

# Thailand AML Validation Requirement

## Frequently Asked Questions

The FAQs below will help answer some common questions you may have about Thailand regulatory requirements AML validation on account authorizers.

### 1. What are the legal base of requirements

#### **Notification of the Bank of Thailand No. SorNorSor. 77/2008 re: Guideline on undertaking Deposit or Accepting Money from Public:**

"Financial institutions shall require depositors to submit identification documents or copies of such documents with signature, certifying as true copies, as evidence"

"Depositor means natural person or juristic person who is related to or conducts transaction with the financial institutions, or is the ultimate beneficiary of the relationship or transactions, or who has control or make decision, as well as the person who is assigned or authorized to proceed in keeping relationship or transaction with financial institutions or on behalf of other person"

"A commercial bank shall verify the identification documents or copies of those documents mentioned in Article 4 according to a normal practice with honesty and meticulously."

**Notification of the Prime Minister Office Re: Identification of Customers of Financial Institutions and Professionals under Section 16** requiring the following information and evidence of the signatories authorized to act on behalf of the juristic person authorized to create a business relationship or conduct transactions and persons who have been granted final authority to create a business relationship or to conduct a transaction, if any.

- (i) Full name.
- (ii) Date, month, year of birth.
- (iii) National identification number and, in the case of a foreign national, a passport number, an identification number issued by the government or a government agency of the person's citizenship, or an identification number in personal identification documents issued by the Thai government, if any, must be shown.
- (iv) Address listed in the person's household registration and the person's current address in cases where the person does not reside at the address listed in the household registration. Furthermore, in case of a foreign national, the person's address in the country of citizenship and current address in Thailand must also be shown.

### 2. Who are defined as AML users that are required to be validated against the personal identity document? (Identity card or Passport)

Authorizers or the last person in the authorization flow i.e Verifier (if there's no authorizer is set up in the authorization flow) are considered as the Authorizer who approve to process on-line transactions via Citi electronic system – CitiDirect. They are defined as AML users.

The following are some of the most common entitlements that may trigger

Thailand AML requirements.

(a) Authorizer of:

- (i) Payments
- (ii) Payment Services
- (iii) Direct Debit
- (vi) File Import Transactions

(b) Verifier of Payments if there is no Authorizer in the authorization flow

(c) Maker/ Inputters of transactions if there is no Verifier and Authorizer in the authorization flow

(d) File Runner if there is no File Authorizer in the authorization flow

The CitiDirect system may determine that ID is required for a File user if they can upload files with transactions relating TH account where there is no further approval process for the payments in the File. This will be the case even if that user does not specifically have access to transact on the TH account. If the user does not need to transact on Thailand account(s), please disregard this requirement; The User's ability to complete transactions on Thailand account(s) will be revoked by the below mentioned date. There's no impact to user's other functions in CitiDirect.

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| <p>3. <b>Does the regulation include e-authorizers from a 3<sup>rd</sup> party company?</b></p> | <p>Yes. The regulation governs all authorizers for payment from Thailand account(s) including authorizers from 3<sup>rd</sup> party company.</p> |
| <p>4. <b>Do the regulation impact existing AML users?</b></p>                                   | <p>Yes. Commercial bank is required to obtain identification card or passport (for foreigners only) of AML users.</p>                            |
| <p>5. <b>What is the deadline to be non-compliant with the requirement</b></p>                  | <p><b>Extended to 28<sup>th</sup> Feb 2017</b></p>   |
| <p>6. <b>How will the users be affected?</b></p>  | <p><u>For control purpose, following changes to the user entitlement process will be applied:</u></p>  |

All new entitled AML Users after May 14<sup>th</sup> 2016 should be activated by Citibank Thailand after the bank validates the user against user's identity document. Only users that pass the validation will be activated in CitiDirect. Before activation, user will not be allowed to operate in CitiDirect with the function entitled.

Existing AML users as of May 14<sup>th</sup> 2016 are continuously allowed to operate in CitiDirect as BAU until **28<sup>th</sup> Feb 2017**; After that date, If AML users do not submit their Identity document to Citibank Thailand for validation or if the validation is failed the users will be blocked from entitled functions.

**7. Are there exemptions to this ID Verification requirement and / or designation? What are the Exemption Criteria?**

No exemption.

**8. What would be considered as an acceptable ID document?**

Certified True Copy of ID Card or Passport

The ID Card / Passport should have good value date at the time of receipt by Citi for validation.

Address:

Thai person:

- Residential address and mailing / contact address;

Foreigner (Registered Resident):

- Collect the City and Country of the signatory from the Passport; and
- Current residential address in Thailand

Foreigner (Non Resident):

- Collect the City and Country of the signatory from the Passport; and
- Current residential address outside of Thailand ; or
- Company address where Authorised Signer is located.

Note: Mailing address may obtain from utility bill or any other document that contains the mailing address.

**9. Who can certify these identification documents and what information is required**

The copy of identification documents can be certified as true copy by ID Card for Thai/ Passport owner for a foreigner;

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| <p>from the certifier?</p>   | <p>The document owner signs on the copy of the identification document for true copy certification.</p>  |
| <p>10. What if the user's name on the CitiDirect BE form is different from the name on the personal identification document?</p>   | <p>This will not be considered as valid identification per AML/BOT regulations.</p>  |
| <p>11. Where should the personal identification be sent to?</p>  | <p>Account Service Unit, Citibank, N.A. Bangkok Branch</p> <p>18th Floor, 399 Sukhumvit Road, Interchange 21 Building, Klongtoey Nua Sub-District, Wattana District, Bangkok 10110, Thailand.</p>  |
| <p>12. Can Client submit a soft copy of these identification documents to speed up the process?</p>  | <p>No. Certified True copy of ID Card / Passport is required.</p>  |
| <p>13. Can the AML users submit the document directly to their local Citibank contacts or Citibank Thailand branch instead of via their Security Manager of the Account owner?</p> | <p>Yes. However, we recommend Security manager to consolidate all AML users' personal document and send to Citibank Thailand branch to save your courier cost and simplify consolidation. Once the documents are sent to Citibank ASU department in Thailand, please specify clearly the account name and number that user can access and operate for easier filling and reconciliation.</p> |
| <p>14. What's the turnaround time for validation?</p>  | <p>Aiming for 2 business days at most from the date that Citibank Thailand received the good quality of user's personal identity documents.</p>  |
| <p>15. How will Citi handle the ID documents? Are these documents returnable or available to share with another entity internally?</p>   | <p>Certified True copy of ID Card / Passport will be kept on file by local ASU team for regulatory purposes.</p> <p>Certified True copy of ID Card/Passport is required in original with wet signature of the owner (or the Notary office's stamp); Thus the Certified True copy of ID card/Passport cannot be shared among Citi branches of AML</p>   |

countries.

**16. Any contact points for assistance?**

Please contact your local CitiService for assistance.

For Thailand Clients: Thailand CitiService or ASU team can provide assistance at:

Phone number: +66 2 896 3000

Email address: [thailand.citiservice@citi.com](mailto:thailand.citiservice@citi.com)