# THE INSTITUTE OF BANKERS, BANGLADESH (IBB) 6th Banking Professional Examination, 2025 AIBB

FINANCIAL CRIME AND COMPLIANCE (FCC)

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Subject Code:	2	0	7

Time—3 hours Full marks—100

Pass marks 45

[N.B. The figures in the right margin indicate full marks. Answer the questions as mentioned in different parts.]

### Part A-Broad question

(Answer any two)

Marks-20×2=40

<ul> <li>(b) Describe the responsibilities of MD/CEO and Chief Anti Money Laundering Comp Officer (CAMILCO) of a bank in preventing Money Laundering (ML) and Terrorist Financing</li> <li>3. (a) What are the roles and responsibilities of Bangladesh Financial Intelligence Unit (BFII preventing ML and TF?</li> <li>(b) Mention the authorities and power of BFIU delineated in Money Laundering Prevention 2012 and Anti Terrorism Act 2009.</li> <li>4. (a) 'Credit Back Money Laundering (CBML) is source of proceeds of crime and proce launder those proceeds of crime"—Explain with example.</li> <li>(b) Describe some red flags/indicators of Trade Based Money Laundering (TBML).  Part B—Thought Provoking/Practical Oriented Question (Answer any one)  Marks—10×1=10</li> <li>5. (a) A person having no account in your branch approached you to import refined sugar unger from UAE though LC just before the month of Ramadan—What you will do as a branch mana (b) Your branch has received USD 5,00,000 00 from a bank in China as export proceed. Buying House against the export of RMG in a OFAC sanctioned country. Havin knowledge that your bank are facing severe FX crisis and BB is allowing 3rd country paywhat you will do?</li> <li>6. (a) Officer in Charge (OC) of a police station requested you through letter to provide information of your valued client Mr. X as they are investigation a fraud case against What you will do to response the letter?</li> <li>(b) Department of Narcotics Control (DNC) request you to provide bank information of customer. What kind of review you will do in response to that request?  Part C—Case Study (Answer any one)  Marks—20×1=20</li> <li>7. ABC Private Ltd. Company approach a bank to import a live vessel from Cayman Islands the value of 40 million USD and requested to Principal branch of that bank to sent a propos same day as the board meeting will be held just next day. Before receiving the request one official of that bank, know to very close with chainman of that bank requested the brananger to sent the propos</li></ul>			2012	
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advance payment bank received the shipping documents and made payment on same day as per the instruction of the head office. Currently bank branch is pursuing bill of entry of the imported

vessel and approached to customer directly they cannot trace the importer.

[Please turn over

			Mark
	(a)	What are the due diligence required before on boarding such kind of big customer?	4
	(b)	What kind of document are required to sent a proposal to import a live vessel from a high risk jurisdiction?	
	(c)	What kind of due diligence are required about the supplier, APG provider bank and exporters bank?	
	(d)	What are the steps available for bank to do in this case now?	4
	(a)	What are the red flags you should mention in STR reporting?	4
8.	Bar tho par Tra star 202 per UA	nk M received LC from a bank registered in Jersey to import leather goods and destination of see goods is India. Bank's customer Mrs NI Trading usually do business, like importing spare ts and some trading items mainly from China. In reviewing import performance of Mrs. NI ading it was revealed that its highest import was 5 lac USD in the year of 2023. However, reting export business in 2022 its export performance is USD 50,000 in 2022; 5 million in 23, 18 milion in 2024 and it has received 34 crore taka as cash incentive. Its export formance is expecting to be 50 million in 2025. Importer is Mrs MI Corporate registered in E and most of the export proceeds realised from UAE and Singapore.	
	(a)	How the bank should evaluate Mrs NI Trading's business performance and is there any risk factors for the bank?	5
	<i>(b)</i>	What are the red flags/indicators bank should consider to continue business with this customer?	4
	(c)	What kind of documents banks should collect as part of its due diligence?	4
	(d)	What you will do in the situation and why?	7
	•	Part D— Understanding Terminology (Answer any five) Marks—2×5=10	
9.	(a)	Risk based approach vs Rule based approach of AML and CFC.	
	<b>(b)</b>	Money laundering vs Terrorist financing.	
·		Politicaly Exposed Persons (PEPs) vs Influential Persons (IPs).	
	(d)	Cash Transaction Report (CTR) vs Suspicious Transaction Report (STR).	
	(e)	Investigating Authority vs Intelligence Agency.	
	<b>(f)</b>	Know your customer's customer.	
		Customer due dilligence vs Enhance due dilligence.	
	(h)	Roles of Asia Pacific Group on ML and Egmont Group of FIU.	
		Embargo vs Targeted Financial Sanction (TFS).	
	(j)	Complete and correct information about customer.	
		Part E—Short Question (Answer all the questions) Marks—2×10=20	
10	. (a)	What are the four responsibilities of reporting organization under Section 25(1) of MLPA, 2012?	
	(b)	What are the penal provision for violation of Section 25(1) of MLPA, 2012 and Section 25(2) of that Act?	
	(c)	What is Shell Bank?	
	(d)	Who is/are the beneficial owner of a bank account?	
	(e)	What is 'fit and proper test' for the ownership of a financial institution?	
	<b>(f)</b>	How you verify the customer address?	
	(g)	Define 'tipping off' in the context of STR?	
	(h)		
	(i)	What are the stages of Money Laundering?	
	(1)	What is Virtual Assets and Virtual Assets Service Provider?	

## [বাংলা অনুবাদ]

দ্রষ্টব্য: ডান পাশের সংখ্যা প্রশ্নের পূর্ণমান জ্ঞাপক।]

# অংশ ক—রচনামূলক উত্তরের প্রশ্ন (যে কোনো দুটি প্রশ্নের উত্তর দিন)

মান—২০×২=8০

			-1 45
۱ د .	(ক)	"সকল মানিলভারিং অপরাধর্ষ আর্থিক অপরাধ ; কিন্তু সকল আর্থিক অপরাধ মানিলভারিং অপরাধ নয়"— উদাহরণসহ ব্যাখ্যা করুন।	. <b>১</b> c
	(খ)	বাংলাদেশে সংঘটিত বিভিন্ন প্রকারের আর্থিক অপরাধের বর্ণনা দিন।	30
२।	(ক)	একটি ব্যাংকের মানিলভারিং ও সন্ত্রাসে অর্থায়ন প্রতিরোধ বিষয়ক পরিপালন কাঠামো বর্ণনা করুন। অভ্যন্তরীণ নিরীক্ষা হতে কেন উক্ত পরিপালন কাঠামো স্বাধীন থাকা আবশ্যক?	30
	(খ)	মানিলন্ডারিং ও সন্ত্রাসে অর্থায়ন প্রতিরোধে একটি ব্যাংকের প্রধান মানিলন্ডারিং প্রতিরোধ পরিপালন কর্মকর্তা (ক্যামেলকো) ও প্রধান নির্বাহী/ব্যবস্থাপনা পরিচালকের দায়-দায়িত্ব বর্ণনা করুন।	\$0
৩।	(ক)	মানিলভারিং ও সন্ত্রাসে অর্থায়ন প্রতিরোধে বাংলাদেশ ফাইন্যান্সিয়াল ইন্টেলিজেন্স ইউনিট (বিএফআইইউ) এর দায়-দায়িত্ব কী কী?	30
	(খ)	উক্ত দায়িতৃসমূহ পরিপালনে মানিলভারিং প্রতিরোধ আইন, ২০১২ ও সন্ত্রাস বিরোধী আইন, ২০০৯ এ বিএফআইইউ এর কী ধরনের ক্ষমতার উল্লেখ রয়েছে?	30
8 1	<u>(ক)</u>	"ঋণ সংশ্লিষ্ট/ভিত্তিক মানিলভারিং অপরাধ লব্ধ অর্থের উৎস এবং তা লভার করার পদ্ধতিও বটে"—উদাহরণসহ ব্যাখ্যা করুন।	30
	(খ)	বাণিজ্যভিত্তিক মানিল্ভারিং চিহ্নিত করার কিছু নির্দেশক আলোচনা করুন।	30
		অংশ খ—চিম্ভার উদ্রেককারী ও বাস্তবতার নিরিখে উন্তরের প্রশ্ন	
		(যে কোনো একটি প্রশ্নের উত্তর দিন)	
		মান—১০×১=১०	
<b>٤</b> ۱	(ক)	পবিত্র রমজান মাসের ঠিক আগে আগে একজন আমদানিকারক যার কোনো হিসাব আপনার শাখায় নেই তিনি সংযুক্ত আরব আমিরাত হতে পরিশোধিত চিনি আমদানির জন্য আপনার শাখা হতে ঋণপত্র খুলতে চায়—শাখা ব্যবস্থাপক হিসেবে উক্ত আমদানিকারকের আবেদন মূল্যায়নে আপনি কী কী করবেন?	¢
		আপনার শাখায় একটি বায়িং হাউজের নামে যুক্তরাষ্ট্রে Office on Foreign Asset Control (OFAC) এর নিষেধাজ্ঞাভুক্ত একটি তৈরি পোশাক রপ্তানির আয় বাবদ চীনের একটি ব্যাংক হতে মা.ড. ৫,০০,০০০ জমা হয়েছে। আপনি জানেন আপনাদের ব্যাংকে বৈদেশিক মুদ্রার ঘাটতি/সংকট রয়েছে এবং বাংলাদেশ ব্যাংক তৃতীয় দেশ হতে রপ্তানি আয় গ্রহণ করার সুযোগ রেখেছে। আপনি এক্ষেত্রে কী করবেন?	¢
७।	(ক)	আপনার মূল্যবান গ্রাহক মি. এক্স এর বিষয়ে থানার ভারপ্রাপ্ত কর্মকর্তা (ওসি) পত্রের মাধীমে তথ্য চেয়েছে যেহেতু তারা আপনার গ্রাহকের বিরুদ্ধে জাল-জালিয়াতির মামলার তদন্ত করছে। আপনি উক্ত পত্রের জবাবে কী করবেন?	¢
		মাদকদ্রব্য নিয়ন্ত্রণ অধিদপ্তর আপনার ব্যাংকের গ্রাহকের তথ্য চেয়েছে। উক্ত অনুরোধের জবাব প্রদানে আপনি কী কী বিষয় মূল্যায়ন করবেন?	œ
		অংশ গ—কেস স্টাডি	
,		(যে কোনো এ <b>কটি প্রশ্নে</b> র উত্তর দিন) মান—২০×১=২০	·
۹1	জাহা কার্যা আবে নিক্ট	স প্রাইভেট লি, কোম্পানিকে ম্যান আইল্যান্ড থেকে মা.ড. ৪০ মিলিয়ন মূল্যের সমুদ্রে চলাচল উপযুক্ত একটি জ আমদানি করতে চায় এবং সে মোতাবেক একটি ব্যাংকের প্রিঙ্গিপাল শাখাকে একই দিনে আবেদনটি প্রধান লয়ে অনুমোদনের জন্য প্রেরণের অনুরোধ করে, কারণ তার পরের দিন উক্ত ব্যাংকের পর্যদ সভা অনুষ্ঠিত হবে। দেনটি শাখায় গ্রহণ করার পূর্বেই প্রধান কার্যালয়ের একজন উর্দ্বতন কর্মকর্তা যিনি ঐ ব্যাংকের চেয়ারম্যানের ইজন হিসেবে পরিচিত, শাখা ব্যবস্থাপককে উক্ত আবেদন প্রধান কার্যালয়ে প্রেরণের অনুরোধ করেন। পলের দিন	
	মিলি মিলি পরি পরি আমা	সভা শেষ হওয়ার কিছুক্ষণের মধ্যে শাখা প্রধান কার্যালয়ের মঞ্জুরিপত্র (Sanction Letter) গ্রহণ করে এবং ৪০ রন মা.ড. মূল্যমানের ঋণপত্র স্থাপন করে বাতে এডভাঙ্গ পেম্যান্ট গ্যারান্টি (এপিজি) এর বিপরীতে মা.ড. ৫ রন অগ্রিম পরিশোধ করা এবং অবশিষ্ট অর্থ ক্লিন শিপিং বিল প্রাপ্তি সাপেক্ষে পরিশোধ করার শর্ত রয়েছে। অগ্রিম শাধের ১০ (দশ) দিনের মধ্যে শিপি বিল গ্রহণ করে এবং প্রধান কার্যালয়ের নির্দেশনা মোতাবেক সে দিনই মূল্য শোধ করে। শাখা বর্তমানে বিল অব এন্ট্রি সংগ্রহের জন্য সংগ্রিষ্ট কাস্টমস হাউজের সাথে যোগাযোগ করছে কারণ নানিকারকের সাথে শাখা যোগাযোগ করতে পারছে না।	
	<b>(季</b> )	এ ধরনের বড় বড় আমদানিকারকে গ্রাহক হিসেবে গ্রহণ করার পূর্বে কী ধরনের সতর্কতামূলক ব্যবস্থা গ্রহণ আবশ্যক?	8
	(খ)	একটি উচ্চ ঝুঁকিপূর্ণ দেশ হতে সমুদ্রে চলাচল উপযোগী জাহাজ আমাদানির প্রস্তাবে কী কী দলিলাদি সংগ্রহ করা আবশ্যক?	8
		এপিজি প্রদানকারী ও রপ্তানিকারকের ব্যাংক সম্পর্কে কী ধরনের সতর্কতামূলক ব্যবস্থা গ্রহণ আবশ্যক?	8
		আলোচ্য কেসে ব্যাংকের এখন কী কী করণীয় রয়েছে?	8
	(&)	সন্দেহজনক লেনদেন রিপোর্টে আপনি কী কী নির্দেশক উল্লেখ করতে পারেন?	8

[পর পৃষ্ঠা দ্রষ্টব্য

- ৮। জার্সিতে নিবন্ধিত একটি ব্যাংক হতে বাংলাদেশি 'ব্যাংক এম' একটি ঋণপত্র গ্রহণ করে যাতে ভারতে চামড়াজাত পণ্য রপ্তানির উল্লেখ রয়েছে। উক্ত ব্যাংকের গ্রাহক মেসার্স এন আই ট্রেডিং সাধারণত চীন হতে খুচরা যন্ত্রাংশ ও অন্যান্য বাণিজ্যিক পণ্য আমদানি করে থাকে। মেসার্স এন আই ট্রেডিং এর পূর্ববর্তী কার্যক্রম মূল্যায়নে দেখা যায় যে, ২০২৩ সালে প্রতিষ্ঠানটি সর্বোচ্চ ৫ লক্ষ মা.ড মূল্যমানের পণ্য আমাদানি করেছে। কিন্তু ২০২২ সালে রপ্তানি বাণিজ্য শুক্ত করে প্রতিষ্ঠানটি ২০২২ সালে ৫০,০০০ মা.ড. ২০২৩ সালে ৫০,০০০ মা.ড, ২০২৪ সলে ১,৮০,০০,০০০ মা.ড. আয় করে এবং নগদ সহায়তা বাবদ সরকার হতে ৩৪ কোটি টাকা গ্রহণ করে। ২০২৫ সালে তার রপ্তানি আয় ৫ কোটি মা.ড. দাঁড়াবে বলে আশা করা যাছেছে। জার্সিতে নিবন্ধিত ব্যাংক হতে আমদানি ঋণপত্র স্থাপন করা হলে আমদানিকারক মেসার্স এমআই কর্পোরেট সংযুক্ত আরব আমিরাতে নিবন্ধিত প্রতিষ্ঠান এবং অধিকাংশ রপ্তানি আয় সংযুক্ত আরব আমিরাত ও সিংগাপুর হতে পরিশোধিত হয়েছে।
  - (ক) ব্যাংক কীভাবে মেসার্স এন আই ট্রেডিং এর ব্যবসায়িক কার্যক্রম মূল্যায়ন করবে এবং এক্ষেত্রে কি ব্যাংকের জন্য কোন ঝুঁকি রয়েছে?
  - (খ) আলোচ্য রপ্তানিকারকের সাথে ব্যবসায়িক সম্পর্ক চালিয়ে যাওয়ার ক্ষেত্রে ব্যাংক কী কী রেড ফ্লাগ/নির্দেশনা বিবেচনায় রাখবে?
  - (গ) ব্যাংক তার সতর্কতামূলক ব্যবস্থার অংশ হিসেবে কী কী দলিলাদি সংগ্রহ করবে?
  - (ঘ) এরপ পরিস্থিতিতে আপনি কী করবেন এবং কেন করবেন?

#### অংশ ঘ—পরিভাষা বোঝা (যে কোনো পাঁচটি প্রশ্নের উত্তর দিন)

#### মান—২×৫=১০

- ৯। (ক) মানিলভারিং ও সন্ত্রাসের অর্থায়ন প্রতিরোধে ঝুঁকিভিত্তিক উদ্যোগ বনাম বিধানভিত্তিক উদ্যোগ;
  - (খ) মানিলভারিং বনাম সন্ত্রাসে অর্থায়ন ;
  - (গ) পলিটিক্যালি এব্ধপোস্ড পার্সন বনাম প্রভাবশালী ব্যক্তি;
  - (ঘ) নগদ লেনদেন রিপোর্ট বনাম সন্দেহজনক লেনদেন রিপোর্ট;
  - (ঙ) তদন্তকারী সংস্থা বনাম গোয়েন্দা সংস্থা;
  - (চ) গ্রাহককে জানা বা চেনা (KYC) বনাম গ্রাহকের গ্রাহককে জানা/চেনা (KYCC);
  - (ছ) গ্রাহকের সতর্কতামূলক ব্যবস্থা বনাম অধিকতর সতর্কতামূলক ব্যবস্থা;
  - (জ) এশিয়া প্যাসিফিক গ্রুপ অন মানিলভারিং ও এগমন্ট গ্রুপ অব এফআইইউ;
  - (ঝ) সার্বিক নিষেধাজ্ঞা বনাম নির্দিষ্ট আর্থিক নিষেধাজ্ঞা;
  - (এঃ) গ্রাহকের সাঠিক ও পূর্ণাক্তা তথ্য।

## অংশ ৬—সংক্ষিপ্ত উত্তরের প্রশ্ন (সকল প্রশ্নের উত্তর দিন) মান—২×১০=২০

- ১০। (ক) মানিলভারিং প্রতিরোধ আইন, ২০১২ এর ২৫(১) ধারায় উল্লিখিত রিপোর্ট প্রদানকারী সংলাপের ৪ (চার)টি দায়িত্ব কী কী?
  - (খ) উক্ত আইনের ২৫(১) ধারা লজ্মনের কী কী শান্তির বিধান রয়েছে উক্ত আইনের ২৫(২) ধারায়?
  - (গ) শেল ব্যাংক কী?
  - (ঘ) একটি ব্যাংক হিসাবের কে বা কারা প্রকৃত সুবিধাভোগী?
  - (ঙ) আর্থিক প্রতিষ্ঠানের মালিকানার ক্ষেত্রে 'Fit and Proper Test' কী?
  - (চ) আপনি কীভাবে গ্রাহকের ঠিকানা যাচাই করবেন?
  - (ছ) সন্দেজনক লেনদেন রিপোর্টের ক্ষেত্রে 'গোপন তথ্য ফাঁস' কীভাবে সংজ্ঞায়িত করবেন?
  - (জ) 'গ্ৰাহক নিৰ্বাচন নীতিমালা' কী?
  - (ঝ) মানিলভারিং প্রক্রিয়ার ধাপগুলো কী কী?
  - (এ) ভার্চুয়াল এসেট ও ভার্চুয়াল এসেট সার্ভিস প্রোভাইডার কী?