entities that usually accept their customers' checks toward making any large cash withdrawals in return of depositing the said checks, which indicates that there are other sources of income.
  - The occurrence of major change in the manner of running the customer's account that is inconsistent with the data thereof.
  - Entities or companies whose accounts demonstrate small or irregular activity.
  - The value of the transactions is inconsistent with customer identification information, his activity with the bank and the source of income.
  - Several accounts for several unrelated individuals with mutual addresses (phone number, mailbox, place of residence, apartment ... etc.)
  - High risk Customers (local / foreign politicians) refuse to declare their positions when opening an account with the bank.
  - The insurance company does not provide the documents proving that the customer had paid the insurance premiums of the policy that were paid to him

through the insurance company account due to the fulfillment of the policy payment terms.

- The failure of the insurance company to provide the bank with contracts signed with clients that justify the transactions to and from the company's accounts.
- The customer shows that he has new banking relationships with a number of banks in preparation for opening a specific account with the bank.

### **3- Through transfers, which take any of the following forms:**

- Directly transferring the amounts deposited in the account outside, whether in one or several payments.
- Transfers with similar amounts (on weekly or daily basis), the total of which is large.
- Effecting transfers to a person who has no account with the bank using various payment instruments all of which are below the limit stipulated for in these instructions.
- Incoming transfers accompanied by instructions to transfer the amount of which into checks and send them by mail to a person with no account with the bank.
- Effecting transfers with substantial amounts to countries known for their banking or tax confidentiality.
- Beneficiary using the amount of transfers credited to his/ her account for buying various cash instruments immediately upon receiving said transfers to pay another party.
- An account receiving unprecedented transfers with substantial amounts that are inconsistent with customer's nature of business.
- Frequently effecting external transfers of funds, which are pretended to be from an international source, by the customer.
- Depositing instruments by the customer into his/ her account and then transferring the same to third parties.
- Performing extraordinary transfer within a set of ordinary transfers that are performed as one transfer (batch transfer)
- Transfer of significant amounts outside the Kingdom or receiving the same form outside accompanied with instructions to be paid in cash.
- Transfer from the insurance company to clients justified against a matured insurance policy for which paying conditions are fulfilled.

### **4- Through safe boxes, which take any of the following forms:**

- Keeping several safe boxes by the customer with no justified reason.
- Using safe boxes recurrently; a fact which indicates that the customer keeps substantial amounts of money in the said boxes.
- Visiting the safe boxes repeatedly by the customer before or after making cash deposits less than the limit stated for in this appendix.

- Increased frequency of customer's visits to safe boxes in an apparently strange manner compared to his usual previous visits entry .

**5- Through investment-related transactions, which take any of the following forms:**

- Purchasing securities to keep in the safe boxes with the bank although such act is inconsistent with the customer's business or status.
- Neglecting the ordinary decisions to be made with regard to investment accounts such as fees or proper investment instruments by the customer.
- Liquidating a large financial position by the customer through a series of small cash transactions.
- Making cash deposits, payment orders, traveler's checks or counter checks by the customer with amounts less than the limit stipulated for in this appendix to finance an investment account.
- Using investment accounts by the customer as a means of transferring funds to external parties, especially off-shore.
- Entering substantial amounts of money from outside to be invested in foreign currencies or securities, when said investment is inconsistent with the customer's nature of business.
- Attempting to present the financial transactions in more complex manner than it requires by using sophisticated terms such as, hedging, prime banknotes, stand by commitment, contracts, and arbitrage.

**6- Through credit facilities, which take any of the following forms:**

- Applying to obtain facilities for external or off-shore companies or applying for facilities guaranteed by external or off-shore banks.
- Sudden settling of a personal large debt by the customer without a clear and reasonable explanation of the source.
- Purchasing deposit certificates by the customer and using them later as a guarantee to repay the facilities.
- Obtaining credit facilities guaranteed by cash deposits.
- Obtaining credit facilities guaranteed by cash collaterals abroad.
- Transferring the amount of facilities obtained by the customer in an unexpected manner abroad.
- Settling a debt by the customer before maturity and with amounts larger than anticipated.
- Applying for facilities in return of pledging assets belonging to a third party where the bank does not know the source of the said assets or that their size is inconsistent with the customer's financial position.

- Applying for facilities or for a financing arrangement by the customer with third parties where the customer's financial contribution in the said financing is not known.
- Applying for facilities in return of withholding the deposits of a company or off-shore affiliates, especially if they were in countries known for being producers and/ or traffickers of drugs.
- Circumstances surrounding the application for credit facilities that lead to the bank's rejection of granting said facilities because of suspecting the validity of the guarantees.
- Presenting financial statements by the customer, which are inconsistent with the accounting standards.

**7- Through financing commercial transactions and letters of credit, which take any of the following forms:**

- Requesting commercial financing by the customer, whether to export or import basic items with quoted prices that are clearly and substantially different from those existing in a similar market.
- Issuing letters of credit or guarantee letters for tenders according to customer's request without having contracts for existing projects or for the interest of extraordinary beneficiary.
- Changing the name of the beneficiary for the letter of credit by the customer within a short period of time before the payment.
- Changing the place of payment in the letter of credit by the customer to an account in a country other than that of the beneficiary's.
- The beneficiary of the letters of credit is a company owned by the customer, or the shipping companies are owned by the same customer.
- Amounts stated in the letters of credit submitted by the customer to the bank or customs department do not match the original documents.

**8- International banking and financial transactions, which take any of the following forms:**

- Acknowledging the identification of a person by external bodies existing in countries known for being producers and/ or traffickers of drugs.
- Having large balances inconsistent with the size of business activities of the customer in addition to frequent transfer to account(s) abroad.
- Conducting banking transactions with off-shore banking units whose names are similar to legitimate and reputable financial institutions.

**9- Through Electronic financial services, which take any of the following forms:**

- An account receiving small electronic financial transfers then making large transfers in the same manner to another country.
- Depositing substantial amounts regularly in different methods including electronic deposit, or receiving substantial amounts regularly from countries known for being producers and/ or traffickers of drugs.
- Requesting to open an account via the internet by the customer and refusing to provide the required information to complete the process or refusing to provide information that usually grants the customer access to services and facilities, which the ordinary customer considers a plus.
- Using internet banking by the customer to transfer between accounts for many times and for unjustified reasons.

**10: Through Customer Behaviors**

The following behaviors by the customer constitute an indicator of his/ her involvement in unlawful transactions:

- Customers requesting the bank information about/ inquiring about records, systems, regulations in order to be acquainted with enough information about the money laundering transactions and to avoid legal violations related thereto.
- Customer discomfort and unwillingness to go through a certain financial transaction when he/ she is informed that said transaction is required to be reported in detail to the competent bodies.
- A customer acting in an odd manner such as not exploiting the chance of receiving high interest on a large balance in addition to being ignorant about the basic details of a financial transaction.
- A temperamental customer who refuses to provide the bank with identification documents.
- A customer who is still a student and irregularly sends or receives transfers or exchanges substantial amounts of currencies that are inconsistent with his/ her status.
- A customer who, at the time of visiting the Bank, is controlled by someone else and is unaware of his /her actions or is old aged and accompanied, at the time of the relevant transaction, by someone who is not in any way related to him/ her.
- A customer offering unjustified substantial amounts or precious gifts to the bank staff to persuade the same not to verify the identification documents and other documents.
- A customer providing suspicious identification documents and refusing to provide the bank with his/ her personal information.
- A customer providing the bank with a permanent address that is outside the area of banks' services or outside the Kingdom.
- A customer refusing to disclose the details of his/ her business activities or the data, information or documents related to his/ her company.

- A customer whose home, business, or mobile phones are disconnected.

### **11: Through the Bank employee's behavior**

The following behaviors by the bank's staff constitute an indicator of his/ her involvement in unlawful transactions:

- Increase in the living standards and level of expenditures of the bank's staff in a noticeable and sudden manner that is inconsistent with his/ her monthly income.
- Bank's staff assisting in the effecting transactions where the ultimate beneficiary or corresponding party is not fully known.
- Bank's staff frequently violating control procedures and adopting a manipulative policy.
- Bank's staff overestimating the credibility, ethics and financial sources of a customer in his/ her reports referred to the bank's management.
- Bank's staff avoiding any vacations or frequent visits to the bank through his/ her annual leave.
- The employee exploits his/ her account and the powers granted to him/ her or his/ her position to implement transactions that do not comply with the Code of Professional Conduct.
- The employee accesses and executes transactions on the accounts belonging to clients or his/ her relatives through fraudulent judicial delegations / agencies