

## THE FINANCIAL INTELLIGENCE CENTRE ACT (No. 46 of 2010)

### SECURITIES AND EXCHANGE COMMISSION DIRECTIVES ON ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM OR PROLIFERATION, 2017

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### SECURITIES AND EXCHANGE COMMISSION DIRECTIVES ON ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM OR PROLIFERATION, 2017

**IN EXERCISE** of the powers contained in subsection four of section *thirty-six* of the Financial Intelligence Centre Act Number 46 of 2010, and in consultation with the Centre, the following Directives are hereby made:

#### PART 1 PRELIMINARY

Short title	1. These Directives may be cited as the Securities and Exchange Commission Directives on Anti-Money Laundering and Countering the Financing of Terrorism or Proliferation, 2017.
Interpretation	2. In these Directives, unless the context otherwise requires,
No. 46 of 2010	“Act” means the Financial Intelligence Centre Act;
	“attempted transaction” means an intention by a customer to conduct a transaction and the customer actually took some form of action towards the transaction and includes entering into negotiations or discussions to conduct the transaction and involves concrete measures to be taken by the customer but does not include a simple request for information, such as an enquiry as to the fee applicable to a certain transaction;
No. 46 of 2010	“Centre” has the meaning assigned to it in the Act;
	“Commission” means the Securities and Exchange Commission;
	“compliance officer” means an officer designated as such pursuant to section 23 of the Act;
No. 46 of 2010	“customer” means a person who has entered into a business relationship or in a single transaction with a reporting entity;
	“financing of terrorism” has the meaning assigned to it under Anti-Terrorism Act;
No. 21 of 2007	“manager” means an officer of a reporting entity who is in a position to control, direct, or influence decision-making;
	“money laundering” has the meaning assigned to it under the Prohibition and Prevention of Money Laundering Act, as
No. 14 of 2001	

	amended by Act No.44 of 2010;
No. 46 of 2010	<p>“proliferation” has the meaning assigned to it under the Act as amended by Act No.4 of 2016;</p> <p>“property” includes money and all other property, real or personal, movable or immovable including things in action and other intangible or incorporeal property wherever situated and includes any interest in such property;</p>
No. 41 of 2016	<p>“reporting entity” means an institution licensed or supervised by the Commission in accordance with the Securities Act;</p> <p>“suspicious transaction” means a transaction which is inconsistent with a customer’s known legitimate business or personal activities or with the normal business for the type of securities account which the customer holds, and includes, but is not limited to, the activities listed in the First Schedule hereto;</p> <p>“suspicious transaction report” means a report submitted on suspected money laundering, financing of terrorism or proliferation or other serious offence or attempted money laundering, financing of terrorism or proliferation other serious offence, whether in form of a data message or otherwise;and</p> <p>“transaction” means a purchase, sale, loan, pledge, gift, transfer, delivery or other disposition, or arrangement thereof, and includes –</p> <ul style="list-style-type: none"> <li>(a) opening of an account;</li> <li>(b) any deposit, withdrawal, exchange or transfer of funds in any currency whether in cash or by cheque, payment order or other instrument or by electronic or other non-physical means;</li> <li>(c) the sale, purchase or transfer of securities;</li> <li>(d) entering into any fiduciary relationship;</li> <li>(e) any payment made or received in satisfaction, in whole or in part, of any contractual or other legal obligation;</li> <li>(f) any payment made in respect of a lottery, bet or other game of chance;</li> <li>(g) establishing or creating a legal person or legal arrangement;</li> <li>(h) entering into a transaction involving real property; or</li> <li>(i) such other transaction as may be prescribed by the Minister, by statutory instrument as being a transaction.</li> </ul>

- Application
3. These Directives shall apply to all reporting entities licensed, registered, authorised or recognised by the Securities and Exchange Commission.

## PART II

### AUTHORITY OF THE SECURITIES AND EXCHANGE COMMISSION

- Authority of the Securities and Exchange Commission
4. The Securities and Exchange Commission shall be the supervisory authority for the purposes of giving effect to these Directives.

## PART III

### REPORTING OBLIGATIONS

- Obligation to report suspicious transaction
5. (1) Where a reporting entity processes a transaction to which there is reasonable grounds to suspect that any property is the proceeds of crime, or is related to, or is to be used for, terrorism, terrorist acts or by terrorist organisations or persons who finance terrorism or proliferation, the reporting entity shall take reasonable measures to ascertain the purpose of that transaction and submit a report to the Centre, setting out the suspicion, within three (3) working days of forming that suspicion in the Form set out in the Second Schedule hereto.

(2) A reporting entity shall exercise caution when carrying out a transaction which it suspects to be related to money laundering or financing of terrorism or proliferation.

(3) A reporting entity shall submit a suspicious transactions report on attempted money laundering or financing of terrorism or proliferation to the Centre in accordance with paragraph (1) of Directive 5.

- Obligation to report currency transaction
6. A reporting entity shall report, to the Centre, any currency transaction that is above the prescribed limit or kwacha equivalent of ten thousand United States Dollars, whether denominated in Zambia Kwacha or foreign currency and whether the transaction is conducted as one transaction or as a series of transactions that appear to be linked.

- Obligations of compliance officer
7. (1) A compliance officer shall:
- (a) keep a register of all reports made by employees of the

reporting entity and of all reports that the officer makes to the Centre;

- (b) on written request by a law enforcement agency,
  - (i) give an acknowledgment receipt from the Centre of all the reports submitted to the Centre; and
  - (ii) make available to the law enforcement agency copies of reports made to the Centre and those made to the compliance officer by employees of the reporting entity; and
- (c) after receiving a report in terms of Directive 7, promptly evaluate whether or not there are reasonable grounds for believing that a customer has been engaging in illegal activities or crime or financing of terrorism or proliferation, and if after such evaluation, the compliance officer finds that such grounds exist, the compliance officer shall immediately submit a suspicious transactions report to the Centre in the Form set out in the Second Schedule hereto.

(2) If a compliance officer resigns from a reporting entity, the reporting entity shall prepare and deliver to the Securities and Exchange Commission and the Centre, within ten days after delivery to the reporting entity of the compliance officer's resignation, a written statement of the reasons for the resignation.

(3) If a reporting entity terminates the appointment of its compliance officer, the reporting entity shall prepare and deliver to the Securities and Exchange Commission and the Centre, within ten days of the decision to terminate the appointment, a written statement of the reasons for the termination.

Obligations of  
employees

8. An employee of a reporting entity shall promptly report to a compliance officer all cases where:

- (a) the employee becomes aware, has knowledge or suspects or has reasonable grounds to suspect, that a customer has been or is involved in an illegal activity or crime or financing of terrorism or proliferation; or
- (b) a customer in respect of whom the employee becomes aware,

has knowledge or suspects or has reasonable grounds to suspect, that another customer has been engaging in illegal activities or crime or financing of terrorism or proliferation.

Cooperation with law enforcement agency

9.(1) In addition to reporting a suspicious transaction report to the Centre, a reporting entity shall not be precluded from providing information to a law enforcement agency where a transaction requires immediate action.

(2) A reporting entity shall:

- (a) cooperate with the law enforcement agencies to facilitate the exchange of information relating to money laundering or financing of terrorism or proliferation; and
- (b) comply with any law which requires the provision of information to the law enforcement agencies to assist in an investigation.

Obligations of board of reporting entity

10. (1) The board of a reporting entity shall ensure that the reporting entity puts in place internal programmes to prevent, detect and report any suspicious activities relating to money laundering, financing of terrorism or proliferation.

(2) The board shall submit an annual compliance report to the Securities and Exchange Commission indicating the number of internal reports submitted to the Centre on money laundering, financing of terrorism or proliferation and on the effectiveness of the internal programmes referred to in paragraph (1) of Directive 10.

Prohibition against tipping off

11. A reporting entity or any director, manager, officer, principal or employee of the reporting entity shall not disclose to any person the contents of a suspicious transactions report.

Protection of identity of persons and information relating to suspicious transaction Reports

12. (1) A reporting entity or any director, manager, officer, principal or employee of the reporting entity shall not disclose any information that identifies, or is likely to identify the person who prepared or made a suspicious transaction report, or handled the underlying transaction.

(2) A reporting entity or any director, manager, officer, principal or employee of the reporting entity shall keep confidential the contents of a suspicious transaction report.

Immunity of  
entities/persons  
reporting

13. A reporting entity or any director, manager, officer, principal or employee of the reporting entity who submits a suspicious transactions report to the Centre, in good faith, or in compliance with directions given by the Act or these Directives shall not be liable to any civil, criminal, administrative or disciplinary proceedings for breach of banking or professional secrecy or contract.

Obligations relating to  
financing of terrorism or  
proliferation

14. (1) A reporting entity shall develop practices and procedures that will help to detect and deter transactions that may involve funds used in the financing of terrorism or proliferation.

(2) Where such transactions are identified, a reporting entity shall submit a suspicious transaction report to the Centre in the Form set out in the Second Schedule hereto.

#### **PART IV SANCTIONS**

Penalties on reporting,  
internal controls and  
unauthorized  
disclosures

15. (1) A person who intentionally or negligently fails to submit a suspicious transaction report or currency report to the Centre commits an offence and is liable upon conviction, to a fine not exceeding seven hundred thousand penalty units or to imprisonment for a period not exceeding seven years, or to both.

(2) A reporting entity which fails to put in place internal control programmes for the prevention of money laundering or financing of terrorism or proliferation commits an offence and is liable upon conviction, to a fine not exceeding five hundred thousand penalty units or to imprisonment for a period not exceeding five years, or to both.

(3) Any person who intentionally and negligently discloses information to a customer or a third-party contrary to these Directives commits an offence and is liable upon conviction, to a fine not exceeding five hundred thousand penalty units or to imprisonment for a period not exceeding five years, or to both.

General penalty

16. A person who –

(a) intentionally or negligently fails to submit a suspicious transaction report on money laundering and financing of terrorism or proliferation to the Centre; or

(b) contravenes any provision of these Directives for which no specific penalty is prescribed;



is liable to an administrative sanction imposed under Directive 17.

Administrative  
sanctions

17. The administrative sanctions that the Securities and Exchange Commission may impose include the following:
  - (a) a public or private censure or reprimand not to repeat the conduct which led to the non-compliance with a provision of the Act or these Directives;
  - (b) A directive to take remedial actions or make specific arrangements to redress identified non-compliance;
  - (c) A restriction or suspension of certain specified business activities;
  - (d) where a fine is provided for an offence, an amount of money not exceeding fifty percent of the maximum of the fine; or
  - (e) where no penalty is provided for an offence, an amount of money to be determined by the Commission but not exceeding seven hundred thousand penalty units.

### PART III GENERAL

18. The Securities and Exchange Commission Anti-Money Laundering Directives, 2009 are hereby repealed.

Repeal and replacement  
of SEC Anti-Money  
Laundering Directives,  
2009.

19. These Directives shall come into force on such day as the Securities and Exchange Commission shall prescribe.

Directives to come into  
force

### FIRST SCHEDULE *Examples of suspicious activities*

#### 1. Suspicious Customer Behaviour



- (a) display of unusual or excessively nervous behaviour by the customer when conducting a transaction with a reporting entity;
- (b) conduct by customer coercing the reporting entity to hide or destroy records pertaining to the customer's transactions with intent to permanently avoid such records to be accessed by any third party;
- (c) issuing threats by the customer to an employee of a reporting entity and any other acts of intimidation by the customer aimed at ensuring that the employee does not disclose any adverse information about such customer's transactions or records;
- (d) customer abandoning a transaction after being informed by the reporting entity that the transaction is being investigated;
- (e) customer suggesting or offering a bribe to an employee of a reporting entity with the aim that such employee does not any adverse information about the customer's transaction;
- (f) customer appears to have a hidden agenda or behaves abnormally;
- (g) attempt by customer to apply for a securities contract outside the customer's jurisdiction which is comparable to the reporting entity's contract and where the reporting entity reasonably suspects that there are no justifiable reasons for the customer's failure to enter into a contract within the customer's jurisdiction;
- (h) customer being introduced by an intermediary from jurisdictions susceptible to corruption, money laundering, financing of terrorism and which jurisdictions display a lack of adequate anti-money laundering standards;
- (i) the customer accepts very unfavourable conditions unrelated to current market transaction values or prices;
- (j) customer requests a securities transaction or product with questionable purpose and which the customer is not willing to divulge or clarify the reason for the investment to any employee of the reporting entity;
- (k) resistance by customer to provide information related to their identity, source of funds or the intended use of the contract and where such customer displays the preference to have the contract terminated early upon fulfilment of a particular transaction;
- (l) attempts to make a wire transfer by the customer above the authorised limit under relevant laws of the country or the customer's persistent desire to receive payment in a foreign currency in instances where the reporting entity has advised that the local currency is the most appropriate;
- (m) a customer establishes a large investment portfolio and within a short time period liquidates the investment and requests the return of the cash value payable to a third party;
- (n) customer attempting to borrow the maximum cash value of his or her investment soon after paying for the securities; or

- (o) customer instructs a reporting entity to assign a refund of the securities transaction to a person who is not a beneficiary under the transaction.

## **2. Suspicious Customer Identification Circumstances**

- (a) Customer claims to be a law enforcement agent conducting an undercover operation when there are no valid indications to support that;
- (b) Customer furnishes unusual or suspicious identification documents and is unwilling to provide personal background information;
- (c) Customer is unwilling to provide personal background information when it is requested;
- (d) Customer's permanent address is outside Zambia;
- (e) Where the reporting entity with due diligence, discovers that the customer's home or business telephone provided by the customer does not exist;
- (f) Customer is reluctant to reveal details about the business activities or to provide financial statements or documents about a related business entity; or
- (g) Customer is reluctant to provide normal information when applying for a securities contract or transaction;
- (h) Customer provides minimal or fictitious information or provides information that is difficult or expensive for the institution to verify; or
- (i) Customer refuses, delays or fails to provide information to enable verification to be completed.

## **3. Suspicious Transactions**

- (a) Customer's financial statement makes representations that do not conform to generally accepted accounting principles;
- (b) customer makes large fund flows through non-resident accounts with brokerage firms;
- (c) customer makes a transaction with an undisclosed party;
- (d) customer makes an early termination of a securities product, especially at a loss, or where cash was tendered and/or the refund cheque is to a third party;
- (e) customer makes a transfer of the benefit of a product to an apparently unrelated third party;
- (f) the applicant for securities business purchases securities in amounts considered beyond the customer's apparent means;
- (g) the applicant for securities business appears to have investment portfolios with several institutions;
- (h) the applicant for securities business attempts to use cash to complete a proposed transaction when this type of business transaction would normally be handled by cheques or other payment instruments;

- (i) the customer conducts a transaction that results in a conspicuous increase of investment contributions;
- (j) customer attempts to use a third-party cheque to make a proposed purchase of securities;
- (k) customer requests for a large purchase of securities under a lump sum contract where the client has usually made small, regular payments;
- (l) customer takes out investment contracts with instalments that exceed the customer's apparent means;
- (m) the transaction involves cross border payment (wire transfers), the first (or single) instalment being paid from a bank;
- (n) Customers settlements are paid from accounts outside the country;
- (o) Customer takes out investment vehicles with values that appear to be inconsistent with the customer's investment preferences;
- (p) Customer makes a pre-payment of investment contract instalments;
- (q) Customer makes a substitution, during the life of an investment contract, of the ultimate beneficiary with a person without any apparent connection with the shareholder; or
- (r) Customer makes a change of the designated beneficiaries (especially if this can be achieved without knowledge or consent of the securities dealer and/or the right to payment could be transferred simply by signing an endorsement on the contract).

#### **4. Suspicious Trade Financing Transactions**

- (a) Customer seeks trade financing on the export or import of commodities whose stated prices are substantially more or less than those in a similar market situation;
- (b) Customer makes changes to a letter of credit beneficiary just before payment is to be made; or
- (c) Customer changes the place of payment in a letter of credit to an accountant in a country other than the beneficiary's stated location.

#### **5. Miscellaneous Suspicious Customer Activity**

- (a) An agent, attorney or financial advisor acts for another person without proper documentation such as a power of attorney.

#### **6. Suspicious Employee Activity**

- (a) Employee exaggerates the credentials, background or financial ability and resources of a customer in written reports the reporting entity requires;
- (b) Employee is frequently involved in unresolved exceptions or recurring exceptions on exception reports;

- (c) Employee lives a lavish lifestyle that cannot be supported by his or her salary;
- (d) Employee frequently overrides internal controls or established approval authority or circumvents policy;
- (e) Employee uses company resources to further private interests;
- (f) Employee assists transactions where the identity of the ultimate beneficiary or counter party is undisclosed; or
- (g) Employee avoids taking vacations.

**SECOND SCHEDULE**  
**SUSPICIOUS TRANSACTION REPORT**  
**(Directive 5(1))**

# INSTRUCTIONS:

1. Complete as much of this form as possible.
2. Fields marked with an asterisk (\*) are mandatory, except for attempted transactions.
3. Please complete form in INK and CAPITAL LETTERS.
4. Mark appropriate boxes with a cross (X). For further information on how to complete this form please refer to the STR Guidelines.
5. For electronic submission please log on to our website at [www.fic.zm](http://www.fic.zm)

## Send the Completed form to:

The Director-General  
Financial Intelligence Centre  
P.O. Box 30481, Lusaka, Zambia  
or  
Email [FICSTR@fic.gov.zm](mailto:FICSTR@fic.gov.zm)

All Suspicious Transaction Reports (STRs) must, when completed, be treated as confidential.

## PART A: DETAILS OF THE PERSON/ORGANISATION TO WHICH THE SUSPICIOUS MATTER RELATES

### I. ACCOUNT OWNER(S)/HOLDER(S) – INDIVIDUAL

1. Surname: .....
2. First Name: .....
3. Maiden Name: .....
4. Other Names: .....
5. Marital Status: .....
6. Date of Birth: (DD/MM/YYYY) ..... / ..... / .....
7. Sex: ☐ F ☐ M
8. Profession: .....
9. Occupation: .....
10. Nationality: .....
11. Identity Type: ☐ National Registration Card ☐ ssport ☐ ver's Licence
  - (a) Identification Number: .....
  - (b) Date of issue: .....
  - (c) Place of Issue: .....
  - (d) Identification issued by:.....
12. Residential Address\* .....
  - (a) Property Number: .....
  - (b) Street Name: .....
  - (c) Area: .....
  - (d) Village: .....
  - (e) Chief: .....
  - (f) District: .....
  - (g) Province: .....
  - (h) Country: .....
13. Postal Address\* .....

14. Business Address:

- (a) Property Number: .....  
 (b) Street Name: .....  
 (c) Area: .....  
 (d) District: .....  
 (e) Province: .....

15. Contact Details

- (a) Telephone: .....  
 (b) Mobile: .....  
 (c) Fax: .....

If more than one person is involved, please provide the same details in this Part for each person, where appropriate, and attach.

## II. ACCOUNT OWNER(S)/HOLDER(S) - BUSINESS ENTITY

1. Name\* .....  
 2. Date of Registration\* (MM/DD/YYYY) ..... / ..... / .....  
 3. Registration Number\* .....  
 4. Country of Registration\* .....  
 5. Type of Business\* .....

- |                              |                |                              |             |
|------------------------------|----------------|------------------------------|-------------|
| (a) <input type="checkbox"/> | Company        | (e) <input type="checkbox"/> | Sole trader |
| (b) <input type="checkbox"/> | Partnership    | (f) <input type="checkbox"/> | Cooperative |
| (c) <input type="checkbox"/> | Statutory Body | (g) <input type="checkbox"/> | Society     |
| (d) <input type="checkbox"/> | Trust          | (h) <input type="checkbox"/> | Other       |

6. Nature of Business\* .....

7. Business Address (Head Office):

- (a) Property Number: .....  
 (b) Street Name: .....  
 (c) Area: .....  
 (d) Village: .....  
 (e) Chief: .....  
 (f) District: .....  
 (g) Province: .....  
 (h) Country: .....

8. Postal Address\*.....

9. Contact details .....

- (a) Telephone: .....  
 (b) Mobile: .....  
 (c) Fax/Landline: .....  
 (d) Email: .....  
 (e) Website: .....

## PARTICULARS OF DIRECTORS/TRUSTEES/SETTLERS/BENEFICIARY

- (a) Surname: .....  
 (b) First Name: .....

- (c) Maiden Name: .....  
 (d) Marital Status: .....  
 (e) Nationality: .....  
 (f) Occupation: .....  
 (g) Identity Type and Number: .....  
 (h) Date of issue: .....  
 (i) Place of Issue: .....  
 (j) Residential Address: .....  
 11. Contact details:  
 (a) Mobile: .....  
 (b) Landline: .....  
 (c) Fax: .....  
 (d) e-mail: .....

**PARTICULARS OF PERSON WITH AUTHORITY TO CONDUCT TRANSACTION ON BEHALF OF BUSINESS ENTITY/ TRUST**

12. Surname: .....  
 13. First Name: .....  
 14. Maiden Name: .....  
 15. Other Names: .....  
 16. Marital Status: .....  
 17. Date of Birth: (DD/MM/YYYY) ..... / .... / .....  
 18. Sex: ☐ F ☐ M  
 19. Profession: .....  
 20. Occupation: .....  
 21. Nationality: .....  
 22. Identity Type: ☐ National Registration Card ☐ passport ☐ Driver's Licence  
 (e) Identification Number: .....  
 (f) Date of issue: .....  
 (g) Place of Issue: .....  
 (h) Identification issued by: .....  
 Contact details  
 (a) Mobile: .....  
 (b) Landline: .....  
 (c) Fax: .....  
 (d) e-mail: .....

**PARTICULARS OF PERSON WITH AUTHORITY TO MANAGE, VARY OR CONTROL THE MANAGEMENT OF THE ENTITY/TRUST**

23. Surname: .....  
 24. First Name: .....  
 25. Maiden Name: .....  
 26. Other Names: .....  
 27. Marital Status: .....  
 28. Date of Birth: (DD/MM/YYYY) ..... / .... / .....  
☐ ☐



29. Sex: F M
30. Profession: .....
31. Occupation: .....
32. Nationality: .....
33. Identity Type: National Registration Card ☐ Passport ☐ Driver's Licence ☐
- (i) Identification Number: .....
- (j) Date of issue: .....
- (k) Place of Issue: .....
- (l) Identification issued by: .....
- Contact details:
- (a) Mobile: .....
- (b) Landline: .....
- (c) Fax: .....
- (d) e-mail: .....

## PART B: ACCOUNT DETAILS

25. Account Number)\* .....
27. Branch/Office .....
28. Date account opened\* DD/MM/YYYY ..... / ..... / .....
29. Date account closed DD/MM/YYYYD ..... / ..... / .....
30. Other accounts held by this customer: .....
31. Details of person who closed account: .....
32. Status of account: .....
33. Account/Product type\*
- |   |   |
|---|---|
| <input type="checkbox"/> Accounting Services  | <input type="checkbox"/> Insurance              |
| <input type="checkbox"/> Advisory Services    | <input type="checkbox"/> Investment             |
| <input type="checkbox"/> Auditing Trust       | <input type="checkbox"/> Lease/Hire purchase    |
| <input type="checkbox"/> Betting              | <input type="checkbox"/> Conveyance of Property |
| <input type="checkbox"/> Bullion              | <input type="checkbox"/> Remittance             |
| <input type="checkbox"/> Credit/Debit Card    | <input type="checkbox"/> Stored value card      |
| <input type="checkbox"/> Credit Facilities    | <input type="checkbox"/> Superannuation         |
| <input type="checkbox"/> Custodial            | <input type="checkbox"/> Trading                |
| <input type="checkbox"/> Demand/Cheque/Saving | <input type="checkbox"/> Other                  |
| <input type="checkbox"/> Foreign Currency     |   |

## PART C: TRANSACTION DETAILS

34. Purpose of transaction	45. Transaction Type*	46. Purchase of
35. parties to transaction	Account Opening	Negotiable Instrument
36. Place of transaction* .....	Account Depositing	Disposal of Instruments
37. Date of Transaction *DD/MM/YYYY	Account Withdrawal	Contribution

38. Time of transaction HH:MM	Traveller'scheques	Premium
39. State period over which transaction conducted	Funds Transfer	Bet Placed
40. Total amount of transaction (ZMK)*.....		
41. Assets involved, Currency Amount, value and type (Specify).....	Transfer of Property	Remittance
42. Method of transaction.....		
43. Method of disposal of funds or property.....	Other (specify)	
44. Amount of disposition of funds or assets.....		
47. Any previous activity in the preceding 180 days which had been considered for reporting in connection with the account, whether the activity was reported or not.		
48. The report number of any previous reports made in connection with the account		

#### PART D: CATEGORY FOR SUSPICION

##### REASON FOR SUSPICION (Tick at least one)

- |   |                                     |
|---|-------------------------------------|
| Person - Suspicious Behaviour                       | ATM fraud                           |
| Irregular or unusual international banking activity | Advance fee Scam                    |
| Large or unusual cash deposit                       | Large or unusual cash withdrawals   |
| Activity inconsistent with customer profile         | Corporate/Investment fraud          |
| Large or unusual inward remittance                  | Large or unusual outward remittance |
| Unusually large foreign currency transaction        | Credit Card fraud                   |
| Country/jurisdiction risk                           | Credit/loan facility fraud          |
| False name/identity                                 | Currency not declared at border     |
| Counterfeit currency                                | Immigration related issue           |
| Fraud   | Internet fraud                      |
| Avoiding reporting obligations                      | National Security concern           |
| Known/suspected criminal/organization               | Unauthorised Transaction            |
| Unusual business practices                          | Unusual Financial Instrument        |
| Many third parties making deposits into the account | Unusual Gambling                    |
| Watch listed individual/organization                | Other (Specify):                    |
| Phishing (Electronic Fraud)                         | (Attach extra leaf if necessary)    |
| Inactive account                                    |                                     |

## DESCRIPTION OF TRANSACTION

### Transaction Narrative\*

Please describe clearly and completely the factors or unusual circumstances that led to the suspicion. Further, indicate whether the transaction is an isolated incident or involves other transactions. Provide as much details as possible to explain what was suspicious. Has this matter been reported to any Law Enforcement Agency? If yes, please specify. If there is insufficient space, attach extra leaf.

Indicate what action the natural or legal person making the report, or other entity on whose behalf the report is made, has taken in connection with the transaction concerning which the report is made. Indicate what documentary proof, if any, is available in respect of the transaction concerning which the report is made.

## PART E: REPORTING ENTITY DETAILS\*

### NATURE OF BUSINESS

Micro Finance Institution	Insurance Broker	Lotteries
Motor Vehicle Dealer	Precious metal Dealer	Leasing Company
Bureau de Change	Real Estate Agent	Legal Practitioner
Insurance	Building Society	Money Remitter
Real Estate Dev.	Accountant/Auditor	Pension
Commercial Bank	Casino	Stock Broker
Tax Consultant	Development Finance	Other (Specify)

Reporting Entity Name\* .....  
 Physical Address .....  
 Compliance/Reporting Officer Name .....  
 Position .....  
 Tel No.:  
 Landline: +260.....  
 Mobile: +260.....  
 Fax: +260.....  
 Email Address:.....

### If different from Compliance /Reporting Officer

Name: .....  
 Position: .....  
 Tel No.:  
 Landline: +260.....  
 Mobile: +260.....  
 Fax: +260.....  
 Email Address:.....

Are there any attachments accompanying this form? Yes No  
 (If yes, please specify):

Date: MM/DD/YYYY \_\_\_\_/\_\_\_\_/\_\_\_\_

.....  
Signature

.....  
Compliance Officer Signature\*

Please submit completed STR to FIC not later than three working days of forming the suspicion

**FOR OFFICIAL USE ONLY**

STR NO:

DATE RECEIVED:

NAME:

(Signature) \_\_\_\_\_

*Authorised Officer*

These Directives have been made in consultation with the Centre pursuant to subsection four of section *thirty-six* of the Financial Intelligence Centre Act, No. 46 of 2010.

Signed by:



.....  
**Phillip K. Chitalu**

**Chief Executive Officer**

**SECURITIES AND EXCHANGE COMMISSION**