

マネー・ローンダリングおよびテロ資金供与対策方針

株式会社中国銀行

株式会社中国銀行（以下「当行」といいます。）は、マネー・ローンダリングおよびテロ資金供与（以下「マネロン・テロ資金供与」といいます。）への対策が国内のみならず国際的にも要請されている重要な課題であることを認識し、時々変化する国際情勢および直面するリスク等に対して機動的かつ実効的な対応を実施していくための管理態勢を主体的に構築し、業務を遂行する基本方針として次のとおり本方針を定めます。

1. 運営方針

当行は、国際情勢等の変化に対し機動的かつ実効的な対応を実施するため、自らのマネロン・テロ資金供与リスクを適時適切に特定・評価し、リスクに見合った低減措置を講じる「リスクベース・アプローチ」の考え方に則った管理態勢を積極的に維持・構築します。

2. 組織態勢・責任者

当行は、マネロン・テロ資金供与対策を経営の最重要課題の一つと位置付け、行内の役割および責任を明確にします。コンプライアンス部担当役員をマネロン・テロ資金供与対策に関する統括管理責任者とし、コンプライアンス部内に設置する専担部署をマネロン・テロ資金対策の徹底を図るための統括部門とします。

3. マネロン・テロ資金供与対策に関する法令上の措置

当行は、取引時確認、取引記録の保存、資産凍結等の措置に係る確認、疑わしい取引の届出等のマネロン・テロ資金供与対策に関する法令上の措置について、適時適切に対応できる行内態勢を整備します。

4. お客さま情報整備および対応方針

当行は、お客さまとの取引に際して、当該お客さまにかかる基本的な情報を適切に調査し、お客さまの属性に即した措置を実施する行内態勢を整備します。さらにお客さまとの取引記録を定期的に調査・分析することにより、講ずべきリスク低減措置を判断・実施します。

5. 取引モニタリング・フィルタリング

当行は、営業店等からの報告、またはシステムによる異常取引や制裁対象取引の検知等を通じて取引状況を調査・分析することにより、講ずべきリスク低減措置を判断・実施します。

6. コルレス先の管理

当行は、コルレス先について十分な情報収集に努め、その評価を適切に行い、リスクに応じた適切な措置を実施します。また、営業実態のない架空銀行（シェルバンク）との関係は遮断します。

7. 役職員の育成

当行は、全役職員向けの研修等を継続的に実施し、マネロン・テロ資金供与対策に関する理解を深めるとともに役職員の意識向上を図り、役割に応じた専門性・適合性等を有する職員の確保・育成に努めます。

8. 遵守状況の検証

当行は、マネロン・テロ資金供与対策に関する遵守状況を点検し、その点検結果を踏まえて継続的にマネロン・テロ資金供与リスク管理態勢の改善に努めます。

Policy on Anti-Money Laundering and Combating the Financing of Terrorism

The Chugoku Bank, Limited

The Chugoku Bank, Limited (hereinafter, the “Bank”) recognizes that measures for anti-money laundering and combating the financing of terrorism (hereinafter, “AML/CFT”) is a priority task required not only domestically but also from the rest of the global community. Based on this recognition, the Bank shall take the initiative in establishing the management system in which it shall execute agile and effective responses to ever-changing international situations and the risks facing the Bank, and set forth the following policy as a basis for execution of operations.

1. Management Policy

In order to execute agile and effective responses to changes in international situations, the Bank shall take proactive steps to establish and maintain the management system based on the concept of “risk-based approach,” in which it shall identify and assess its money laundering and the financing of terrorism (hereinafter, “ML/FT”) risks in a timely and appropriate manner and take mitigation measures that are proportionate to the risks.

2. Organizational Structure and Officer

The Bank shall define AML/CFT as one of its critical management agenda and shall clarify the internal roles and responsibilities for that purpose. The Bank shall appoint the officer in charge of the Compliance Department as the supervisory manager for AML/CFT. A dedicated division shall be newly established within the Compliance Department and shall act as the centralized function to ensure the execution of the measures.

3. Measures for AML/CFT under Laws and Regulations

The Bank shall establish an internal system capable of carrying out timely and appropriate measures for AML/CFT under laws and regulations, including, but not limited to, verification at the time of transaction, retention of transaction records, confirmation of sanctions including freezing of assets, and notification of suspicious transactions.

4. Administration of Customer Information and Policy for Handling Customers

The Bank shall establish an internal system for making appropriate investigations about the basic information of customers in the course of the transactions with them and for carrying out measures that are proportionate to their attributes. Furthermore, the Bank shall determine and carry out required risk mitigation measures by way of making periodic investigations and analyses on the history of transactions with customers.

5. Transaction Monitoring and Screening

The Bank shall determine and carry out required risk mitigation measures by way of investigating and analyzing the status of transactions by the use of reports submitted by its branches or detection made by its computer systems for any unusual transactions or transactions subject to sanctions.

6. Management of Correspondent Banks

The Bank shall endeavor to collect sufficient information about its correspondent banks, conduct an appropriate assessment on them, and carry out appropriate measures that are proportionate to the risks involved. No relationship shall be established or maintained with any shell banks without a physical presence or operations.

7. Development Training of Directors and Employees

The Bank shall continually conduct training or other programs for all of its Directors and employees to deepen their understanding and raise their awareness of AML/CFT, in an effort to develop and retain human resources having expertise and fitness for the given roles.

8. Verification of Status of Compliance

The Bank shall inspect the status of compliance with regard to AML/CFT, and based on the results of such inspections, shall continually make efforts to improve its risk management system against ML/FT.