



Butterfield Private Bank

Important Notice

Financial Action Task Force

Nine Special Recommendations on Terrorist Financing

Recommendation VII

Recognizing the vital importance of taking action to combat the financing of terrorism, the Financial Action Task Force (FATF) has set the basic framework to detect, prevent, and suppress the financing of terrorism and terrorist acts. FATF member states, and their financial institutions throughout the world, are obliged to provide certain information on the parties involved in payment orders.

Special Recommendation* VII (SR VII) on funds transfers, provides:-

Countries should take measures to require financial institutions, including money remitters, to include accurate and meaningful originator information (name, address and account number) on funds transfers and related messages that are sent, and the information should remain with the transfer or related message through the payment chain.

Countries should take measures to ensure that financial institutions, including money remitters, conduct enhanced scrutiny of and monitor for suspicious activity funds transfers which do not contain complete originator information (name, address and account number).

Currently, our regulators, The Central Bank of The Bahamas have proposed an amendment to the existing Financial Transactions Reporting Regulations, 2000, to ensure all licensees comply with SR VII.

As SR VII is now practiced widely among FATF member states, and other countries, the Bank has however, after due consideration, to ensure the least disruption to clients in remitting funds by wire transfers, has decided it will immediately comply with SR VII.

What does this mean?

For all cross border wire transfers, the following data will accompany the wire transfer:

1. Name of remitters account;
2. Address of remitter;
3. Account number of remitter

This notice also directly crosses with the Bank's responsibilities to have updated documentation for the verification of its customers, as required under section II (1) of the Financial Transactions Reporting Act, 2000. In this regard the Bank does have the right to refuse payment requests should clients refuse to provide current or adequate verification of identity.

Please do contact your Relationship Manager at our offices or (242) 393-8622, should any questions arise in this regard.

*To read more detail on all Special Recommendations of FATF, visit their website www.fatf.gafi.org

