
継続的顧客管理に関する海外状況調査報告書

※ 本報告書は、全銀協が事務局を務める「AML/CFT 態勢高度化研究会」が
KPMG あずさ監査法人に調査を依頼し、取りまとめたものである。¹

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AML/CFT 態勢高度化研究会

(事務局：一般社団法人 全国銀行協会)

¹ 本報告書は、AML/CFT 態勢高度化研究会（事務局：一般社団法人全国銀行協会）の委託により有限責任 あずさ監査法人が実施した調査結果を取りまとめたものである。有限責任 あずさ監査法人は、調査時点で入手した情報に基づき本報告書を適時に取りまとめるよう努めているが、本調査報告書の内容は、本調査の対象に含まれない特定の個人や組織が置かれている状況に対応するものとは限らず、また、情報を受け取った時点及びそれ以降において、その情報の正確性や完全性を保証するものではない。また、本報告書は委託者であるAML/CFT 態勢高度化研究会（事務局：一般社団法人全国銀行協会）に対してのみ提出したものであり、本報告書を閲覧あるいは本報告書のコピーを入手閲覧した第三者の本報告書の利用に対して、有限責任 あずさ監査法人は直接ないしは間接の責任を負うものではない。

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1. 調査の目的等

1.1. 目的

2021年7月開催のAML/CFT 態勢高度化研究会において、研究方針として「実効性のある継続的顧客管理およびリスクベースの取引モニタリングの在り方」に優先的に焦点を当て、継続的顧客管理に関して、例えば海外のマスリテール金融機関における、顧客属性データの取得・更新を効率的に実行する方法の研究等を実施する旨合意された。

継続的顧客管理は、(a)「顧客属性データの取得・更新」、(b)「取得・更新された顧客属性データ等を踏まえた顧客リスク評価の見直し」、(c)「そうしたリスク評価に基づくリスクベースのモニタリング・顧客対応」の3段階に分けて考えることができる。本調査は、このうち(a)に焦点を当てるものである。

上記(a)の段階で、我が国の銀行が困難な課題に直面していることを踏まえ、それらの課題への対処策を検討する材料を整理することを目的として「海外のマスリテール金融機関における顧客属性データの取得・更新を効率的に実行する方法」について研究することとした。

1.2. 背景

我が国の銀行が、「顧客属性データの取得・更新」の段階で直面している課題は、以下の通りである。

- ① 郵送しても「**あて所に尋ねあたりません**」として、返送されてしまう
- ② 届いても**回答しない**
- ③ **苦情**が多く寄せられる
- ④ 回答あったものについても、**書類不備**などがある
- ⑤ 書類不備確認、顧客対応、入力などの対応（あるいは事務委託のコスト）の**負担が重い**

1.3. 仮説

海外のマスリテール金融機関は 1.2 で示した課題を抱えていない、もしくは抱えているとしてもその程度が少ないという可能性を想定しながら、以下の仮説を立てた。

仮説 1 海外では、顧客との間でのやりとりが電子メールや Web アプリなどが普通。従って、手紙が届かないことによる問題が無い。また電子メールや Web アプリで連絡が取れない顧客との間では、取引の一時停止・中断が広く行われ、また顧客からもそれが受け入れられている。

- 仮説 2** 海外の（一部の）国では、デジタル ID が普及しており、一定期間の経過などで継続的顧客管理が必要となった顧客に対しては、デジタル ID の提示を求め、それとともに当該顧客の最新時点での住所等の情報取得が可能となっている。
- 仮説 3** 海外では、消費者は日本のように多くの銀行口座を保有することがない（もしくは銀行口座を保有できない Un-banked 層が相応に多い）。日本では、口座維持手数料徴収が一般的ではないこともあり、あまり使用されないままに、多くの口座を保有し続けるケースが多い。このような口座を対象に継続的顧客管理が行われる場合、利用者は煩わしいと感じ、回答のインセンティブは低くなる。
- 仮説 4** 海外では、口座を持つ銀行に自らの最新情報を更新しておかないと口座取引の停止を受けることがむしろ当たり前と考えられており、そのため、顧客が銀行に自らの最新情報を提供することに抵抗や遅滞が生じにくい。（例えば、インドでは RBI の通知の 2.8 で「顧客が非協力的であるために KYC ができないときには、口座閉鎖や取引停止を検討すべきこと」とされており、実際に口座閉鎖や取引停止が頻繁に行われている。）
- 仮説 5** 海外では、SDD の範囲（FAQ で示されたリスクに応じた簡素な顧客管理）が日本よりも広く認められており、定期的な CDD に応じなければいけない顧客層が相対的に少ない。
- 仮説 6** 国民文化（消費者の考え方、姿勢）の違いということが考えられる。日本では、自らの苗字や住所など基本的な情報についても「なるべく他者」に伝えない傾向が強い。
- 仮説 7** 海外では、既存顧客が最新の顧客情報を銀行に提供しやすくする、ないしはせざるを得ないようなインセンティブを銀行が与えている。

2. 調査方法

2.1. 調査方法

調査は 2021 年 8 月時点で入手可能な情報を基に実施した。KPMG あずさ監査法人が上記 1.3 の仮説それぞれについて可能な範囲内でデスクトップリサーチを実施し、その後 KPMG 海外メンバーファームに対し、以下の調査観点で彼我の違いとその背景・理由について意見交換を行い、仮説を踏まえながら調査結果をとりまとめ、我が国の継続的顧客管理の課題解消の方向性について整理した。

なお、海外メンバーファームとの意見交換は当該ファームへの再委託費用が発生しない範囲内で実施した。

2.2. 調査観点

調査の観点は次のとおりとした。

1. 既存顧客についての最新の情報の取得について、当該国が難しさを抱えているか

2. 既存顧客への連絡手段（手紙・電子メール・Web アプリその他）
3. 情報更新について非協力的な顧客に対する取引制限の中断・停止措置の使われ方、顧客の受け止め方、根拠となる法令・規制当局の指導（指針）・規制状況、銀行と顧客の間の約款の中の条文の存在など（取引制限がかけやすい環境・仕組みの存否）
4. デジタル ID の普及に伴う顧客の最新情報の取得しやすさ
5. 消費者にとっての銀行口座の数の多寡と銀行に対する情報提供の姿勢への影響
6. 口座維持手数料の存否
7. 銀行顧客の最新情報の記録について、顧客自身が銀行の website で upload するなどの方法が広く使われ、銀行にとっての手間の削減につながっているか
8. 取引データから KYC プロセスに必要かつ有益な情報を抽出する仕組み（システム）を構築しているか（例えば給与所得者か、年金生活者かなど）
9. 既存顧客についての最新の情報の取得について、銀行が難しさを抱えている場合の個別銀行や銀行業界としての対処策（金融機関からの更新情報依頼への回答に関する利用者へのインセンティブの有無を含む）

2.3. 調査対象国

①グローバルまたは地域的な金融市場としての位置付け、②AML/CFT 遵守体制の成熟度、③CDD のためのデジタル ID の普及を踏まえ、次の 8 カ国を調査対象国とした。

米国（米）、英国（英）、ドイツ（独）、スウェーデン（瑞）、オーストラリア（豪）、香港（香）、シンガポール（星）、インド（印）

3. 調査結果概要²

2.2 の調査観点それぞれにつき、海外の状況と我が国の状況を比較し、異なる点・共通点を示す。

#	観点	日本の状況	海外（意見交換先）の状況
1	既存顧客についての最新の情報の取得について、当該国が難しさを抱えているか	<p>✓ 我が国の銀行、「顧客属性データ取得・更新」段階で苦労している点は以下通り。</p> <p>① 郵送しても「あて所に尋ねたりません」として、返送されてしまう</p> <p>② 届いても回答しない</p> <p>③ 苦情が多く寄せられる</p> <p>④ 回答あったものについて、書類不備などがある</p> <p>⑤ 書類不備確認、顧客応対入力などの対応（あるいは事務委託コスト）の負担が重い</p>	<p>✓ 「難しさを抱えていない」とする国が4カ国（英、瑞、豪、星）、「さほど難しさを抱えていない」とする国が4カ国（米、独、香、印）だった。</p> <p>（「難しさを抱えていない」とする国の例）</p> <ul style="list-style-type: none"> ▪ 英の大多数の銀行は、顧客の情報、例えば氏名・住所・生年月日・国籍について、最新で知り得た情報が記録されているものと違う場合を除き、低リスク顧客に継続的顧客管理を対象としない。さらに、上記の情報を取得するために、銀行は顧客に直接連絡するのではなく、第三者の情報源³に依存して情報を検証する。 ▪ 瑞は、「約5年前には最新の顧客情報を得るのに苦労していたが、その後状況が大きく変化し、現時点では難しさを抱えていない」とのこと。最近約5年間の変化は次の3点。①同国やEU域内で複数の大型MLスキャンダルが発生する中で規制監督当局の対応厳格化と、この問題と対応の必要性への消費者の理解が進展。②消費者のオンラインバンキング利用の拡大。③消費者によるデジタルID使用のさらなる拡大。 <p>（「さほど難しさを抱えていない」とする国の例）</p>

² 各国メンバーファームに対するヒアリング記録は Appendix 2 のとおり。

³ **英**には（銀行や顧客からみて第三者である）サービスプロバイダー（例えば信用情報会社としての Experian や Equifax、フィンテック会社として Onfido や Jumio）が提供する電子的な「身分証明と確認（ID&V）」サービスを銀行が使用している。そこでは、政府の記録（例：選挙人名簿、国勢調査データ、裁判所の記録等）、公表されている情報源（例：電話帳情報等）、または参加銀行などから多数のデータセットにアクセスし、名前、住所、生年月日の情報を取得することが可能（同意を事前に得た顧客を対象）。

この方式を用いることにより、銀行は顧客に直接連絡するのではなく、第三者のサービスプロバイダーを通じて得た情報を用いて顧客情報を独立的に検証することが可能。

#	観点	日本の状況	海外（意見交換先）の状況
			<ul style="list-style-type: none"> ▪ 米の顧客は銀行に情報を提供することを抵抗していない。歴史的に、顧客は顧客情報の機密性を維持するために銀行を信頼しており、さらに、9・11 のテロ事件及びの後の対テロ戦争の影響によって、テロ資金供与と戦うことの重要性についての強い国家的な認識がある。 ▪ 独は、最新の顧客情報を得ることに一定の課題を抱えているが、①銀行が最新の情報を提供しない顧客の口座を閉鎖することを求める規制要件、②多くの顧客が低リスクに分類され、定期的なレビュースケジュールが緩和されている（7～10年）、③顧客が銀行からの情報提供依頼に慣れているという信頼の文化によって、この課題は大幅に軽減されている。 ▪ 香は、「約10年前には顧客の理解を得るのに苦労していたが、HKMAの厳しい規制・指導の下で、銀行が顧客に繰り返し情報提供の必要性を訴えたことが奏功し、現時点では、かなりその問題の程度が小さくなっている」。 ▪ 印は、国民デジタルIDが普及しており基本的には課題としてみなされていない一方、貧困地域に住みデジタルメディアにアクセスできない顧客から銀行が最新情報を入手することが困難とのこと。 <p>— 加えて、これらの国々では、対顧客連絡に手紙ではなくアプリを使っている（下掲2参照）、情報更新に非協力的な顧客に取引の制限が法律によって求められていることが当然視されている（下掲3参照）等が挙げられる。</p>
2	既存顧客への連絡手段（手紙・電子メール・Webアプリその他）	✓ 最新顧客情報提供の依頼は郵送により行われることが多い。	<ul style="list-style-type: none"> ✓ 顧客とのコミュニケーション（口座開設、その後の更新双方のKYC含む）の大部分は銀行のバンキングアプリで行われる（米、英、瑞、豪、星、印）。例示として、星では80%超の顧客はバンキングアプリを利用している。 ✓ これらの国では、銀行が顧客の最新情報を提供する必要があるタイミングで、顧客がバンキングアプリにログインした後の画面にプロンプトが表示され、当該顧客が自らの最新情報を提供しないと、自分の口座にアクセスすることが出来ない仕組みとする銀行が殆どである。 ✓ バンキングアプリのアラートに加えて銀行は、①電子メール、②サービスセンターの担当者からの電話、および③郵送による依頼など、多面的なアプローチで既存顧客に連絡を取っている。複数のアプローチを受けた顧客は、顧客自身にとって最も都合のよい

#	観点	日本の状況	海外（意見交換先）の状況
			<p>方法で回答できる。⁴</p> <p>銀行は可能な限り、顧客との関係の中で生じる自然なコミュニケーションから最新情報を入手する(例えば、自動車ローンの申し込みや、クレジットカードの与信限度額を引き上げるためのマーケティング・コミュニケーション)。そうすれば、顧客は、単に個人情報の提供を強要されていると感じない。</p> <p>✓ 香のほとんどの銀行は、HKMA の規制を踏まえつつ、高リスクの顧客に絞って情報取得をすることとしており（SDD 対象顧客の範囲が日本比広い⁵、Appendix 2 を参照）、最新情報を取得するために、その数的には日本比限られた顧客に対して電話で連絡する。電話が郵送による情報の要求と比較して顧客から最も高い応答率を引き出すことを認識し、その結果、郵便は通常使用されない。</p>
3	<p>情報更新について非協力的な顧客に対する取引制限の中断・停止措置の使われ方、顧客の受け止め方、根拠となる法令・規制当局の指導（指針）・規制状況、銀行と顧客の間の約款の中の条文の存在など（取引制限がかけやすい環境・仕組みの存</p>	<p>✓ AML/CFT ガイドラインでは、CDD に対して次の記載がある。「必要とされる情報の提供を利用者から受けられないなど、自ら定める適切な顧客管理を実施できないと判断した顧客・取引等については、取引の謝絶を行うことを含め、リスク遮断を図ることを検討すること。その際、マネロン・テロ資金供与対策の名目で合理的な理由なく謝絶等を行わないこと⁶</p> <p>✓ 一方、上記の「取引の遮断」措置は、国民に理解が浸透していないため、実際には広</p>	<p>✓ 全ての対象国において、顧客が最新情報を提供しない場合、当該国の法律、規制当局の姿勢、またはその両方に基づき、顧客の口座利用を制限する、または口座を閉鎖する権限を銀行が持つ。当該措置の適用方法や程度は国によって異なる（Appendix 1 を参照）。</p> <p>✓ 一部の国では、CDD を完了できない場合、銀行は最終的に顧客の口座を閉鎖するように規制上に明確に義務付けられている（独、瑞、星、印）。</p> <ul style="list-style-type: none"> ▪ 星：社会に規制遵守第一の傾向が強い中、銀行は顧客口座閉鎖に非常に厳しいアプローチを取っている。 ▪ 独、瑞、印の銀行は、消費者保護への悪影響を避けるため、段階的なアプローチをとっている。例えば、最初に日常生活に必要な取引(電気代など)以外の取引を制限し、次に、すべての取引をブロックし、顧客に何度も連絡を試みた後、

⁴ 例えば、郵送での情報更新の場合、回答率は 5%であり、オンラインなどマルチチャンネルを活用した場合は 90%に回答率が向上する事例は KPMG UK から紹介された。

⁵ 香では、リスクベース・アプローチにおいて個々の銀行が低リスクと判断した先を SDD 対象とすることが可能。

顧客リスク評価において低リスクと判断可能な要素の例（ディスクロージャー要件が適用される上場企業、生命保険の年間保険料が HK\$8000 未満の契約等）。

⁶ 令和 3 年 2 月 19 日 金融庁 マネー・ローンダリング及びテロ資金供与対策に関するガイドライン、II II-2 (ii) ⑪

#	観点	日本の状況	海外（意見交換先）の状況
	否)	く適用されていない。	<p>口座を閉鎖する。</p> <p>✓ CDD が完了しない場合に口座を閉鎖するかどうかを銀行自身がリスクベース・アプローチをとった上で判断することが規制上に規定されている国もある（英、豪、香）。</p> <ul style="list-style-type: none"> ▪ 英：公共情報から不足している顧客情報を特定しようとした上で、上記と似たような段階的なアプローチをとり、慎重に ML のリスクを計り、銀行の法務部門と相談した後、最終的に口座を閉鎖するかどうかを判断する。 ▪ 香：いわゆる「Three Strike Rule」を適用する。顧客への何度も連絡を試みたが成功しない場合または顧客は最新情報の提供を否定する場合、銀行は顧客の AML/CFT リスクに応じて、または STR の対象となっているかどうかに応じて、コンプライアンスレビューを実施する。コンプライアンスレビューの結果によって、銀行は STR を申請するかどうか、顧客のリスク評価を再評価するかどうかを判断する。2 年以内に STR が 3 件申請されると、銀行は当該顧客の口座を閉鎖する。 <p>✓ 顧客の口座利用制限等が、約款に規定されている国が多い（英、独、瑞、豪、香、星）。</p> <ul style="list-style-type: none"> ▪ 口座契約約款では、銀行から要求された最新かつ完全な情報を提供する顧客の要件と、この情報が提供されない場合に顧客口座を閉鎖する銀行の義務が明確に規定されている（独、瑞、星）。香の銀行の口座契約約款では、口座を閉鎖する銀行の権限が規定されている。 ▪ 英、豪の口座契約約款では、銀行が取引制限・口座閉鎖する権限を規定している。銀行から要求された最新の完全な情報を提供することを顧客が拒否することもその理由に含まれると解釈される。
4	デジタル ID の普及に伴う顧客の最新情報の取得しやすさ	<p>✓ マイナンバーカードについては、「本人同意に基づく基本 4 情報等の提供」を認めるべく、法改正が進んでおり、この新制度を活用すれば、結婚による変更後の苗字や、転居後の新住所を（本人同意に基づき）J-LIS から得られるようになっている。しかしな</p>	<p>✓ デジタル ID が普及している国において、口座開設時および継続的に顧客情報を提供するためのデジタル ID の使用は、通常のプラクティスになっているため、口座開設プロセスと継続的顧客管理の両方が容易になっている（瑞、星、印）。</p> <p>✓ 瑞：民間レベルで独自 ID 基盤を構築することが認められており、民間銀行界主導で BankID と呼ばれるデジタル ID を作り、それを政府のデジタル ID（アンカー ID）と連携させている。</p>

#	観点	日本の状況	海外（意見交換先）の状況
		<p>がら、顧客の本人確認のために「公的個人認証の方法」（犯収法施行規則 6 条 1 項 1 号ワ）を使っている銀行は現時点では少ない模様。</p>	<p>✓ 星：デジタル ID(MyInfo)を利用する継続的顧客管理プロセスは以下のとおり。</p> <ul style="list-style-type: none"> ▪ トリガーイベントで銀行が最新顧客情報を取得する必要がある場合、顧客が銀行アプリにログインすると、画面が表示され、銀行が MyInfo を銀行にアクセス付与することを顧客に要求する。 ▪ 銀行は、顧客から同意を得た後、顧客から提供された MyInfo 情報を登録されている顧客情報と比較する。 ▪ 顧客は政府に対して MyInfo 情報を常に最新の状態に保つよう要求されている(但し、顧客が MyInfo を適時に更新しない場合もある)。 <p>✓ 印：デジタル ID(Aadhaar)が銀行口座の殆どと紐づけ済みであり、それを利用した継続的顧客管理が以下のプロセスで行われている。</p> <ul style="list-style-type: none"> ▪ 銀行は、情報更新が必要な顧客に、その旨をアプリで通知。 ▪ 顧客は、アプリで銀行に「更新情報」を返信。 ▪ 銀行は、再度の顧客同意を得て、政府認証機関から本人が登録済の最新情報（名前、住所、生年月日等）を入手。 ▪ 銀行は、その情報と顧客からアプリで受信した情報の一致を確認し、継続的顧客管理を完了。 ▪ 銀行は、顧客にアプリでその旨を通知。 <p>✓ 英、独、香の3カ国では、デジタル ID を使った継続的顧客管理の実務はみられていない（英は、デジタル ID 関連の検討の段階。独は、デジタル ID 実用化は行われているものの、国民の多くが当該機能を利用可能な状態にしていない。香は、昨年 12 月に任意加入の制度を導入済だが普及率は低い）。</p>
5	消費者にとっての銀行口座の数の多寡と銀行に対する情報提供の姿勢への影響	<p>✓ 日本の成人は、殆ど使わない（休眠口座に近い）ものも含めて、4 つ、5 つ以上の口座を持ち、自分にとって優先順位が低い口座について最新情報を提供することに消極的な場合がある。</p>	<p>✓ 調査対象国の多くでは、顧客が複数の口座を保有していても、自らの最新情報の提供に消極的な場合は少ないと考えている。その理由は以下の通り。</p> <ol style="list-style-type: none"> ① 【法規制環境等から対銀行情報提供は当然と捉えられていること】多くの国では、法律上保有した銀行口座について KYC は定期的に求められ、それに応じなければ取引制限、凍結、契約解除になるということを国民が理解している（上掲 3 参照）。 ② 【口座維持手数料から「無駄な」口座を持たない傾向があること】金融機関も経

#	観点	日本の状況	海外（意見交換先）の状況
			<p>済合理性等の観点から、採算の低い（残高が少ない）口座については一定の手数料を課している。</p> <p>上記の下、国民は利用しなくなった口座については放置せずに解約するため、結果的に実際に利用する（本来の目的が明確である）口座のみが存在する。</p> <ul style="list-style-type: none"> ✓ 英：多くの顧客は、従来型の手銀行口座ひとつとチャレンジャーバンクの口座ひとつ、の計2つ程度としていて、4つも5つも口座をもつケースは比較的少ない。 ✓ 独：ECBのマイナス金利の政策の下で、預金者の銀行口座保有には手数料（事実上「マイナス金利の適用」が課される。このため顧客は、真に必要な以上の数の銀行口座を設けるインセンティブは無い。 ✓ 星：預金保険制度は1つの銀行口座当たり一定額までしかカバーしないため、資産を多く持つ顧客はリスクを分散するために多数の銀行口座を持つことが珍しくなく、それら複数の口座については、それぞれに「相応の預金残高」を持つこととなる。ただし、その地の法規制の厳しさの影響もあって、預金者は銀行に対する情報提供に積極的に応じている。 ✓ 瑞：大手銀行が同じようなサービス・価格設定を提供している状況の中で、顧客は通常1つの銀行口座しか持たないことが一般的。
6	口座維持手数料の存否	<ul style="list-style-type: none"> ✓ 銀行口座は日本国民について必要不可欠な生活インフラであるとの理解が長年定着しているため、維持手数料の徴求は国民の理解が得られにくい状況の中、今までは銀行が銀行口座の維持費を請求する事例は多くなかった。最近、大手行は新規に開設口座に対して維持手数料を適用し始めており、地域金融機関でも「未利用口座管理手数料」の導入が広がっている。今年9～10月には全99行中の過半数（55行）が導入済となる見込み（9月3日ニッキンによる）。 	<ul style="list-style-type: none"> ✓ 口座維持手数料の有無とその適用範囲は国によって異なる。口座維持手数料を課すことによって不要な口座は解約するインセンティブの一つとなる。 ✓ 銀行が、一定の残高を下回る口座について、毎月の口座維持手数料を請求する国が4か国（米、豪、星、印）。 ✓ 口座維持手数料が課されない国が2か国（英、瑞）。 ✓ 独の銀行はすべての口座に対して年間口座維持手数料を請求する。また、顧客の口座残高が一定の残高を超える場合、ECBのマイナス金利のため、顧客は銀行にお金を支払わなければならない。 ✓ 香の銀行は、ネットバンキングとの競争力を維持するため、口座維持手数料を廃止しているという動向がある。

#	観点	日本の状況	海外（意見交換先）の状況
7	銀行顧客の最新情報の記録について、顧客自身が銀行の website で upload するなどの方法が広く使われ、銀行にとっての手間の削減につながっているか	<ul style="list-style-type: none"> ✓ ほとんどの顧客最新情報の取得が郵送並びに回答の入力・検証に手作業が生じ、多額のコストがかかる。 	<ul style="list-style-type: none"> ✓ オンラインバンキングアプリとデジタル ID の 2 つの普及が、顧客情報データ収集・検証の両面で銀行にとっての負担を減らしている（瑞、星、印）。 ✓ 顧客が website で情報をアップロードするのが標準的な方法である一方、銀行は入手した情報の確認と検証を必要としており、これは依然として目視確認が残る（米、独、豪）。 ✓ 英の銀行では個人情報（公開情報あるいは個人が同意した情報）をまとめて提供する FinTech プロバイダの利用を増やしている。 ✓ 香の大手銀行は最近、オンラインバンキングアプリ経由で顧客情報をアップロードするオプションを顧客に提供し始めているが、まだ広く利用されていない。
8	取引データから KYC プロセスに必要かつ有益な情報を抽出する仕組み（システム）を構築しているか（例えば給与所得者か、年金生活者かなど）	<ul style="list-style-type: none"> ✓ 日本の多くの銀行では、KYC と取引モニタリングシステムを結び付けて、各顧客のリスク検知に使う仕組みが充分でない（相互審査報告書パラグラフ 366 を参照）。 	<ul style="list-style-type: none"> ✓ 銀行は、既存の顧客情報から予想される想定取引パターンと、実際の顧客の取引が整合的かどうかを確認する。不整合がある場合、銀行は調査を実施し、顧客のリスクプロファイルを見直す必要性や、顧客情報の追加的な入手の必要性または STR を提出する必要があるかどうかを判断する（米、英、豪、香）。 <ul style="list-style-type: none"> ▪ 星の銀行では、上記のプロセスにあたりデータアナリティクスツールの利用が多い。米、英、豪の銀行においてまだほとんど手作業のプロセスである。 ✓ 瑞、独、香は、理想的には、取引モニタリングシステムのシナリオは、顧客のプロファイルに合わせて調整されるが、実際には、銀行が、「ベンダーから提供された初期設定」を変えず、いわば「レディメイドの TMS」で対応しているケースが多い。 ✓ 米の銀行は CIF（顧客情報ファイル）の不足を補うため、銀行が持つその他の既知のデータを使用する。例えば、継続的な資金源についての情報が欠けている場合、銀行は顧客の取引記録から顧客の職業を特定し、それが顧客の継続的な資金源であると推定する等。
9	既存顧客についての最新の情報の取得について、銀行が難しさを抱えている場合の個別銀行や銀行業界としての対処策	<ul style="list-style-type: none"> ✓ 全銀協では、最新情報の提供に協力することの重要性について、顧客の意識向上を図るため、テレビ CM や店頭動画配信など 	<ul style="list-style-type: none"> ✓ 既存顧客についての最新の情報の取得について、難しさを抱えていないため、業界レベルで特段の対応は行っていない国が多い（米、英、瑞、独、豪、星、印）。 ✓ 香の金融業界では、過去 10 年にわたり、HKMA が AML/CFT のリスク及び AML/CFT 規制遵守の重要性に関する顧客意識の向上のため CM やその他マーケティング活動に積極的に取り組んできており（Appendix 3 を参照）、これには顧客による最新情報の提供の必要性が含まれる。これらの措置は、AML/CFT の重要

#	観点	日本の状況	海外（意見交換先）の状況
		のマーケティング活動を実施している ⁷ 。	<p>性を認識し、顧客が銀行に情報を提供することを受け入れる文化をもたらした。</p> <p>✓ 星の銀行は、顧客情報の更新を適時に銀行に提供することを拒否することを含め、銀行との契約条件に違反した顧客の口座を凍結または解約することを顧客向けのウェブサイトで明示している。</p> <p>✓ いずれの国もポジティブインセンティブは見られない。その理由として、多くの国では①そもそも難しさを抱えていない、②法律上、実務上顧客が最新情報を提供しなければ取引制限、残高維持しなければ手数料というネガティブインセンティブが既に組み込まれている。</p>

⁷ <https://www.zenginkyo.or.jp/money-laundering/#c43776>

4. 今後についての示唆・今後の検討ポイント

1.3.仮説の再掲	3.調査結果を踏まえた評価	示唆・検討ポイント
<p>仮説 1 海外では、顧客との間でのやりとりが電子メールや Web アプリなどが普通。従って、手紙が届かないことによる問題が無い。また電子メールや Web アプリで連絡が取れない顧客との間では、取引の一時停止・中断が広く行われ、また顧客からもそれが受け入れられている。</p>	<p>「海外では取引にオンラインバンキングアプリが使われるケースが多く、手紙ではなくバンキングアプリを使った対顧客連絡が可能」との声が多く、仮説 1を支持している。</p>	<p>顧客に対するデジタルチャネル開拓は、各行それぞれの営業戦略に基づき適宜推進している。</p> <p>DM 郵送に基づく継続的顧客管理の実効性やコスト面の課題は各行にとって解決が難しいところであることを踏まえると、AML/CFT 目的達成の観点からもデジタルチャネル対応を一層推進することが望ましい。⁸</p> <p>各行のデジタルチャネル対応を推進するため、デジタルチャネル推進の事例共有等が考えられる。</p> <p>(参考) なお、AML/CFT 態勢高度化研究会関係者から「電子メールアドレスの対銀行届出を必須化できるか」「電子メールによる銀行からの連絡にどういった効力を持たせることができるか」についても要検討との指摘があった。</p>
<p>仮説 2 海外の（一部の）国では、デジタル ID が普及しており、一定期間の経過などで継続的顧客管理が必要となった顧客に対しては、デジタル ID の提示を求め、それと</p>	<p>デジタル ID が普及している星、印、瑞では、取引開始時はもちろん継続的顧客管理の際にもデジタル ID が有効との見方が示され、仮説 2を支持している。</p>	<p>我が国におけるデジタル ID および関連する制度として、マイナンバーカードの公的個人認証、およびこれを利用することを前提とした犯収法施行規則 6 条 1 項 1 号ワ等が挙げられる。マイナンバーカードの普及率が今後一層拡大することが見込まれ、政府も様々な施策に取り組んでいる⁹。</p> <p>(参考) 2021 年 9 月 1 日時点の普及率 37.6%（交付枚数／人口）。政府は 2022 年度末にほぼ全ての国民が取得することを目指している。</p> <p>一方で、本人確認情報の更新を含む CDD の対応高度化においては、このような国の制度・施</p>

⁸ 同時に、なりすまし等の非対面チャネル固有のリスクについては適切に対応することが前提となる。

⁹ マイナンバーカード機能のスマートフォン搭載、公的個人認証における基本 4 情報の提供等

1.3.仮説の再掲	3.調査結果を踏まえた評価	示唆・検討ポイント
<p>もに当該顧客の最新時点での住所等の情報取得が可能となっている。</p>		<p>策と十分関連付けて検討するに至っていない銀行が少なくない状況と言える。¹⁰</p> <p>各行が、上記のような検討を推進するために、官民での協力体制を今後検討していくことが考えられる。例えば、当局からの制度・施策に関する必要な情報の共有を頂き、公的個人認証制度の利用を検討する際の共通の課題に関する検討、必要に応じた当局への働きかけが考えられる。</p>
<p>仮説 3 海外では、消費者は日本のように多くの銀行口座を保有することがない（もしくは銀行口座を保有できない Un-banked 層が相応に多い）。日本では、口座維持手数料徴収が一般的ではないこともあり、あまり使用されないままに、多くの口座を保有し続けるケースが多い。このような口座を対象に継続的顧客管理が行われる場合、利用者は煩わしいと感じ、回答のインセンティブは低くなる。</p>	<p>海外では、銀行顧客が口座維持に必要な情報提供を怠ることが原則として認められないこと（下記仮説 4）、口座維持手数料が存在することから、継続して保有する意義に乏しい口座を保有し続けることはまずないとの声が多かった。これにより左記仮説 3は支持される。</p>	<p>各行が継続的顧客管理を十分にすすめていくことが難しい理由として、①デジタルチャネルが十分確立されてないこと②DM 郵送に頼らざるを得ないことがあるが、これらに加えて、左記のようにあまり使用されないままに、多くの口座を保有するケースが多いことが要因として考えられる。これらの口座が多数存在したまま、郵送を中心とした継続的顧客管理を継続するのは実効性・効率性双方の観点からも課題がある。</p> <p>これらの課題については、DM 郵送に大きく依拠することなく、継続的顧客管理をすすめるため、各行の事例紹介・ノウハウ整理・共有を積極的に行っていくことが望ましいとの意見もあるところである。</p> <p>さらには、各行の取組上の課題については、当局からの国民への周知が期待される。</p>
<p>仮説 4 海外では、口座を持</p>	<p>海外では、</p>	<p>FATF 第 4 次対日相互審査では、「顧客が金融機関の CDD 義務履行上の求めに応じなかつ</p>

¹⁰ なお、邦銀の一部から、マイナンバーカード等から得られる基本情報以外の情報取得方法は、別途検討する必要があるとの指摘があった。

1.3.仮説の再掲	3.調査結果を踏まえた評価	示唆・検討ポイント
<p>つ銀行に自らの最新情報を更新しておかないと口座取引の停止を受けることがむしろ当たり前と考えられており、そのため、顧客が銀行に自らの最新情報を提供することに抵抗や遅滞が生じにくい。</p>	<p>①法規制において、AML/CFT 目的で情報提供に消極的な顧客との取引に制限的に対応せよとする姿勢が明確、</p> <p>②そうしたもて、銀行は取引制限・口座閉鎖等を実施、</p> <p>③顧客側でも、自分の情報を提供しないと銀行から取引制約や口座廃止の措置を受けるのは当たり前と理解されている、</p> <p>といった状況であり、左記仮説 4は支持される。</p>	<p>た場合、契約関係・取引を継続するかどうかの対応が金融機関によって分かれている。加えて金融機関はこのような局面で取引関係を謝絶することは求められていない。¹¹」と指摘されている。</p> <p>我が国の CDD は金融庁ガイドライン（相互審査上法的拘束力をもつ）にあるが、他方、海外においては、法令レベルで同趣旨が規定されていることが多く（Appendix 1）、この違いが、国民への理解の深度に影響を及ぼす要因と考えられる。仮説 6 のとおり国民の理解が十分得られていない現状、ならびに取引制限を規定するものが法令でなく、必要に応じてリスク低減措置をとるべきといったガイドライン（含む FAQ）と、各行が預金者との間で締結している預金約款のみであり、法的裏付けが海外での事例と比較しても弱い。そのような中で、金融機関は引き続き、顧客から必要な情報を得ること、および得られなかった場合、適切な措置をとることについて対応に苦慮する局面が今後も解消されないことが懸念される。</p> <p>我が国では、CDD の国民の理解を推進していくため、官民が一体となって国民への情報発信や規制上のより一層の明確化の働きかけ等を行っていく必要がある。</p>
<p>仮説 5 海外では、SDD の範囲（FAQ で示されたリスクに応じた簡素な顧客管理）が日本よりも広く認められており、定期的な CDD に応じなければいけない顧客層が相対</p>	<p>海外では「当局は既存顧客の情報取得の可否をリスクベースで判断すべきとしている」とする国が多かった。これにより仮説 5は支持される。</p>	<p>仮説 3 のとおり、我が国では海外に比べて、顧客が継続して保有する意義に乏しいものを含め複数口座を保有していることで、CDD を実施することが必要な口座の比率が海外よりも高いことが想定される。他方、海外においては、特にマスリテールのリスクの低い顧客層については、一律に何年に一回という CDD ではなく、イベントベースでの CDD を実施しているとの回答が多かった。こうしたことを踏まえると、SDD の範囲や対応方法について各行の事例照会、ノウハウ整理・共有等を進めつつ、そういった情報も参考に、各行において自らリスクベース判断し対応を進めていく必要</p>

¹¹ "FIs have some flexibility to continue to engage into the relationship or conduct the transaction, if a customer does not respond to the request for verification (CDD measures) at the time of transaction. In addition, FIs are not required to terminate the business relationship under this scenario." FATF, Mutual Evaluation Report Japan, P283.

1.3.仮説の再掲	3.調査結果を踏まえた評価	示唆・検討ポイント
的に少ない。		がある。 海外の事例にもある、イベントベースでの対応の仕方については、取引モニタリングとCDDの関係の深化を求めるFATF対日審査結果 ¹² も踏まえて検討することが必要である。
仮説6 国民文化（消費者の考え方、姿勢）の違いということが考えられる。日本では、自らの苗字や住所など基本的な情報についても「なるべく他者」に伝えない傾向が強い。	米・瑞・香で「自分たちの国でも昔と今は違う」として、国民の理解が進んだ背景として、国民生活に直結するテロ、マネロンスキャンダルおよびこれを契機とした当局の姿勢の変化 ¹³ をあげた。この観点から仮説6は支持される。	海外事例では、国民の生命の危機、日常生活に潜んでいたシステミックな不法行為の暴露 ¹⁴ 、あるいは当該行為にからんだ自殺等 ¹⁵ の衝撃的な事件等が、社会全般に甚大かつ深刻なインパクトを与えたことによって、国民の意識が大きく変わり得ることを示している。加えてこのような国民の危機意識に基づき、当局が適切に法制度を整備し、金融機関やこれを利用する国民への説明責任を果たした結果、国民に一定の納得性が浸透しつつ、金融実務が変わってきたということもできる。 この点、FATF第4次対日相互審査結果にもあるとおり、日本は「全体として実際のテロ資金供与リスクは相対的に低い」とされていることから、国民のAML/CFTへの理解が左記のような各国と異なり、これを変えることは、容易ではないことも推察される。

¹² パラグラフ 366 “Regarding ongoing CDD, FIs are starting to build up systems to maintain accurate and relevant customer information, according to the requirements of the JFSA Guidelines. However, the ongoing CDD measures seem limited to updating information collected on the customer and to screening lists. Conducting ongoing CDD following this approach does not allow FIs to make connections between the customer’s profile and his/her operations, and to detect potential deviation from the expected customer’s behaviour. Supervisory interpretation or guidance would be needed to address this weakness and improve the effectiveness of the implementation of ongoing CDD requirements (see IO 3). As reported in the 2019 JFSA AML/CFT report, some FIs are currently considering the utilization, designing or implementing IT systems for CDD and transaction monitoring and transaction filtering/screening. However, these IT systems are mostly not in place yet, while their effectiveness, where already in place, is still limited (mega banks and some regional banks, which have already implemented transaction monitoring systems with thresholds adjusted to customer risk profiles, are still facing many challenges, such as a very high ratio of false positives).”

¹³ ＊：9.11 同時多発テロ以降の PATRIOT ACT 制定、瑞：北欧の大規模マネロンスキャンダル後の当局のAML/CFT 対応厳格化等

¹⁴ シティバンクのメキシコ支社の麻薬関連取引への関与が社会の不安定化につながると意識された例。

¹⁵ ダンスケ銀行エストニア支社長の自殺の例。

1.3.仮説の再掲	3.調査結果を踏まえた評価	示唆・検討ポイント
		ML/TF の社会に及ぼす害、これを防止・検知することの社会的な要請、金融機関に求められている義務とそれに国民が応じる意義については、国際社会における日本の立ち位置も含め、今まで以上に官民をあげて積極的かつ継続的に情報発信していく必要がある。
<p>仮説 7 海外では、既存顧客が最新の顧客情報を銀行に提供しやすくする、ないしはせざるを得ないようなインセンティブを銀行が与えている。</p>	<p>海外には「プラスのインセンティブがある」とした国は無かった。他方「マイナスのインセンティブはある」として取引制約や口座廃止の措置をあげる国々は多かった（この観点から仮説 7 は支持される）。</p>	<p>プラスのインセンティブについては、継続的顧客管理としてのみではなく、仮説 1 で記載したようなデジタルチャネル誘導の一環として取り組むことも考えられる。</p> <p>ただし、マイナスインセンティブに関しては、海外事例における法制化や規制当局の厳格な姿勢、社会的な合意形成等を踏まえ、我が国における対応を総合的に検討していく必要がある。</p>

海外では、顧客リスク 3 段階¹⁶ごとの継続的顧客管理の更新頻度について、当局の期間指定が厳格になった例¹⁷もあれば、長期化した例¹⁸もある。「銀行のリスク対応状況が不適切」と判断された場合当局対応が厳格化され、「適切」と判断された場合緩和されていることが示唆されている。

（Appendix 1）情報更新について非協力的な顧客に対する対象国該当規制（抜粋）

国・規制名	規制条項（抜粋）
<p>英国 The Money Laundering, Terrorist</p>	<p>Requirement to cease transactions etc. 31.—(1) <u>Where, in relation to any customer, a relevant person is unable to apply customer due</u></p>

¹⁶ Low-Middle-High

¹⁷ 豪：以前は当局規制が厳しく無かったが、最近、1-3-5 年の指導が明確化。

¹⁸ 独：ガイドライン更新前の多くの例 1-3-5 年→更新後のガイドラインに 2-7-15 年と明記された。

国・規制名	規制条項 (抜粋)
Financing and Transfer of Funds (Information on the Payer) Regulations 2017 ¹⁹	<p>diligence measures as required by regulation 28, that person—</p> <p>(a) must not carry out any transaction through a bank account with the customer or on behalf of the customer;</p> <p>(b) must not establish a business relationship or carry out a transaction with the customer otherwise than through a bank account;</p> <p>(c) must terminate any existing business relationship with the customer;</p> <p>(d) must consider whether the relevant person is required to make a disclosure (or to make further disclosure) by—</p> <p>(i) Part 3 of the Terrorism Act 2000(11); or</p> <p>(ii) Part 7 of the Proceeds of Crime Act 2002(12).</p>
<p>ドイツ</p> <p>Interpretation and Application Guidance in relation to the German Money Laundering Act (Geldwäschegesetz – GwG)²⁰</p>	<p>5.8.1 Principles</p> <p>The termination obligation in case of the actual or legal impossibility of fulfilment of one of the due diligence obligations indicated in section 10 (1) nos. 1 to 4 of the GwG applies without any restrictions. Pursuant to section 14 (3) of the GwG and section 15 (9) of the GwG, this also applies where the relevant simplified or enhanced due diligence obligations cannot be fulfilled. In case of existing business relationships, if the above-mentioned due diligence obligations cannot be fulfilled notice of regular or extraordinary termination must be provided (where applicable, while referring to a violation of the relevant persons' obligation to cooperate as well as a possible termination obligation stipulated by law), irrespective of the (in-) applicability of other statutory or contractual provisions or else termination must be otherwise effected.</p>
<p>スウェーデン</p> <p>Act (2017: 630) on measures against money laundering and terrorist financing²¹</p>	<p>Chapter 3 Customer knowledge</p> <p>Prohibition of business relationships and transactions</p> <p>Insufficient customer knowledge</p> <p>§ 1 An operator may not establish or maintain a business relationship or perform a single</p>

¹⁹ The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, Part 3 Customer Due Diligence, Chapter 1 Customer due diligence: general, 31. Requirement to cease transactions, etc. <https://www.legislation.gov.uk/ukSI/2017/692>

²⁰ Interpretation and Application Guidance in relation to the German Money Laundering Act (Geldwäschegesetz – GwG), Customer-related due diligence obligations, 5.8 Non-establishment/termination of business relationships and non-implementation of transactions, section 10 (9) of the GwG, 5.8.1 Principles. https://www.bafin.de/SharedDocs/Downloads/EN/Auslegungsentscheidung/dl_ae_auas_qw2020_en.pdf?__blob=publicationFile&v=1

²¹ Act (2017: 630) on measures against money laundering and terrorist financing, Chapter 3 Customer Knowledge, Prohibition of business relationships and transactions, Insufficient customer knowledge.

国・規制名	規制条項 (抜粋)
	<p>transaction, if the operator does not have sufficient knowledge of the customer to be able to</p> <ol style="list-style-type: none"> 1. <u>manage the risk of money laundering or terrorist financing that may be associated with the customer relationship, and</u> 2. <u>monitor and assess the customer's activities and transactions according to Ch. 1 and 2 §§.</u>
<p>オーストラリア Anti-Money Laundering and Counter-Terrorism Financing Rules 2007 (No. 1)²²</p>	<p>CHAPTER 15 Ongoing customer due diligence 15.10 The enhanced customer due diligence program must include appropriate risk-based systems and controls so that, in cases where one or more of the circumstances in paragraph 15.9 arises, a reporting entity must undertake measures appropriate to those circumstances, including a range of the measures in subparagraphs 15.10(1) to (7):</p> <ol style="list-style-type: none"> (5) undertake more detailed analysis and monitoring of the customer's transactions – both past and future, including, but not limited to: <ol style="list-style-type: none"> (a) the purpose, reasons for, or nature of specific transactions; or (b) the expected nature and level of transaction behavior, including future transactions; (6) seek senior management approval for: <ol style="list-style-type: none"> (a) <u>continuing a business relationship with a customer; and</u> (b) <u>whether a designated service should continue to be provided to the customer;</u> (7) <u>consider whether a transaction or particular transactions should be processed.</u>
<p>香港 Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (For Authorized Institutions)²³</p>	<p>4.13 Failure to satisfactorily complete CDD s.3(1) & (4), Sch. 2 (4.13.1) <u>Where the AI is unable to comply with relevant CDD requirements set out in this Chapter and the ongoing due diligence requirements set out in Chapter 5, it should not establish a business relationship or carry out any occasional transaction with that customer, or should terminate business relationship as soon as reasonably practicable (where applicable), and where there is relevant knowledge or suspicion, should make an STR to the JFIU.</u></p>
<p>シンガポール</p>	<p>Where Measures are Not Completed</p>

https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/lag-2017630-om-atgarder-mot-penningtvatt-och_sfs-2017-630 (Google translation from Swedish).

²² Anti-Money Laundering and Counter-Terrorism Financing Rules 2007 (No. 1), CHAPTER 15 Ongoing customer due diligence, 15.10. [Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 \(No. 1\) \(legislation.gov.au\)](https://www.legislation.gov.au/australian-legal-instruments/2007/1/1)

²³ Guideline on Anti-Money Laundering and Counter-Financing of Terrorism (For Authorized Institutions), 4.13 Failure to satisfactorily complete CDD, s.3(1) & (4), Sch. 2, 4.13.1. <https://www.hkma.gov.hk/media/eng/doc/key-information/guidelines-and-circular/guideline/g33.pdf>

国・規制名	規制条項 (抜粋)
MAS Notice 626 Prevention on Money Laundering and Countering The Financing of Terrorism- Banks ²⁴	<p>6.35 <u>Where the bank is unable to complete the measures as required by paragraphs 6, 7 and 8, it shall not commence or continue business relations with any customer, or undertake any transaction for any customer.</u> The bank shall consider if the circumstances are suspicious so as to warrant the filing of an STR.</p> <p>6.36 For the purposes of paragraph 6.35, completion of the measures means the situation where the bank has obtained, screened and verified (including by delayed verification as allowed under paragraphs 6.33 and 6.34) all necessary CDD information under paragraphs 6, 7 and 8, and where the bank has received satisfactory responses to all inquiries in relation to such necessary CDD information.</p> <p>Existing Customers</p> <p>6.38 A bank shall perform the measures as required by paragraphs 6, 7 and 8 in relation to its existing customers, based on its own assessment of materiality and risk, taking into account any previous measures applied, the time when the measures were last applied to such existing customers and the adequacy of data, documents or information obtained.</p>
イント Master Direction – Know Your Customer (KYC) Direction, 2016 (Updated as of May 10, 2021) ²⁵	<p>Chapter VI Customer Due Diligence (CDD) Procedure Part I - Customer Due Diligence (CDD) Procedure in case of Individuals</p> <p><u>If the CDD procedure as mentioned above is not completed within a year, in respect of deposit accounts, the same shall be closed immediately.</u> In respect of borrowal accounts no further debits shall be allowed.</p> <p>Part V - On-going Due Diligence</p> <p><u>Provided further that if a customer having an existing account-based relationship with a RE gives in writing to the RE that he does not want to submit his Permanent Account Number or equivalent e-document thereof or Form No.60, RE shall close the account and all obligations due in relation to the account shall be appropriately settled after establishing the identity of the customer by obtaining the identification documents as applicable to the customer.</u></p>

²⁴ MAS Notice 626, Prevention on Money Laundering and Countering The Financing of Terrorism- Banks, Where Measures are Not Completed, 6.35, 6.36, 6.38.
<https://www.mas.gov.sg/-/media/MAS-Media-Library/regulation/notices/AML/D/notice-626/MAS-Notice-626---Banks.pdf>

²⁵ Reserve Bank of India, Master Direction – Know Your Customer (KYC) Direction, 2016 (Updated as of May 10, 2021), Chapter VI, Part I Customer Due Diligence (CDD) Procedure in case of individuals and Part V – On-going Due Diligence. https://m.rbi.org.in/Scripts/BS_ViewMasDirections.aspx?id=11566

(Appendix 2) 対象国の一部における SDD 関連規制の抜粋

英国

規制名 : The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017²⁶

Chapter 3. Simplified customer due diligence	
37(1)	A relevant person may apply simplified customer due diligence measures in relation to a particular business relationship or transaction if it determines that the business relationship or transaction presents a low degree of risk of money laundering and terrorist financing, having taken into account— (a) the risk assessment it carried out under regulation 18(1); (b) relevant information made available to it under regulations 17(9) and 47; and (c) the risk factors referred to in paragraph (3).
37(2)	Where a relevant person applies simplified customer due diligence measures, it must— (a) continue to comply with the requirements in regulation 28, but it may adjust the extent, timing or type of the measures it undertakes under that regulation to reflect its determination under paragraph (1); and (b) carry out sufficient monitoring of any business relationships or transactions which are subject to those measures to enable it to detect any unusual or suspicious transactions.
37(3)(a)	When assessing whether there is a low degree of risk of money laundering and terrorist financing in a particular situation, and the extent to which it is appropriate to apply simplified customer due diligence measures in that situation, the relevant person must take account of risk factors including, among other things— (a) customer risk factors, including whether the customer— (i) is a public administration, or a publicly owned enterprise; (ii) is an individual resident in a geographical area of lower risk (see sub-paragraph (c)); (iii) is a credit institution or a financial institution which is— (aa) subject to the requirements in national legislation implementing the fourth money laundering directive as an obliged entity (within the meaning of that directive), and (bb) supervised for compliance with those requirements in accordance with section 2 of Chapter VI of the fourth money

²⁶ https://www.legislation.gov.uk/uksi/2017/692/pdfs/uksi_20170692_en.pdf

	laundrying directive; (iv) is a company whose securities are listed on a regulated market, and the location of the regulated market;
37(3)(b)	(b) product, service, transaction or delivery channel risk factors, including whether the product or service is— (i) a life insurance policy for which the premium is low; (ii) an insurance policy for a pension scheme which does not provide for an early surrender option, and cannot be used as collateral; (iii) a pension, superannuation or similar scheme which satisfies the following conditions— (aa) the scheme provides retirement benefits to employees; (bb) contributions to the scheme are made by way of deductions from wages; and (cc) the scheme rules do not permit the assignment of a member’s interest under the scheme; (iv) a financial product or service that provides appropriately defined and limited services to certain types of customers to increase access for financial inclusion purposes in an EEA state; (v) a product where the risks of money laundering and terrorist financing are managed by other factors such as purse limits or transparency of ownership; (vi) a child trust fund within the meaning given by section 1(2) of the Child Trust Funds Act 2004(a); (vii) a junior ISA within the meaning given by regulation 2B of the Individual Savings Account Regulations 1998(b);
37(3)(c)	(c) geographical risk factors, including whether the country where the customer is resident, established or registered or in which it operates is— (i) an EEA state; (ii) a third country which has effective systems to counter money laundering and terrorist financing; (iii) a third country identified by credible sources as having a low level of corruption or other criminal activity, such as terrorism (within the meaning of section 1 of the Terrorism Act 2000(c)), money laundering, and the production and supply of illicit drugs; (iv) a third country which, on the basis of credible sources, such as evaluations, detailed assessment reports or published follow-up reports published by the Financial Action Task Force, the International Monetary Fund, the World Bank, the Organisation for Economic Co-operation and Development or other international bodies or nongovernmental organisations— (aa) has requirements to counter money laundering and terrorist financing that are consistent with the revised Recommendations published by the Financial Action Task Force in February 2012 and updated in October 2016; and (bb) effectively implements those Recommendations.
37(4)	In making the assessment referred to in paragraph (3), relevant persons must bear in mind that the presence of one or more risk factors may not always indicate that there is a low risk of money laundering and terrorist financing in a particular situation.
37(5)	A relevant person may apply simplified customer due diligence measures where the customer is a person to whom

	paragraph (6) applies and the product is an account into which monies are pooled (the “pooled account”), provided that— (a) the business relationship with the holder of the pooled account presents a low degree of risk of money laundering and terrorist financing; and (b) information on the identity of the persons on whose behalf monies are held in the pooled account is available, on request to the relevant person where the pooled account is held.
37(6)	This paragraph applies to— (a) a relevant person who is subject to these Regulations under regulation 8; (b) a person who carries on business in an EEA state other than the United Kingdom who is— (i) subject to the requirements in national legislation implementing the fourth money laundering directive as an obliged entity (within the meaning of that directive), and (ii) supervised for compliance with those requirements in accordance with section 2 of Chapter VI of the fourth money laundering directive.
37(7)	In determining what simplified customer due diligence measures to take, and the extent of those measures, when paragraph (1) applies, credit institutions and financial institutions must also take account of any guidelines issued by the European Supervisory Authorities under Article 17 of the fourth money laundering directive.
37(8)	A relevant person must not continue to apply simplified customer due diligence measures under paragraph (1)— (a) if it doubts the veracity or accuracy of any documents or information previously obtained for the purposes of identification or verification; (b) if its risk assessment changes and it no longer considers that there is a low degree of risk of money laundering and terrorist financing; (c) if it suspects money laundering or terrorist financing; or (d) if any of the conditions set out in regulation 33(1) apply.

ガイダンス名 : JMLSG Prevention of money laundering/combating terrorist financing, Part I²⁷

5.4 Simplified due diligence	
5.4.1	A firm may apply SDD measures in relation to a particular business relationship or transaction if it determines that, taking into account its risk assessment, the business relationship or transaction presents a low degree of risk of ML/TF.

²⁷ https://secureservercdn.net/160.153.138.163/a3a.8f7.myftpupload.com/wp-content/uploads/2020/07/JMLSG-Guidance_Part-I_-July-2020.pdf

5.4.2	<p>When assessing whether there is a low degree of risk of ML/TF in a particular situation, and the extent to which it is appropriate to apply SDD measures in that situation, a firm must take account of at least the following risk factors:</p> <p>(i) Whether the customer is –</p> <ul style="list-style-type: none"> ✓ a public administration, or a publicly owned enterprise 5.3.192/193 ✓ an individual resident in a geographical area of low risk ✓ a credit or financial institution subject to the requirements in the fourth money laundering directive (see paragraph 5.3.133) ✓ a company listed on a regulated market (see paragraph 5.3.155) ✓ firms holding a pooled account (see paragraph 5.3.142) <p>(ii) certain life assurance and e-money products (see Part II, sectors 7 and 3)</p> <p>(iii) certain pension funds (see paragraphs 5.4.4 and 5.3.228ff)</p> <p>(iv) Child Trust Funds and Junior ISAs (see paragraphs 5.4.5 - 5.4.7)</p>
5.4.3	Annex 5-III to this chapter sets out suggested Risk Factor Guidelines on Simplified Due Diligence, consistent with those issued jointly by the European Supervisory Authorities.
5.4.4	Subject to an assessment of the ML/TF risk presented, SDD measures may be applied to pension, superannuation or similar schemes which provide retirement benefits to employees, where contributions are made by an employer or by way of deduction from an employee’s wages and the scheme rules do not permit the assignment of a member’s interest under the scheme.
5.4.5	SDD measures may be applied to Child Trust Funds and Junior ISAs.
5.4.6	In respect of Junior ISAs, although SDD measures may be applied, firms will, however, in due course need to verify identity at the point the child reaches 18 years and becomes entitled to the funds, or at the next ‘trigger’ event thereafter (unless the child’s identity has by then already been verified for the purposes of some other relationship).
5.4.7	With Junior ISAs, the child is able to manage the account from the age of 16, in which case the firm might choose to undertake customer due diligence at that stage in order to avoid delaying any transaction the child should wish to undertake on reaching 18, when the account becomes a ‘full’ ISA. It is recommended that firms indicate in their product literature etc. what their policy will be when, for example, the child reaches 16 or 18.
5.4.8	SDD measures must not be applied, or continue to be applied, where: the firm’s risk assessment changes and it no longer considers that there is a low degree of risk of ML/TF; where the firm suspects money laundering or terrorist financing; or where there are doubts about the veracity or accuracy of documents or information previously obtained for the purposes of identity or verification.
5.4.9	A determination that SDD measures may be applied in a particular situation does not remove the obligation to conduct ongoing monitoring of the business relationship, although the extent of this may be adjusted to reflect its determination of the low degree of ML/TF risk. Such determination does not affect the duty to report knowledge or suspicion of money laundering or terrorist financing.

5.4.10	Firms should also document the rationale for the decision to apply SDD.
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香港

規制名 : Guideline on Anti-Money Laundering and Counter-Financing of Terrorism²⁸

4.1 What CDD measures are	
4.1.2	An AI should apply an RBA when conducting CDD measures and the extent of CDD measures should be commensurate with the ML/TF risks associated with a business relationship. Where the ML/TF risks are high, the AI should conduct enhanced due diligence (EDD) measures (see paragraph 4.9). In low risk situations, the AI may apply simplified due diligence (SDD) measures (see paragraph 4.8).
4.8 Simplified due diligence	
4.8.1	In general, an AI should carry out all four CDD measures set out in paragraph 4.1.3 before establishing any business relationship, before carrying out a specified occasional transaction, and continuously monitor its business relationship (i.e.

²⁸ <https://www.hkma.gov.hk/media/eng/doc/key-information/guidelines-and-circular/guideline/g33.pdf>

	ongoing CDD and transaction monitoring). As stated in Chapter 2, the extent of four CDD measures and ongoing monitoring should be determined using an RBA.
4.8.2	An AI may apply SDD measures in relation to a business relationship or transaction if it determines that, taking into account its risk assessment, the business relationship or transaction presents a low ML/TF risk.
4.8.3	SDD measures should not be applied or continue to be applied, where: (a) the AI's risk assessment changes and it no longer considers that there is a low degree of ML/TF risk; (b) where the AI suspects ML or TF; or (c) where there are doubts about the veracity or accuracy of documents or information previously obtained for the purposes of identification or verification.
4.8.4	The assessment of low risks should be supported by an adequate analysis of ML/TF risks by the AI.
4.8.5	The SDD measures applied should be commensurate with the nature and level of ML/TF risk, based on the lower ML/TF risk factors identified by the AI.
4.8.6	When an AI applies SDD measures, it is still required to continuously monitor its business relationship (i.e. ongoing CDD and transaction monitoring) in accordance with section 5 of Schedule 2 and Chapter 5.
4.8.7	Examples of potentially lower risk factors include: (a) customer risk factors: (i) a government entity or a public body ²⁸ in Hong Kong or in an equivalent jurisdiction; (ii) a corporation listed on a stock exchange and subject to disclosure requirements (e.g. either by stock exchange rules, or through law or enforceable means), which impose requirements to ensure adequate transparency of beneficial ownership; (iii) an FI as defined in the AMLO, or other FI incorporated or established in an equivalent jurisdiction and is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF; or (iv) a collective investment scheme authorised for offering to the public in Hong Kong or in an equivalent jurisdiction. (b) product, service, transaction or delivery channel risk factors: (i) a provident, pension, retirement or superannuation scheme (however described) that provides retirement benefits to employees, where contributions to the scheme are made by way of deduction from income from employment and the scheme rules do not permit the assignment of a member's interest under the scheme; (ii) an insurance policy for the purposes of a provident, pension, retirement or superannuation scheme (however described) that does not contain a surrender clause and cannot be used as a collateral; or (iii) a life insurance policy in respect of which: (A) an annual premium of no more than \$8,000 or an equivalent amount in any other currency is payable; or (B) a single premium of no more than \$20,000 or an equivalent amount in any other currency is payable. (c) country risk factors: (i) countries or jurisdictions identified by credible sources, such as mutual evaluation or detailed assessment reports, as having effective AML/CFT Systems; or (ii) countries or jurisdictions identified by credible sources as having a lower level of corruption or other criminal activity.
4.8.8	Examples of possible SDD measures include:

	<p>(a) accepting other documents, data or information (e.g. proof of FI's license, listed status or authorization status etc.), other than examples provided in paragraphs 4.3.7 and 4.3.12, for a customer falling within any category specified in paragraph 4.8.7(a);</p> <p>(b) adopting simplified customer due diligence in relation to beneficial owners as specified in paragraph 4.8.9 to 4.8.20;</p> <p>(c) reducing the frequency of updates of customer identification information;</p> <p>(d) reducing the degree of ongoing monitoring and scrutiny of transactions based on a reasonable monetary threshold; or</p> <p>(e) not collecting specific information or carrying out specific measures to understand the purpose and intended nature of the business relationship, but inferring the purpose and intended nature from the type of transactions or business relationship established.</p>
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シンガポール

規制名 : Notice 626 Prevention of Money Laundering and Countering the Financing of Terrorism – Banks²⁹

7. Simplified Customer Due Diligence	
7.1	Subject to paragraph 7.4, a bank may perform simplified CDD measures in relation to a customer, any natural person appointed to act on behalf of the customer and any beneficial owner of the customer (other than any beneficial owner that the bank is exempted from making inquiries about under paragraph 6.16) if it is satisfied that the risks of money laundering and terrorism financing are low.
7.2	The assessment of low risks shall be supported by an adequate analysis of risks by the bank.
7.3	The simplified CDD measures shall be commensurate with the level of risk, based on the risk factors identified by the bank.
7.4	A bank shall not perform simplified CDD measures - (a) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction in relation to which the FATF has called for countermeasures; (b) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction known to have inadequate AML/CFT measures, as determined by the bank for itself or notified to banks generally by the Authority, or other foreign regulatory authorities; or (c) where the bank suspects that money laundering or terrorism financing is involved.
7.5	Subject to paragraphs 7.2, 7.3 and 7.4, a bank may perform simplified CDD measures in relation to a customer that is a

²⁹ <https://www.mas.gov.sg/-/media/MAS-Media-Library/regulation/notices/AMLD/notice-626/MAS-Notice-626---Banks.pdf>

	financial institution set out in Appendix 2.
7.6	Where the bank performs simplified CDD measures in relation to a customer, any natural person appointed to act on behalf of the customer and any beneficial owner of the customer, it shall document - (a) the details of its risk assessment; and (b) the nature of the simplified CDD measures.
7.7	For avoidance of doubt, the term “CDD measures” in paragraph 7 means the measures required by paragraph 6.

規制名 : Guidelines to Notice 626 on Prevention of Money Laundering and Countering the Financing of Terrorism – Banks³⁰

7. Notice Paragraph 7 - Simplified Customer Due Diligence	
7-1	Paragraph 7.1 of the Notice permits a bank to adopt a risk-based approach in assessing the necessary measures to be performed, and to perform appropriate SCDD measures in cases where the bank is satisfied, upon analysis of risks, that the ML/TF risks are low.
7-2	Where a bank applies SCDD measures, it is still required to perform ongoing monitoring of business relations under the Notice.
7-3	Under SCDD, a bank may adopt a risk-based approach in assessing whether any measures should be performed for connected parties of the customers.
7-4	Where a bank is satisfied that the risks of money laundering and terrorism financing are low, a bank may perform SCDD measures. Examples of possible SCDD measures include — (a) reducing the frequency of updates of customer identification information; (b) reducing the degree of ongoing monitoring and scrutiny of transactions, based on a reasonable monetary threshold; or (c) choosing another method to understand the purpose and intended nature of business relations by inferring this from the type of transactions or business relations to be established, instead of collecting information as to the purpose and intended nature of business relations.
7-5	Subject to the requirement that a bank’s assessment of low ML/TF risks is supported by an adequate analysis of risks, examples of potentially lower ML/TF risk situations include — (a) Customer risk (i) a Singapore Government entity; (ii) entities listed on a stock exchange and subject to regulatory disclosure requirements relating to adequate transparency in respect of beneficial owners (imposed through stock exchange rules, law or other enforceable means); and (iii) an FI incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT

³⁰ <https://www.mas.gov.sg/-/media/MAS/Regulations-and-Financial-Stability/Regulations-Guidance-and-Licensing/Commercial-Banks/Regulations-Guidance-and-Licensing/Guidelines/MAS-Notice-626-Amendments-Nov-15/Guidelines-to-MAS-Notice-626--November-2015.pdf>

	<p>requirements consistent with standards set by the FATF.</p> <p>(b) Product, service, transaction or delivery channel risk</p> <p>(i) a pension, superannuation or similar scheme that provides retirement benefits to employees, where contributions are made by way of deduction from wages, and the scheme rules do not permit the assignment of a member's interest under the scheme; and</p> <p>(ii) financial products or services that provide appropriately defined and limited services to certain types of customers (e.g. to increase customer access for financial inclusion purposes).</p>
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(Appendix 3) Countering Money Laundering and Terrorist Financing- Education and Publicity- Multimedia³¹

香港政府ウェブサイト公表されている ML/TF のリスクに対する一般市民の意識を高めるための情報配信キャンペーンのメディア・コンテンツの概要は以下の通り。

コンテンツ名	概略 (KPMG 香港記載)
Safeguard Hong Kong's status as an international financial centre - YouTube	It is a TV announcement in the public interest aired in 2012 to promote the new law (i.e. The Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance) in the financial sector to safeguard Hong Kong's status as an international financial centre.
Micro-Film - The Stooges (police.gov.hk)	The Hong Kong Police Force aired a micro-film adapted from a real case in 2015 to raise public awareness about the criminal liability of money laundering arising from the opening of bank accounts for use of criminals. (It is conducted in Cantonese, cannot find English version)
Police Report - 2016-2-26 - YouTube	"Police Report" is a show conducted by the Hong Kong Police Force to bring some important messages to raise public awareness. This video was aired in 2016 by the Hong Kong Police Force to share two real-life examples of money laundering activities that may happen around the public and raise public awareness of these traps.

(Appendix 4) ヒアリング記録

今回対象とした 8 カ国の KPMG メンバーファームに対するヒアリング記録は以下のとおり。

³¹ <https://www.fstb.gov.hk/fsb/aml/en/edu-publicity/multimedia.htm>

米国

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none">✓ Like all jurisdictions, this is an issue, but for retail banking, US customers are used to providing information so it may not be as challenging as in some other countries.✓ People in the US are used to providing their information to banks, particularly high net worth individuals who tend to have numerous bank

		<p>accounts and regular interactions with banks.</p> <ul style="list-style-type: none"> ✓ There is not a regulatory requirement stipulating a set schedule for periodic review, and accordingly banks in the US do not take a consistent approach to scheduled OCDD, rather each bank adopts an approach according to the bank's risk appetite. That being said the regulatory expectation is that high risk customer are reviewed regularly and that there is a mechanism in place to ensure that all customer go through a periodic review when there are triggering factors. From this perspective, many banks do adopt a schedule to include all customer risks. <ul style="list-style-type: none"> ▪ Some banks have adopted a H=1 year/M=3 year/L=5 year approach for OCDD, while others do not perform periodic review for L risk customers at all. ▪ Some banks perform OCDD for M and L risk customers only based on trigger events, with H risk customers reviewed on a yearly basis in addition to monitoring for trigger events. ▪ Triggers are different for each bank. The bank needs to demonstrate to the regulator that the level of CDD and ongoing monitoring is commensurate with the customer risk.
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ Most customers in the US use online banking and customer interaction is mainly through the bank's app. ✓ Banks may send letters to customers via post, but this will be in conjunction with emails and interaction through the online banking app.
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and	<ul style="list-style-type: none"> ✓ In the US, when updated customer information is required, the bank will flag the customer's account as "Information pending" in the bank systems, both in the account and online. <ul style="list-style-type: none"> ▪ Online banking customers attempting to access their account online will then be prompted with a screen requesting the customer to provide the updated information in order to access the account.

	<p>status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)</p>	<ul style="list-style-type: none"> ▪ Customers who dial into a call center or enter a bank branch will be requested by bank staff to provide the updated information before being able to proceed with their transaction. ✓ Banks in the US take a very conservative approach to actually blocking/preventing transactions or freezing accounts as this may come into conflict with consumer protection regulations. Instead, as a first step banks will typically prevent the customer from using certain features of their online account until responses are provided; however, banks will still permit regularly occurring transactions (bill payment, salary deposit, etc.) to occur. ✓ If the customer still does not provide their updated information, the bank will undertake a review of the customer relationship and consult with the legal department to determine whether the customer's account should be frozen or closed from an AML risk perspective.
4	<p>Ease of obtaining the latest customer information through the spread of digital ID use</p>	<ul style="list-style-type: none"> ✓ No use of digital ID either by the government or by third party solution providers.
5	<p>The number of bank accounts for consumers and the impact on their willingness to provide information to banks</p>	<ul style="list-style-type: none"> ✓ Customers in the US may have numerous bank accounts in the US, but these accounts are typically utilized by customers on a regular or semi-regular basis. <ul style="list-style-type: none"> ▪ If there is no activity on an account for a certain period (3-5 years, depending on state law) and the bank cannot get in touch with the account holder, then the account becomes dormant and the bank begins procedures to move the account to abandoned property, which is managed by the state. ▪ The bank will notify the account holder that the account has become dormant and the customer will typically have to respond to the bank within a set timeframe to either claim the funds in the account or reactivate the account.

		<ul style="list-style-type: none"> ▪ If the customer does not respond to the bank notification, the balance of the account is turned over to the state treasury, where the funds are held as unclaimed property.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ Banks will assess a monthly fee on accounts that fall below a certain balance.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ This is standard practice for most customers at most banks. Obtaining this information online is faster than by post but banks still need to confirm and verify the information, which is largely still a manual process.
8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ Banks will utilize Lexis Nexus or other third party vendor solutions to triangulate customer information from external sources (e.g., public records of criminal history). Depending on the product for which the customer is onboarded, the social security provided by the customer may then be cross-referenced against, for example credit reporting databases (specifically for loans and/or credit card applications) to match the social security number provided by the customer to the customer's name. ✓ Banks also try to use other data elements known by the bank to supplement missing information in the customer information file. For example, for ongoing source of funds, banks will review the customer's transactions to identify the customer's occupation and then deduce that this is the customer's ongoing source of funds. ✓ Banks will build expected customer activity based on the information collected in the CDD process and then monitor the customer's transactions to check whether these two are aligned. If there is an inconsistency between the expected and actual activity the bank will perform an investigation to determine whether the customer's risk profile needs to be reevaluated, whether there is potentially suspicious activity occurring if the activity is unusual, and/or whether additional or updated customer

		information needs to be obtained.
9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none"> ✓ There is not a consistent practice at the industry level. Individual banks apply an approach consistent with their risk appetite outlined in #1-8 above. ✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.

英国

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none"> ✓ This is not viewed as an issue in the UK for the following reasons: ✓ There is an overarching obligation to ensure that customer information is up-to-date, but the obligation does not specify a specific timeline for this. ✓ High Risk customers are subject to enhanced levels of scrutiny, which results in an annual KYC review. ✓ On the other hand, the vast majority of banks will not apply OCDD to L Risk retail customers unless there is a material gap in the critical information from the customer (name, address, date of birth, nationality). ✓ Additionally, in order to obtain the information above, banks will typically rely on service providers offering electronic Identification & Verification (see #4 below) to verify the information through third party sources rather than contacting the customer directly. ✓ For data points that are not critical (e.g. occupation), banks will derive the data based on customer information already known, such as transaction information. For occupation, the bank would review the customer's transactions and for example if a fixed amount is deposited in the customer's account on a monthly basis, the bank would deduce that the customer is an employee of that company.

2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ Most customers in the UK use online banking and therefore customer interaction is mainly through online banking applications. ✓ At the same time, most banks in the UK will adopt a multi-channel approach to allow the customer to respond in the manner that is most convenient to the customer. <ul style="list-style-type: none"> ▪ For example, the bank will send a letter to the customer, but the content of the letter will also appear as a message within the customer's online banking app, and call center staff, bank branch staff will also be alerted when speaking to the customer. The customer can then choose which channel to use to provide the information. ✓ Digital channels are very effective for obtaining updated identification documents because the bank can provide detailed guidance to the customer that is not possible via post. Verification of the documents can also be performed using service providers to provide feedback to the customer in real-time (as opposed to the image being sent to the bank via post, reviewed by the bank for several days/weeks, then going back to the customer for additional information). ✓ To obtain updated information from customers, banks will try to link communication with customers to existing interactions that the customer has with the bank. ✓ For online banking customers, the next time the customer logs into their online banking app, the customer will be prompted to provide updated information. ✓ For non-online banking customers, the customer account will be flagged so that the next time the customer calls into a call center or visits a branch, bank employees will request the information from the customer. ✓ Additionally, banks will use BAU interactions with customers, such as inquiry regarding a new product or changing the terms of an existing product to review or refresh the customer data, irrespective of where the
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		<p>customer is in the periodic review cycle. In such cases, the bank will ask the customer whether the information is still up-to-date and use that opportunity to fill in any gaps in information. The customer is then incentivized to provide that information because they are seeking a product or service from the bank.</p> <ul style="list-style-type: none"> ✓ Case study: KYC remediation engagement for GSIFI <ul style="list-style-type: none"> ▪ Using letters to reach out to customers: 5% response rate ▪ Online banking app w/multi-channel approach above: 90% response rate
3	<p>The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)</p>	<ul style="list-style-type: none"> ✓ Restrictions on accounts are applied following a reasonable amount of time and number of attempts to obtain updated information from the customer. ✓ If a customer has mail returned as “person not at that address”, this will be a trigger to limit customer activity on the account, because the bank would be concerned of the fraud risk associated with the account. ✓ Banks will take an incremental approach to placing restrictions on a customer’s account. This is due to recent cases where banks have placed heavy restrictions on customer accounts which directly resulted in a negative impact on the customers quality of life, such as credit scores suffering due to inability to pay on a mortgage or electricity being cut off due to inability to pay electrical bill. <ul style="list-style-type: none"> ▪ First the bank would restrict the customer’s ability to withdraw cash or to initiate new payments outside the regular payment cycle. ▪ Regular payments will still be permitted, but discretionary payments (e.g. one-off payments to individuals or shopping) will not be permitted. ▪ If there is still no response from the customer following the restrictions above, the bank will assess the situation and determine whether the gap has a regulatory implication or cannot be derived from internal sources or obtained from a third party.

		<ul style="list-style-type: none"> ▪ In such cases, the bank will issue a notice notifying the customer that the account will be closed within 90 days. The funds will then be made available to be returned to the customer once they contact the bank. ✓ There is not a piece of regulation that clearly articulates what banks can and cannot do in terms of account closure. The Money Laundering Regulations state that banks cannot maintain a relationship with a customer if they are unable to complete customer due diligence. Banks will make a decision on whether to limit or close a customer account based on their assessment of the criticality of the gaps in customer information. ✓ The bank's discretion to limit a customer's transactions or close the account is also stipulated in the terms and conditions of the contract with the customer.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ There is not a digital ID in the same sense of other countries such as Singapore. ✓ The UK does have electronic Identification and Verification (ID&V), where a third party service provider (Experion and Equifax as credit agencies, Fintechs such as Onfido and Jumio) will access a number of data sets from government records, public sources and from participating banks to triangulate name, address, date of birth. For example, to obtain address information the ID&V service would access the Electoral Register. <ul style="list-style-type: none"> ▪ By using this scheme, the banks can verify customer information independently using third party information rather than contacting the customer directly.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ It is not uncommon for consumers in the UK to have multiple bank accounts. <ul style="list-style-type: none"> ▪ Consumers will often have a traditional bank account (HSBC, Barclays, etc.), as well as a FinTech bank account (Revolut, etc.) that allows better international services, which may be used for specific purposes (such as for international travel) rather than on a day-to-day basis.

6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ No monthly maintenance fees on customer accounts.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ The response rate from customers is much higher via digital channels vs. sending letters (90% vs. 5%). ✓ Additionally, online verification of identity documents results in a substantial reduction in resources required by the bank in comparison to manually reviewing and confirming copies of identification documents received.
8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ Banks will review customer transactions to look for indicators that a customer has changed occupation or address, and if such indicators are identified this will trigger a KYC review. ✓ Banks will use third party service providers to obtain customer information from multiple sources such as government records, publicly available information or even from other FIs participating in electronic ID&V schemes (see #4 above).
9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none"> ✓ There is not a consistent approach applied at the industry level. Individual banks obtain updated customer information from third party information (#4 above) along with multi-channel communication with customers (#2 above). If banks are unable to obtain updated customer information through these means, they will apply restrictions on customer accounts on an incremental approach, and may close the customer account if the bank determines that the information gap results in a substantial risk from an AML compliance perspective. ✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.

ドイツ

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none">✓ Banks face challenges in obtaining the latest information about existing customers to some extent, but this issue has been mitigated by the risk classification framework for retail customers, as well as the requirement to offboard customers who do not provide updated customer information (see #3 below).✓ The supervisory expectation is that banks with similar characteristics will

		<p>follow a similar periodic review cycle.</p> <ul style="list-style-type: none"> ✓ About three years ago, common practice for mass market retail banks was (H= 1 year/ M= 3 years/ L= 5 years), but the recent update of the regulatory guidelines allows banks to have even more relaxed frequencies: 2 / 7 / 15 years. Still we see that banks remain stricter than required ✓ For inactive accounts no update of the KYC files are required.
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ The majority of contact with customers through online banking apps and email. ✓ If customers cannot be contacted through digital media, as a secondary approach the bank would send a letter by post, but this would be after numerous attempts to contact the customer by digital means and would be indicative of an issue in communicating with the customer.
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)	<ul style="list-style-type: none"> ✓ If a customer does not provide updated information despite repeated attempts to contact the customer, the Application Guidelines for the Money Laundering Act stipulate that customer must ultimately be offboarded. <ul style="list-style-type: none"> ▪ Common practice is to do this through a gradual approach, where banks would place a block on the customer account, preventing new/discretionary transactions, while continuing to permit inflow of funds and debit transactions such as bill paying. ▪ If the bank is still unable to obtain updated customer information despite additional requests to the customer, the account would then be terminated. ▪ This is consistent with the German Money Laundering Act, the Application Guidelines for the Money Laundering Act and the EU regulations. ✓ The terms and conditions of the deposit account contracts stipulate that the customer must provide up-to-date and complete information requested by the bank, and if the customer does not provide this information that the bank is obligated to terminate the account.

		<ul style="list-style-type: none"> ✓ Most customers in Germany are not averse to providing their information to banks. Historically, customers have had a close relationship with their banks, and customers are open to providing personal information to banks in Germany.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ The German National Identity Card includes an electronic identity verification function and can be used both for accessing public services as well as for interaction with private companies, such as for banking. In theory this could be used for CDD, but in reality, it is not widely implemented by banks. The reason for this is that most German citizens have opted not to activate the electronic component of their identification due to (1) data privacy concerns, (2) a burdensome process to activate the electronic ID component and (3) the current lack of services where the electronic ID can be used. ✓ Another reason that the electronic ID has failed to gain traction is that for onboarding customers are still required to appear in-person and produce a physical ID for verification at a branch. <ul style="list-style-type: none"> ▪ There are alternatives allowed to this such as Video ID (where a compliance professional verifies the customer’s identity via a live two-way video link) or POSTIDENT (where Deutsche Post employees perform identity verification on behalf of the bank and transmit the confirmed ID data to the bank upon verification). POSTIDENT has been widely used as an option by banks, but Video ID has been plagued with issues and not well received by banks. ▪ There are solution vendors which Video ID services (Scalable Capital, ID Now, WebID and others), but these companies are more focused on the strategic leveraging of data rather than offering viable onboarding services, and as a result they are currently not commonly used by banks in Germany.

5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ It is normal for customers to have multiple bank accounts in Germany. ✓ The trend within the past 10-15 years will jump from bank to bank looking for better interest rates, driven by the low interest rates in the EU region (some banks will temporarily offer a higher interest rate to recruit new customers). ✓ Younger consumers are also more likely to hold multiple bank accounts, with one traditional bank account and two or more FinTech accounts. ✓ Customer accounts are not normally shut down accounts due to lack of activity. In such cases, customers will be sent many marketing materials trying to prompt them to engage in transactions, and once there is activity on an account that has been inactive for a long period of time this will likely trigger a KYC review, where the bank will request updated information from the customer. If the customer does not provide the information requested, then he or she would be subject to the restrictions outlined in #3 above.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ An annual account maintenance fee (around EUR4, depending on the bank) is assessed on all retail bank accounts. ✓ There are no maintenance fees assessed if an account balance falls below a certain threshold; actually, if a bank account has a balance above a certain threshold, customers will have to pay fees to the bank due to the EU negative interest rate.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ Customers will typically use either the online banking platform or email to upload their latest information Can use portals for OCDD. Some banks will still send requests for updated information by post (where the customer will provide copies of their identification information by return post), but this is an increasingly less common practice. ✓ For onboarding CDD, customers are still required to appear in-person and produce a physical ID for verification at the bank branch, or use one of the permissible alternatives, such as Video ID or POSTIDENT outlined in #4

		above.
8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ Currently transaction data and KYC data are not systematically linked. Transaction monitoring is still a very manual process and the TM scenarios are not tied to the customer's risk rating, nor is transaction activity used to extract information for KYC or fed back into the KYC process. This is considered the next step in the evolution of AML in Germany. Both banks and the German regulator are behind in comparison to other global leading jurisdictions. ✓ The exception to this would be Deutsche Bank, as a GSIFI headquartered in Germany. Due to the numerous sanctions assessed by US regulators, Deutsche Bank has a transaction monitoring framework to monitor customer activity against expected activity, but this is the only bank with such practices in the market.
9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none"> ✓ There is no standard practice outlined at the industry level. ✓ Recent updates of regulatory guidelines explicitly mention that there is a possibility to update certain client data without the need to have the information provide by clients – opening the opportunity to use publicly available data (without any further specification with regard to the requirements to these sources) ✓ Standard practice by banks is to block customer accounts in a graduated approach, ultimately closing the account if the bank cannot obtain updated customer information (see #3 above). ✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.

スウェーデン

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none"> ✓ Today the overall observation is that Swedish FIs have been stepping up their OCDD processes and become more efficient obtaining updated KYC information regarding their customers. They rely on digital tools and information to ensure the KYC is kept up to date. This was overcome by a combination of migration to widespread use of online banking apps, use of digital IDs (such as Swedish “BankID”) for CDD, a shift of banks to accessing third party data (public registers) to complete the CDD/OCDD process, and also use of banking apps to collect updated KYC information. ✓ No specific timeline for KYC refresh specified in legislation, but standard practice among majority of FIs is (H=1 year/M=2 year/L=3 year). ✓ In combination with the periodic review, banks will also conduct OCDD in response to trigger events identified in transaction monitoring. ✓ Additionally, rather than contacting the customer directly, banks will first access public information such as official registers (for example the tax authority register, beneficial owner registry) to identify any updated customer information, then request that the customer verify that the information is correct.
2	Means of contacting existing customers (by post,	<ul style="list-style-type: none"> ✓ Online banking apps are the main channel used for communication with existing customers.

	emails, apps, etc.)	
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)	<ul style="list-style-type: none"> ✓ Following the Danske Bank/Swedbank ML scandals in 2018-19, banks have taken a much more proactive approach to dealing with customers who have not responded to requests for updated information. <ul style="list-style-type: none"> ▪ Whereas previously banks would be reluctant to freeze accounts, if customers fail to respond to repeated requests for updated information, banks are now much faster to restrict access to products and services until customers provide the updated information. ▪ Additionally, The Swedish AML regulation stipulates that if complete, up-to-date KYC information cannot be obtained, a FI must terminate the relationship with the client. As a result, while banks will take a gradual approach to freezing customer accounts, if updated customer information cannot be obtained banks are obligated to close the customer account and do so. This is also clearly stipulated in the terms and conditions of bank account contracts with clients as well as clearly visible on bank websites. ▪ Since this is a regulatory requirement, is clearly communicated to customers and is standard practice across all banks in Sweden, it is accepted by customers. The Swedish Banker's Association have also played an important role in facilitating common information to bank customers through their website.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ "Swedish Bank ID" is, among other digital IDs, used for identifying and verifying customers in both CDD and for OCDD.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ Most customers in Sweden have only one or a few number of bank accounts.

6	Presence or absence of an account maintenance fee	✓ Not aware of any account maintenance fees.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	✓ Widespread use of online banking apps in combination with digital ID and access to public registers results in a reduced burden on FIs in collecting and verifying CDD and OCDD customer information.
8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ When onboarding customers, banks are required to collect a broad range of information from customers in addition to identification information, such as detailed information regarding the purpose and nature of the business relationship, including: e.g. monthly salary and employer, source of funds/wealth, expected monthly incoming transactions and outgoing transactions (including expected number of transactions and amount of transactions). ✓ If banks are skilled at obtaining this information during customer onboarding, transaction monitoring can be tailored to each customer's profile. ✓ Ideally transaction monitoring system scenarios are then tailored to the customer profile, but in reality, banks are relying on traditional transaction monitoring systems with pre-defined "out-of-the box" scenarios which are not tailored to expected customer activity. ✓ In practice, banks do not extract information useful for the KYC process but rather rely on information obtained from the customers during onboarding, however, tailored KYC monitoring is on the rise in Sweden.
9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none"> ✓ There is no standard practice outlined at the industry level. Standard practice by FIs is to restrict and/or freeze customer accounts in a graduated approach, ultimately closing the account if the bank cannot obtain updated customer information (see #3 above). ✓ Additionally, there is no incentive program used by banks or industry to

		obtain updated customer information.
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オーストラリア

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the	<ul style="list-style-type: none"> ✓ Not considered to be an issue in Australia. ✓ KYC refresh frequency is not stipulated in regulations.

	latest information about existing customers?	<ul style="list-style-type: none"> ✓ Standard practice 5 years ago was periodic review based on the customer’s risk (1/3/5), but banks found that this was too burdensome and many chose to implement periodic review only on H risk customers, with M and L review occurring only as a result of a trigger event. ✓ Recently the regulator has told a major bank that KYC refresh must be performed on a 1/3/5 year periodic cycle, so banks are starting to follow this trend again, which means that the refresh process will likely be more labor intensive in the future. On the other hand, mechanisms for obtaining this information are built into online banking apps, which is how most banks interact with customers in Australia, and banks continue to work towards automating this process as much as possible. ✓ KYC requirements in Australia: <ul style="list-style-type: none"> ▪ Minimum requirements for individuals are collection of name, address, date of birth information from the customer. ▪ While it is a regulatory requirement to verify KYC information, this can be done either by documents or electronic verification (voters roll, etc.). With electronic verification, it is not a regulatory requirement to collect copies of the ID underlying the information provided. This has resulted in numerous cases of identity fraud. Now banks are trying to implement more robust verification measures such as collecting the specific information (reference numbers, dates, etc.) from the ID documents (such as passport and driving license, etc.), so this information can be verified using AUSTRAC’s Document Verification Service(DVS) and/or utilizing facial recognition (from the copy of the passport and driving license, etc.) like E-KYC for opening accounts online.
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ In Australia, the majority of customer interaction for retail accounts (including account opening and ongoing customer interaction) take place through online and banking apps (which has been increased as a result of

		COVID and virtual communications).
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)	<ul style="list-style-type: none"> ✓ The AML/CTF Act stipulates that banks may determine not to proceed with a transaction based on their discretion. ✓ Bank account terms and conditions will contain a clause stating that the bank can freeze or terminate a customer account at the bank's discretion. ✓ In practice, it is very easy to put a freeze or terminate a deposit account since this simply involves returning the funds to the customer. It becomes more complicated for credit products such as mortgages, credit cards and loans (where the bank needs to obtain remaining loans from the customer). For such products, banks will restrict customer activity to only allow the customer to repay those loans and not allow the customer to use any additional products.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ N/A- Digital ID in Australia is not currently being considered due mainly to data privacy concerns.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ Australian consumers may have numerous accounts but there is not a trend of keeping accounts without any activity since such accounts would be frozen by the bank or once the account goes dormant (after 1 to 2 years of inactivity), the account will be closed and the funds will be absorbed by the government.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ Banks will assess a monthly fee (usually \$5) if a customer does not maintain a deposit of a certain amount (usually \$1,000 per month).
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ Approx. 80% of customers use online banking. Updated information requests from these customers are handled through the bank's app. When the customer logs in, they will be prompted with a screen requesting them to provide their updated information. ✓ For the 20% of customers who do not use online banking, the bank will

		<p>use a combination of means to contact the customer (email, phone, letter). If the customer does not respond, the bank will place a block on their account which forces the customer to contact the bank, at which point the bank will again request the updated information from the customer and not allow the customer to proceed with transactions until the updated information has been provided.</p>
8	<p>Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?</p>	<p>✓ This is used mainly for tracking the activity of High risk customers. Banks will look at the customer’s transactions through transaction monitoring to determine whether the transactions match up with the customer’s KYC profile (such as occupation) and source of funds/source of wealth. If the transactions do not align with the customer’s profile, this will trigger a transaction review and depending on the outcome of this review, a KYC review may be required, and the bank may contact the customer for updated information.</p> <ul style="list-style-type: none"> ▪ Currently this is a very manual process. AML operations at banks have been increasing their headcount to process both transaction monitoring and KYC reviews- they are finding that this is not sustainable and are trying to figure out how to utilize technology to increase efficiency as the current manual process is not sustainable. ▪ There has been an emergence of FinTechs such as Simple KYC and First AML who are offering solutions around KYC remediation and there has been a recent trend by banks to utilize these solutions rather than engaging large consulting firms.
9	<p>Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers</p>	<p>✓ There is not a consistent approach at the industry level for measures taken when banks are unable to obtain updated information from customers.</p> <p>✓ Individual banks will, after numerous attempts to contact a customer for updated information, block a customer account and then (a) prompt customers for updated information through online banking apps (for customers using online banking) or (b) rely on the account block to force</p>

		<p>customers to contact the bank (via call center or physical access to a branch) where the bank will then obtain updated customer information.</p> <p>✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.</p>
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香港

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<p>✓ There are still some issues with obtaining updated customer information, but this is in specific cases. For example, for an individual who holds a private company where the information is not publicly available (a private individual generating wealth). For normal individual retail customers, this is not considered an issue compared to 10 years ago.</p> <ul style="list-style-type: none"> ▪ 10 years ago, customers didn't understand why they had to provide information and there was a reluctance to provide this information and also banks were less aggressive about collecting this information. ▪ Around this time, HKMA started levying heavy fines against banks for AML/CFT failures including failure to obtain complete and up-to-date customer information, which caused banks to take their AML/CFT obligations much more seriously.

		<ul style="list-style-type: none"> ▪ Additionally, both the government and banks engaged in marketing campaigns such as television advertisements to raise public awareness of AML/CFT risks. ▪ Now, general public is more widely educated and open to providing information. ✓ The introduction of FATCA/CRS information collection requirements also helped to ease customers' acceptance to provide information. ✓ AML regulations stipulate that H Risk customers are subject to periodic review at least on an annual basis. For L and M risk customers, the schedule for periodic review is on a risk-based approach depending on the bank's risk appetite. ✓ Private banks typically adopt a periodic review model that follows (H=1 year/M=2 years/L=3 years) due to higher inherent AML/CFT risk in private banking ✓ The practice among mass retail banks varies, but the recent trend is for L Risk customers to be scoped out of periodic review, subject only to trigger-event based review, with M Risk customers reviewed every 2 or 3 years and H Risk customers reviewed every year (in addition to trigger-event based reviews).
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ This practice varies from bank-to-bank. <ul style="list-style-type: none"> ▪ Most banks contact their customers by telephone to request additional information. Banks have found that this channel elicits the highest response rate from customers in comparison to requests for information by post, and as a result post is not typically used for requests for updated customer information. ▪ Some banks have a requirement that relationship managers meet with their customers on an annual basis.

		<ul style="list-style-type: none"> ✓ Virtual banks have been moving more towards remote onboarding solutions, where ID information can be uploaded through a banking app portal, but this is still not widely adopted in the market since virtual banks only came into the market in Hong Kong in the past two years. Even for virtual banks, customers will be contacted first by phone to provide updated information, which they would then be able to upload via the virtual bank app.
3	<p>The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)</p>	<ul style="list-style-type: none"> ✓ When opening an account, if the bank is not able to obtain all necessary customer information to open the account, the bank will perform a review to determine whether to reject the account or escalate the case for approval from senior management to open the account but restrict the types of transactions possible on that account. The bank would then obtain the additional information from the customer within a specific timeline (90 days) before allowing the customer to all functionality of the account. ✓ For OCDD, if the client cannot be reached or refuses to provide updated information, the standard practice by banks in Hong Kong is to apply the so-called Three Strike Policy: <ul style="list-style-type: none"> ▪ After attempting to contact the customer without success, the bank will perform a compliance review, depending on the customer’s AML/CFT risk and/or depending on whether a specific transaction is subject to suspicious transaction reporting. The bank will then file an STR and/or reassess the customer’s risk rating. If three STRs are filed within a two year period, the bank will close the customer’s account. ✓ The terms and conditions of retail banking contracts stipulate that banks have the discretion to close customer accounts for refusing to provide complete and up-to-date customer information. The content of these contracts is explained to customers at the time the customer completes the contracts. ✓ The regulations stipulate that banks take a risk-based approach when

		considering whether to continue relationships with customers, rather than specific requirements for banks to close a customer's account. In practice, most banks adopt the three-strike policy outlined above.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ In Hong Kong, Digital ID (iAM Smart) was launched in December 2020, and in May 2021 the HKMA updated its AML/CFT FAQ to clarify how digital ID can be used for remote onboarding. On the other hand, digital ID for CDD has not adopted by banks as of August 2021.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ It is common for consumers to have multiple (three or more) accounts. Hong Kong's financial environment is extremely competitive, and banks will offer various incentives to customers for opening new accounts. ✓ These accounts are typically held for different purposes (e.g. one account for fixed deposit, one for savings, one for investment) and each of these will have different interest rates. ✓ Since these accounts are used for specific purposes, it is not common for accounts to be held for long periods of time without any activity.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ Account maintenance fees were introduced by most banks in Hong Kong in 2001, where monthly fees were assessed against accounts failing to maintain a minimum balance. ✓ Over the past couple of years, some banks have abolished this fee in an effort to stay competitive with virtual banks emerging in the market, and there has been a trend for more banks to follow suit. As a result, it is not common for retail bank accounts to assess maintenance fees on accounts comparing with past years as of August 2021.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ Larger banks are starting to offer the functionality for customers to upload their information via online banking app, but this has yet to reach critical mass among consumers. ✓ While younger consumers are starting to use this technology, older generations of consumers still tend to conduct all of their banking at the branch.

8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ Banks may have a TMS in place for monitoring ongoing transactions, but their transaction data and KYC data might not be systematically linked. Transaction monitoring and periodic review is still a very manual process, TMS scenarios are not tied to the customer's risk rating, nor is transaction activity used to extract information for KYC or fed back into the KYC process. ✓ Banks in Hong Kong still lack the adequate data governance and data integrity to implement this type of linked system and to perform data analytics on such data.
9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none"> ✓ At the industry level, over the past ten years the HKMA has been very proactive in raising customer awareness around the risks of AML/CFT as well as AML/CFT compliance, including the need to provide up-to-date information (see #1 above) ✓ Individual banks have also made efforts to raise such customer awareness, clearly specifying that accounts may be closed for refusal to provide up-to-date information, and adopting the Three Strike Policy (see #3 above). ✓ These measures have resulted in a culture of AML/CFT awareness and acceptance by customers to provide their information to banks. ✓ There is no incentive program used by banks or industry to obtain updated customer information.

シンガポール

#	Viewpoint	Discussion Details
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1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none"> ✓ This is not considered an issue by retail banks in Singapore. ✓ Normal practice is to categorize retail customers as either “Standard” Risk or “High” Risk. The vast majority of retail customers are categorized as “Standard” Risk and these customers are not subject to OCDD unless there is a trigger event identified in transaction monitoring. ✓ Additionally, banks in Singapore will use customer interaction occurring in BAU (e.g. car loan applications or marketing communication to raise credit limits on credit cards) to confirm/obtain the latest customer information. ✓ Customers view this as normal and do not object to these practices.
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ In Singapore, a large number of retail customers use online banking via the bank’s web app. <ul style="list-style-type: none"> ▪ As a suggestion, updated customer information due to a trigger event could be obtained after logging into the bank app a screen would appear prompting the customer to confirm their latest information. The customer would not be able to proceed with any transactions until they provide/confirm this information, which is normally done by allowing the bank access to the customer’s MyInfo. ▪ Based on KPMG experience, if the trigger event requires the bank to obtain additional information from a customer regarding a specific transaction, the bank would usually call the customer to verify the details of the transaction and would obtain supporting evidence for the transaction from the customer if necessary.
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of	<ul style="list-style-type: none"> ✓ From KPMG observations in the industry, banks in Singapore can freeze or terminate accounts at their discretion. ✓ The terms and conditions for deposit accounts generally do stipulate that information provided to the bank has to be up to date. AML regulations in Singapore do state that should verification not be completed by 30 business days, the bank has to suspend business relations with the customer. After 120 days and verification remains not completed, the bank has to terminate

	provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)	<p>the business relations with the customer.</p> <ul style="list-style-type: none"> ✓ KPMG SG is not aware of specific underlying regulation that prevents banks from closing bank accounts. Rather this is a risk-based decision in line with MAS strong regulatory stance towards AML/CFT compliance.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ Use of digital ID for providing customer information in account opening and on an ongoing basis is normal practice in Singapore. Customers provide the bank with access to MyInfo through SingPass. MyInfo is then used as customer identification information. ✓ MyInfo draws information from the respective government agencies in Singapore. Individuals living in Singapore are required to update their information (e.g. address). Example, if a person has moved residences, the individual has to go to the police post to update their address. This address is then updated in government databases which will then flow into MyInfo.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ It is not unreasonable for customers in Singapore to have numerous bank accounts. One reason for this is because the deposit insurance scheme in Singapore covers up to SGD75,000 per account, so customers may hold numerous bank accounts in order to diversify their risk. ✓ Bank accounts in Singapore with no activity for a certain period (typically 12 months) are frozen, and the next time the customer logs into their bank account they will be prompted with a screen stating that the account has been frozen and requesting the customer to contact the bank.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ Account maintenance fees are normal practice in Singapore. Based on the review of websites of 3 local banks in Singapore, if the average daily account balance falls below SGD500, a monthly fee of SGD2 is levied.
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ Normal practice in Singapore is for the customer to provide their digital ID information (i.e. MyInfo) through the bank's app. This is done through API connection between the bank's app and SingPass, which greatly reduces the bank's burden in obtaining information.

		<ul style="list-style-type: none"> ✓ Since MyInfo information is verified by the government, the bank's burden in terms of verifying the information is nonexistent.
8	<p>Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?</p>	<ul style="list-style-type: none"> ✓ Based on KPMG understanding, we do know that there is a retail bank in Singapore that utilize data analytics to determine whether a customer's transactions are in line with the customer's expected activity based on the customer's risk profile. <ul style="list-style-type: none"> ▪ If outlying transactions are identified, depending on the transaction the bank will contact the customer for additional information on the transaction, if necessary reperform KYC based on the transaction patterns, or issue an STR and block/terminate the account. ▪ MAS has been very supportive of developing FIs data analytics capabilities and has also mentioned of banks in Singapore being able to use data analytics capabilities to identify suspicious activities (point 6 in link below) ▪ https://www.mas.gov.sg/news/speeches/2021/forging-ahead-on-our-aml-cft-journey-together ✓ MAS requires that banks maintain an audit trail to provide supporting evidence for these decisions.
9	<p>Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers</p>	<ul style="list-style-type: none"> ✓ As mentioned above, banks in Singapore have to comply with AML regulations which requires them to suspend/terminate accounts if verification is not completed. ✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.

インド

#	Viewpoint	Discussion Details
1	Do FIs in your country have difficulty obtaining the latest information about existing customers?	<ul style="list-style-type: none">✓ This is not a major issue in India but is observed on a limited basis.✓ KYC refresh in India is every 10 years for L Risk, 8 years for M and 2 years for H.✓ Nearly all bank accounts for customers with access to digital media are linked to the customer's Aadhaar and banks access Aadhaar (after obtaining the customer's consent) to perform KYC refresh for such accounts.✓ In reality, banks take a risk-based approach to KYC refresh, focusing mainly on H risk customers. For H risk customers the banks will reach out to the customer directly to obtain additional information when the customer is scheduled for KYC review.✓ Banks have difficulties obtaining the latest information for customers who

		do not have access to digital services.
2	Means of contacting existing customers (by post, emails, apps, etc.)	<ul style="list-style-type: none"> ✓ The majority of customers are contacted by email or online banking apps, but customers without access to digital media are contacted by post because the customers may not have email accounts or even telephones.
3	The use of/methods of restricting or suspending transactions for non-cooperative customers in terms of providing updated information, customer response to such measures, the underlying laws and regulatory guidance (guiding principles) and status of regulations, and the existence of provisions in the contracts between FIs and customers (Presence or absence of an environment or mechanism that allows for transaction restriction)	<ul style="list-style-type: none"> ✓ The RBI Master Direction on KYC clearly stipulates that banks must eventually terminate accounts if KYC cannot be completed within a specific period (this includes completion of KYC refresh). <ul style="list-style-type: none"> ▪ In practice this is accomplished through placing a block on the customer's account preventing the customer from any debit transactions until they contact the bank to provide the updated information. ▪ For online banking customers, a message will appear on their app after logging in prompting them to provide the updated information directly through the app and allow the bank to access the customer's Aadhaar information, or to contact the customer service center or visit the bank branch directly. ▪ For customers who do not use online banking, the bank will make numerous attempts to contact the customer by telephone or by post.
4	Ease of obtaining the latest customer information through the spread of digital ID use	<ul style="list-style-type: none"> ✓ The majority of customers' bank accounts are linked to their Aadhaar and this makes both the onboarding process and the KYC refresh process much easier for banks, since the bank can access the customer's Aadhaar information after obtaining the customer's consent. ✓ On the other hand, the Aadhaar information for customers with older bank accounts or underbanked customers in remote areas may not be linked to their bank accounts or may not be up-to-date, and obtaining updated customer information from this customers is difficult because they usually do not have email and in many cases do not have a phone. In such cases banks must rely on sending requests by post, but even following up with

		customers who do not respond is difficult as the only channel for doing so is by post.
5	The number of bank accounts for consumers and the impact on their willingness to provide information to banks	<ul style="list-style-type: none"> ✓ Customers may have numerous bank accounts, but customers will typically use these accounts. ✓ If a customer does not carry out any transactions in a bank account for twelve consecutive months, the bank will classify the account as dormant and all activity on the account is blocked until the customer submits a request to resume activity on the account. In such situations KYC will be reperformed for the customer and banks may assess a fee to reactivate the account, but this practice varies from bank to bank.
6	Presence or absence of an account maintenance fee	<ul style="list-style-type: none"> ✓ Account maintenance fees are typically assessed by banks if a minimum balance is not maintained. Banks do not charge a fee for inactivity on an account but may charge a fee to reactivate dormant accounts (see #5 above).
7	Does the widespread use of the customer uploading their updated information via the FI's website lead to reduced burden on FIs?	<ul style="list-style-type: none"> ✓ KYC and KYC refresh for online banking customers utilizes Aadhaar. This reduces the bank's burden in verifying the customer's information, since the information obtained from the customer is compared against the Aadhaar information, which has been verified by UIDAI.
8	Is there a mechanism (system) used by FIs to extract information from transaction data necessary and useful for the KYC process from transaction data (e.g. whether the consumer is a salaried worker or a pensioner)?	<ul style="list-style-type: none"> ✓ Banks can access the Aadhaar database or Permanent Account Number (PAN) database after obtaining permission from the customer. This information is then compared against the customer's transactions through transaction monitoring to check whether the customer activity aligns with the customer information held by the bank and the information held in Aadhaar and the PAN database. ✓ In practice, banks reassess the appropriateness of their customer risk rating for customers every six months based on customer transaction activity.

9	Measures taken by individual FIs and the financial services industry when banks have difficulty obtaining the latest information about existing customers	<ul style="list-style-type: none">✓ For H Risk customers, banks will have extensive reach out to the customer to obtain updated information. For M and L Risk customers, banks do not tend to consider these high priorities as banks rely on Aadhaar for obtaining this information for the majority of customers.✓ Additionally, there is no incentive program used by banks or industry to obtain updated customer information.
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