

APPENDIX B: BDCB FINTECH REGULATORY SANDBOX APPLICATION FORM [AMENDED VIA AMENDMENT NO.1 DATED 9 DECEMBER 2020]

Section A: Applicant's Information

| section A. Applicant's informati | Oli |
|----------------------------------|-----|
| Organisation (Applicant) | |
| Product/Service Name | |
| Address | |
| Website | |
| Email | |
| Telephone | |
| Company Licence / Business | |
| Registration Number | |
| Contact Person | |
| Designation | |
| Email | |
| Telephone | |



Note -

- [a] Please note that the regulatory sandbox is meant to enable experimentation of <u>innovative</u> financial services/products <u>that are likely to be regulated by BDCB</u>.
- (b) Before submitting an application, you are <u>highly recommended</u> to contact <u>fintech@bdcb.gov.bn</u> to seek <u>specific</u> clarifications.
- (c) The completeness and clarity of the information provided in the application will determine the time taken for BDCB to review your sandbox application.

Section B: Details Required for the Sandbox Application

1. Please provide <u>full details</u> of your organisation, covering the following areas –

| No | Requirements | Supporting Information and/or |
|------|--|-------------------------------|
| • | | Attachments |
| i. | Profile of the organisation, including the | |
| | organisation structure, past achievements | |
| | and business profile with Registrar of | |
| | Companies and Business Names (ROCBN) | |
| | and/or other regulatory bodies of business | |
| | entities. | |
| ii. | Name(s) of directors (please include copies | |
| | of identification for each director). | |
| iii. | Name(s) of shareholders including | |
| | information on each shareholders | |
| | shareholding interest in the organisation | |
| | (please include copies of identification for | |
| | each shareholder). | |



| iv. | Total number of staff in Brunei Darussalam | |
|-------|---|--|
| | and total number of compliance personnel. | |
| V. | Profile of key personnel, including relevant | |
| | domain knowledge and experience. | |
| vi. | Financial standing, including any funding | |
| | raised and/or to be raised. | |
| vii. | Source of funding (if any) including the | |
| | amount of capital in place for the | |
| | organisation. | |
| viii. | Name of investor(s), proposed joint ventures, | |
| | etc. (if any). | |
| ix. | Authorised regulatory status (e.g. licensing, | |
| | registration, notification, approval, | |
| | recognition) under BDCB and/or other | |
| | regulators. | |

2. Please provide <u>accurate</u> and <u>complete</u> information covering the following –

Have you at any time been convicted of any felony or crime by any court of competent jurisdiction, including civil or military (excluding traffic offence) that relates to your honesty and/or integrity unless you subsequently have been restored to good standing?

☐ Yes ☐ No

If yes, please give full particulars of the court by which you were convicted, the offence and the penalty imposed and the date of conviction as well as evidence of having been restored to good standing.



| | □ Yes □ No |
|---|--|
| Have you been licensed, registered or approved | |
| under any law in any jurisdiction which requires | If yes, please list all applications showing |
| licensing, registration or approval in relation to any | whether they have been successful or |
| regulated activity? | unsuccessful. |
| | |
| | □ Yes □ No |
| Have you ever been refused the right or restricted | |
| in your right to carry on any trade, business or | If yes, please give full particulars of the |
| profession for which a specific licence, registration | action taken, where and when it took |
| or other authorisation is required by law in any | place and the identity of the party having |
| jurisdiction? | taken this action. |
| | |
| | ☐ Yes ☐ No |
| Have you contravened any financial services legislation or been the subject of any disciplinary proceedings, investigations and/or fines by a governmental, professional or other regulatory body or association? | If yes, please give full particulars of the action taken, where and when it took place and identity of the party having taken this action. |
| | ☐ Yes ☐ No |
| Have you been the subject of any adverse finding in a civil action by any court of competent jurisdiction, relating to fraud? | If yes, please give full particulars of the court by which you were convicted, the offence and the penalty imposed and the date of conviction. |



☐ Yes ☐ No Have you been the subject of any adverse finding If yes, please give full particulars of the in a civil action by any court of competent court by which you were convicted, the jurisdiction, relating to misfeasance or other offence and the penalty imposed and the misconduct in connection with the formation or date of conviction. management of a corporation or partnership? ☐ Yes ☐ No If yes, please give full particulars of the Has any body corporate, partnership or action taken, where and when it took unincorporated institution to which you have been place and identity of the party having associated with as a director, controller, manager taken this action. or company secretary contravened any financial services legislation or been the subject of any disciplinary proceedings, investigations and/or fines by a governmental, professional or other regulatory body or association? Have you been a director, partner, substantial ☐ Yes ☐ No shareholder or concerned in the management of a business that has gone into insolvency, liquidation If yes, please give full particulars of the or administration during the period when, or business, position, where and when it within a period of one year after, you were a took place. director, partner, substantial shareholder or



| concerned in the management of the business, | |
|---|---|
| whether in Brunei Darussalam or elsewhere? | |
| | |
| Have you been disqualified from acting as a director or disqualified from acting in any managerial capacity, whether in Brunei Darussalam or elsewhere? | ☐ Yes ☐ No If yes, please give full particulars of the action taken, where and when it took place. |
| Have you been adjudged bankrupt by a court? | ☐ Yes ☐ No If yes, please give full particulars of the action taken, where and when it took place and provide evidence that you have met your obligations in the last 10 years and have achieved economic accomplishments. |
| Have you been or are you unable to fulfill any of your financial obligations, whether in Brunei Darussalam or elsewhere? | ☐ Yes ☐ No If yes, please give full particulars of the action taken, where and when it took place and provide evidence that you have met your obligations in the last 10 years and have achieved economic accomplishments. |



| | ☐ Yes ☐ No |
|---|---|
| Have you been or are you subject to any | |
| judgment debt which is unsatisfied, either in whole | If yes, please give full particulars of the |
| or in part, whether in Brunei Darussalam or | action taken, where and when it took |
| elsewhere? | place. |
| | |

3. Please provide <u>full details</u> of the proposed financial service/product to be experimented in the sandbox, covering the following areas –

| No. | Requirements | Supporting Information and/or |
|------|---|-------------------------------|
| | | Attachments |
| i. | Please provide full details of the proposed | |
| | financial problem statements that the | |
| | proposed financial service/product aims to | |
| | address. | |
| ii. | Benefits of the proposed financial | |
| | service/product, in particular, those that may | |
| | not exist today. | |
| iii. | Business model(s), including the target | |
| | customers and specific use cases. For each | |
| | use case, provide an <u>end-to-end</u> illustration | |
| | on how the proposed financial | |
| | service/product will be made available, | |
| | including – | |



| | a. The interactions and money flows between | |
|-----|--|--|
| | you, your target customers and your business | |
| | partners (if any); | |
| | b. The entity that will be holding your | |
| | customers' monies; and | |
| | c. The remuneration structure. | |
| iv. | Technical architecture and solution, detailing | |
| | the specific technology and innovative ways | |
| | in which the technology will be applied. | |
| V. | Comparison with existing offerings (including | |
| | in Brunei Darussalam) that are similar to the | |
| | proposed financial service/product, focusing | |
| | on the problem statements, benefits, | |
| | technology and business model. | |
| vi. | The readiness of the prototype development, | |
| | including an estimated timeframe on the | |
| | readiness to provide an end-to-end | |
| | demonstration of the proposed financial | |
| | service/product to BDCB. | |

4. Please provide <u>full details</u> of the applicable legal/regulatory requirements and the relaxation that you are seeking in order to deliver the proposed financial service/product in the sandbox:

| No. | Requirements | Supporting Information and/or |
|-----|--------------|-------------------------------|
| | | Attachments |



| i. | State all the regulatory status (e.g. licensing, | |
|------|--|--|
| | registration, notification, approval, | |
| | recognition) required. | |
| ii. | Include a legal opinion, if available, from a | |
| | qualified legal practitioner applying the | |
| | relevant laws administered by BDCB to the | |
| | facts of your case. | |
| iii. | State the specific legal and regulatory | |
| | requirements that you are seeking BDCB to | |
| | relax for the duration of the sandbox, and why | |
| | SO. | |
| iv. | Describe how you intend to meet the full legal | |
| | and regulatory requirements before exiting | |
| | the sandbox. | |

5. Please provide <u>full details</u> of the proposed sandbox design, covering the following areas:

| No. | Requirements | Supporting Information and/or |
|-----|--|-------------------------------|
| | | Attachments |
| i. | Describe the experiments to be conducted in | |
| | the sandbox, including specific testing of the | |
| | application of technology in the proposed | |
| | financial service/product. | |
| ii. | For each experiment described in 4(i), | |
| | provide the indicator(s) and corresponding | |
| | value(s) that would be used to monitor and | |
| | assess the progress of the experiment. | |



| iii. | State and justify the sandbox boundaries, | |
|------|---|--|
| | including – | |
| | | |
| | a. Period of the sandbox (in months); | |
| | b. Limit on the type (e.g. retail, accredited) of | |
| | customers involved; | |
| | c. Limit on the number of customers involved; | |
| | d. Other quantifiable limits such as transaction | |
| | thresholds or cash holding limits; and | |
| | e. Quantification of the maximum loss and | |
| | impact, including any potential knock-on | |
| | effects. | |
| iv. | Based on 4(iii), describe the controls to be put | |
| | in place so as to manage risk and failure in the | |
| | sandbox, including – | |
| | a. money laundering & terrorism financing; | |
| | b. consumer/investor protection; | |
| | c. business risks; and | |
| | d. technology risks. | |
| V. | Describe the exit and transition plan for | |
| | customers in the sandbox as well as the | |
| | resolution plans and how the business would | |
| | be run off, in the event that the proposed | |
| | financial service/product has to be | |
| | discontinued. | |



6. Please provide <u>full details</u> on how the regulatory sandbox criteria below will be fulfilled:

| No. | Requirements | Supporting Information and/or |
|------|--|-------------------------------|
| | | Attachments |
| i. | The proposed financial service is innovative | |
| | (e.g. is new or emerging technology or uses | |
| | existing technology in an innovative way) and | |
| | there are no comparable offerings in Brunei | |
| | Darussalam, with clear potential to – | |
| | a. Improve accessibility, efficiency, security | |
| | and quality in the provision of financial | |
| | services; | |
| | b. Enhance the efficiency and effectiveness of | |
| | risk management; and/or | |
| | c. Lead to a better deal for consumer directly | |
| | or indirectly. | |
| ii. | The applicant has the intention as well as the | |
| | ability to deploy the proposed financial | |
| | service on a broader scale after exiting the | |
| | regulatory sandbox. | |
| iii. | Clear test scenarios and expected outcomes. | |
| iv. | Clear and appropriate parameters or | |
| | boundaries of the regulatory sandbox for the | |
| | protection of consumers as well as the safety | |
| | and soundness of the financial industry. | |



| V. | Identification, assessment and mitigation of | |
|-----|---|--|
| | the risks arising from the experimentation of | |
| | the proposed financial service. | |
| vi. | A clear and suitable exit and transition | |
| | strategy in the event that the proposed | |
| | financial service has to be discontinued or if it | |
| | proceeds for deployment on a broader scale. | |

Section C: Standard Technology Risk Management Questionnaire for FinTech Regulatory Sandbox Application

This questionnaire is used for preliminary assessment of your technology risk environment and to determine the controls that are already in place for effective management of technology risk and cybersecurity, as well as to protect consumer data.

Please note that the questionnaire provides only baseline level of controls and your company should assess your risk and control adequacy commensurate with the size, nature and types of your products and services as well as the complexity of your IT operation.

All information provided in this questionnaire shall be kept confidential and BDCB Technology Risk may conduct more detailed assessments based on the information given.

1. IT Governance

| Does your company has IT | ☐ Yes ☐ No |
|------------------------------|------------|
| personnel? | |
| Please indicate how many IT | |
| personnel that are in Brunei | |
| Darussalam | |



| What are main roles and responsibilities of the IT personnel? | |
|--|------------------------------------|
| Does the IT personnel report to a | ☐ Yes ☐ No |
| senior management? | |
| 2. IT Standard, Policies and A | |
| | ☐ Yes, both |
| Does your company has IT | ☐ Yes, IT strategy only |
| and/or cybersecurity strategy? | ☐ Yes, cybersecurity strategy only |
| | □No |
| What international standard, framework or best practices that your company follow? | |
| How are these strategy | |
| communicated to your | |
| | |



| What types of cybersecurity | |
|-----------------------------|--|
| awareness program does your | |
| company have for your | |
| personnel? | |
| What types of awareness | |
| program does your company | |
| have for your customers? | |

3. Third Party Vendor / Service Provider

| List down all vendors and service providers that your company engaged with | What is the service provided to your company? | Has contract or Service Level Agreement you're your company? | Have signed Non- Disclosure Agreement? | Do they have presence in Brunei Darussalam or provide local support? |
|--|---|---|--|--|
| 1. | | □ Yes | □ Yes □ No | ☐ Yes ☐ No |
| 2. | | □ Yes □ No | □ Yes □ No | □ Yes □ No |
| 3. (Please add more row for additional engagement) | | | | |



| List down all cloud services that your company are using and briefly state scopes of the service | Do they provide information on where your company data are stored? | How they use your data? (Please review their Terms of Use and Privacy Policy) | Do they have presence in Brunei Darussalam or provide local support? |
|--|--|---|--|
| 1. | ☐ Yes☐ No☐ If yes, please state: | ☐ Only necessary to run operation and deliver service ☐ For product and service improvement ☐ Do not sell to data analytics or advertising company ☐ Do not share to other third party (e.g. affiliates, social media) ☐ Not clearly stated | □ Yes □ No |
| 2. | ☐ Yes ☐ No If yes, please state: | ☐ Only necessary to run operation and deliver service ☐ For product and service improvement ☐ Do not sell to data analytics or advertising company ☐ Do not share to other third party (e.g. affiliates, social media) ☐ Not clearly stated | □ Yes □ No |



| 3. (Please add new row for | | | | | |
|-------------------------------------|----------------|----------------------------------|-----------------|--|--|
| additional cloud service | | | | | |
| provider) | | | | | |
| | | | | | |
| Note: Service providers also ind | clude Head Off | ice, Regional Office, Parent Con | npany, partner, | | |
| subsidiary, affiliate and other cou | nterparts. | | | | |
| | | | | | |
| Does your company has IT | ☐ Yes | | | | |
| vendor assessment and selection | n | | | | |
| process in place? | □No | | | | |
| Does your company has security | / | | | | |
| screening process on vendor or | □ Yes | □ Yes | | | |
| service provider personnel prior | □No | □No | | | |
| to entering your company? | | | | | |
| Does your company perform | | | | | |
| periodic review of the | □ Yes | | | | |
| performance of your vendor and | d 🗆 No | | | | |
| service provider? | | | | | |
| | | | | | |
| 4. IT Assets | | | | | |
| Does your company keep track | ☐ Yes ☐ No |) | | | |
| | | | | | |
| of IT asset register and | If yes, does | t include the following? | | | |
| inventory? | □ Hardware | □ Software □ Data □ Devices □ | ☐ Licenses | | |
| Does your company has IT | ☐ Yes | | | | |
| procurement process in place? | □No | | | | |



| Does your company has IT asset | □Yes |
|-----------------------------------|---|
| management policy? | □No |
| Does the policy cover on secure | □Yes |
| disposal of data and IT assets? | □No |
| Does your company ensure your | ☐ Yes, using industry configuration baseline |
| IT assets are securely | \square Yes, based on vendor recommendation |
| configured? | □No |
| | □ Windows |
| Which operating systems are | □ Mac OS |
| used by your personnel for | ☐ Linux (Any distribution) |
| work? | ☐ Chrome |
| | ☐ Others: |
| Does your company ensure all IT | ☐ Yes, performance maintenance |
| asset are well maintained, such | ☐ Yes, software updates |
| as for performance and software | ☐ Yes, security fixes |
| updates? | □No |
| Does your company allow any | |
| personnel to install any software | □Yes |
| on their laptop or desktop (e.g. | □ No |
| without administrator | L NO |
| permission)? | |
| Are personnel allowed to use | □Yes |
| removable storage or USB drive | ☐ Yes, but restricted to certain personnel |
| to copy files or documents from | □ No |
| your company desktop and | |
| laptop? | □ No, USB is disabled by default |



| Does your company allow | |
|----------------------------------|--|
| | |
| personnel to use their own | □ Yes |
| personal devices (i.e. laptop, | □No |
| smartphone) for work purpose? | |
| Does your company has Bring- | |
| Your-Own-Device policy or any | |
| other similar policy relating to | ☐ Yes |
| | □No |
| the use of personal devices for | |
| work? | |
| | |
| 5. IT Access Control | |
| Does your company have user | ☐ Yes, for personnel |
| access management policy for | ☐ Yes, for customer |
| personnel and customer? | □No |
| Does your personnel and | |
| customer are required to use | ☐ Yes, for personnel |
| strong password for their | ☐ Yes, for customer |
| account such as having minimum | |
| password length and password | □ No |
| complexity? | |
| complexity: | |
| | ☐ Registration page on the website or apps |
| How customer register to your | ☐ Fill in and submit registration form |
| How customer register to your | |
| system? | ☐ Submit directly to our front-line staff |

 $\hfill\square$ User credential provided through letter



| | ☐ Password reset option on the login page |
|--|--|
| | ☐ Customer must call us directly |
| How do you handle customer | ☐ Security questions must be answered |
| who have forgotten their password? | ☐ Reset link or password provided through email |
| passworu: | ☐ Reset link or password provided through SMS |
| | ☐ Others: |
| Does your system implement | □Yes |
| two-factor authentication (2FA) | □No |
| such as OTP or PIN through SMS, | |
| email or software token? | If yes, please state the type of 2FA: |
| Each parcappal is given their | □ Yes |
| Each personnel is given their own unique user account? | ☐ No, they are using shared user account |
| Own unique user account: | ☐ No, they do not require user account to access |
| | ☐ IT personnel |
| Which of the following have | ☐ Management |
| access to privilege user accounts | ☐ Vendor/service provider |
| (e.g. administrator, super user)? | ☐ Business function/end-user |
| | ☐ Compliance officer |
| | ☐ System/Application |
| All username and password of | ☐ Database |
| default administrator accounts of | ☐ Server/Virtual or Cloud Platform |
| the following have been | ☐ Desktop and Laptop |
| changed? | ☐ Wireless and Network Devices |
| | □ Domain |



| Does your company enable | ☐ Yes, enabled on our system |
|------------------------------------|------------------------------|
| audit and review trail and/or user | ☐ Yes, review periodically |
| access logs on your system? | □No |

6. IT Application

| | □ Yes □ No |
|----------------------------------|---|
| Does your system use web | |
| browser for access? | Please indicate which website domain it is registered with: |
| | |
| Does your system support most | □Yes |
| web browser on laptop and | □No |
| desktop? | |
| (Please ignore if your system is | If not, please list which web browsers or operating system |
| not using web browser) | that are not supported: |
| - | |
| Does your company ensure third | |
| party plugins, add-ons or | □Yes |
| extension on the web browsers | □No |
| of your company desktop and | |
| laptop are disabled? | |
| | ☐ Yes ☐ No |
| | |
| Does your system use | Please indicate which smartphone operating system is |
| smartphone application (app) for | supported: |
| access? | ☐ Apple iOS |
| | ☐ Google Android |
| | ☐ Others: |



| | □ Yes |
|--|--|
| Fau iOC and Andraid in | □ No, Brunei Darussalam only |
| For iOS and Android, is your | ☐ No, within this region (Asia Pacific) only |
| smartphone app downloadable on any region of | ☐ No, but downloadable if the phone GPS is in Brunei |
| AppStore/Google Play? | Darussalam |
| Apparore, google Flay: | ☐ No, but downloadable if connected on Brunei |
| | Darussalam's network |
| | □ Yes |
| Does your smartphone app | □No |
| support older version of operating systems? | If no, how do you determine which versions were no longer supported? |
| Does your personnel use | ☐ Yes, both |
| desktop application to access | ☐ Yes, for back-end system only |
| the system such as for front-line | ☐ Yes, for front-line staff only |
| staff and bank-end system? | ☐ No, web browser or smartphone app is used instead |
| | □No |
| Can the personnel change | □Yes |
| application configuration | □No |
| through the back-end system? | |
| Does your company ensure your | ☐ Yes, bug fix and compatibility update |
| system application are | ☐ Yes, security patches |
| periodically updated for bug fix | ☐ Yes, application enhancement (e.g. user interface) |
| and security patches? | □No |



| | ☐ Microsoft SQL Server |
|--------------------------------|-----------------------------------|
| | □ Oracle Database |
| What type of database is used | ☐ MySQL |
| for your system? | ☐ Microsoft Access |
| | □ XML |
| | ☐ Others: |
| Does your company has official | ☐ Yes ☐ No |
| e-mail domain (i.e. | |
| @yourcompanyname.com) for | Please indicate domain name: |
| all personnel? | |
| What e-mail server or service | ☐ In-house ☐ Third-party service |
| that your company used? | |
| | Please indicate service provider: |

7. IT Incident

| Does your company has IT incident response and handling procedure? | □ Yes □ No |
|--|---|
| Does this procedure includes cybersecurity incident? | ☐ Yes ☐ No, but we have procedure for cybersecurity incident ☐ No |
| | ☐ Yes, include on how to inform the customer or public |
| Does the procedure include | \square Yes, include the contact number of each stakeholder |
| communication plan? | \square Yes, on who should be informed during incident |
| | □No |



| Does your company has Business | |
|----------------------------------|-----------------------------|
| Continuity Plan to ensure | □Yes |
| continuity of business during | □No |
| major IT incident? | |
| Does your company has disaster | □Yes |
| recovery site for your system in | □No |
| case there are prolonged | |
| disaster on your primary site? | If yes, please state where: |

Section D: Financial Consumer Protection Checklist for Fintech Regulatory Sandbox Application

This checklist is used to assess whether measures have been put in place to ensure the best interest and protection of its customers. Among the measures that should be implemented include ensuring transparency and disclosure, providing an avenue for queries and complaints, and raising consumer awareness.

Companies applying to the FinTech Regulatory Sandbox may refer to the following BDCB Notices/Guidelines as a basis for the minimum standards for financial consumer protection –

- 1. Notice For The Establishment Of A Complaints Handling Function Within Financial Institutions [Notice No. FCIU/N1/2017/1];
- 2. Notice on Market Conduct [Notice No. FCIU/N2/2017/1];
- Guidelines On Fit And Proper Criteria For Financial Institutions' Frontline Staff [Guidelines No. FCI/G1/2018/1];



4. Guidelines to Islamic banks, banks, finance companies, takaful operators, insurance companies on Product Transparency and Disclosure [Guidelines No. FCI/G1/2019/1, Guidelines No. FCI/G2/2019/1, Guidelines No. FCI/G3/2019/1, Guidelines No. FCI/G52019/1, respectively].

All information provided shall be kept confidential and BDCB Financial Consumer Issues may request further information, if needed.

1. Disclosure and Transparency

| Are there any interest, fees, |
|------------------------------------|
| charges or penalties in the use of |
| your product/service? If so, |
| please indicate where this |
| information is provided in your |
| terms and conditions (T&C). |
| At which point of a customer |
| subscribing to your product will |
| the T&C be provided to them? |
| How will the customer be able to |
| access and refer back to the T&C? |
| Will a soft copy or hard copy be |
| provided? |
| |



| | What steps are put in place to | |
|----|------------------------------------|--|
| | ensure that a customer reads and | |
| | understands the T&C? How much | |
| | time is provided for the customer | |
| D. | to review the T&C? What avenues | |
| | are available to the customer to | |
| | ask or receive further information | |
| | prior to subscribing to your | |
| | product/service? | |
| | T&C can sometimes be too | |
| | lengthy and full of jargon that | |
| | discourages customers from | |
| | reading them completely. Do you | |
| | intend to provide a summary of | |
| E. | the key points, in particular any | |
| | risks from subscribing to your | |
| | product/service, from the T&C, | |
| | such as a product disclosure | |
| | sheet or FAQ for the ease of the | |
| | customer? | |
| | Please list the avenues that a | |
| | customer is able to obtain further | |
| F. | information on your | |
| | product/service (e.g. website, | |
| | social media, etc). | |
| G. | How does your company take | |
| | into consideration the following - | |



| | 1. Information on your |
|-----|------------------------------------|
| | product/service is in a language |
| | that is accessible and acceptable |
| | to all; |
| | |
| | 2. The design of your |
| | platforms and how information |
| | |
| | will be displayed (e.g. screen |
| | size, font size). |
| | What avenues do you intend to |
| | advertise/promote your |
| | product/service? What measures |
| Н. | are in place to ensure that these |
| 11. | advertisements/promotional |
| | materials are accurate, updated, |
| | relevant, and not |
| | false/misleading? |
| | Does your company intend to |
| | carry out any initiatives to raise |
| | consumer education or |
| l. | awareness on your |
| | product/service, as well as any |
| | associated risks? |
| | associated fisks? |



| | How will you communicate to |
|------|----------------------------------|
| | customers that you are |
| | participants of the Regulatory |
| J. | Sandbox (i.e. and NOT a fully- |
| | licensed entity regulated under |
| | BDCB)? |
| | How and when will you |
| | communicate to customers your |
| K. | exit and transition plan, in the |
| - K. | event that the proposed |
| | product/service has to be |
| | discontinued? |

2. Customer Service and Complaints/Queries Handling

| | What avenues are available for |
|----|----------------------------------|
| A. | customer queries, feedback, and |
| | complaints? |
| | How many staff members will |
| | you have who are responsible for |
| | customer service and/or |
| | complaints/queries handling? |
| B. | What steps will be taken to |
| | ensure that staff members are |
| | able to handle customers |
| | effectively and professionally |
| | (e.g. training)? |



| | What standard operating |
|----|------------------------------------|
| | procedures are in place to ensure |
| | queries/complaints are handled |
| | timely and effectively? Is there a |
| C. | timeline in place for |
| | queries/complaints to be |
| | resolved? How will you ensure |
| | queries/complaints are recorded |
| | and monitored effectively? |
| | How will you inform customers |
| | and raise awareness on the |
| D. | available channels for queries, |
| | feedback and complaints? |
| | |

Section E: Anti-Money Laundering and Combatting the Financing of Terrorism (AML/CFT) Questionnaire for Fintech Regulatory Sandbox Application

This section is a preliminary assessment on your institution's Anti Money Laundering and Combatting the Financing of Terrorism (AML/CFT) measures provisioned under the Criminal Asset Recovery Order, 2012 and any relevant AML/CFT legislation.

All information provided in this questionnaire shall be kept confidential and may be used for more detailed assessments.

A. Measures to Prevent and Detect Money Laundering and Terrorism Financing

1. Please describe the risk assessment conducted to identify risks (particularly ML/TF Risks) associated with the products and services proposed/offered by your company.



| 2. | Please describe the process in place to obtain and verify customer identification. |
|----|--|
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| 3. | What are your record keeping policies? How long are records kept? Are records kept in |
|-------|---|
| hardc | opy or softcopy? |
| | |
| | |
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| 4. | What processes do you have to detect suspicious transactions? |
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| | |



| 5. What type of system is implemented to monitor transactions conducted by your | | | | |
|---|--|--|--|--|
| customers? Please describe how the system detects any anomalies. | | | | |
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| | | | | |
| 6. Have you designated a compliance officer responsible for the implementation of items 1 – | | | | |
| | | | | |
| 5? If so, please provide full name, designation and contact details for our reference. | | | | |
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| | | | | |
| B. Supporting Documents | | | | |
| Please provide the following documents – | | | | |
| | | | | |
| AML/CFT policy of the organisation | | | | |
| Identification document(s) and CV(s) of the Compliance Officer(s) | | | | |



| Organisation structure | |
|--|--|
| Job description(s) of Compliance personnel | |



Section F: Declaration

This application is completed by -

| Name of Officer | | | | | |
|--|---------------------|--|--|--|--|
| Position | | | | | |
| Contact No. | | | | | |
| E-mail address | | | | | |
| Signature | | | | | |
| Date | | | | | |
| | | | | | |
| I hereby declare that | all information pro | ovided in this application and its annexures is true and | | | |
| correct. I certify that the information given in this application is complete and accurate to the best | | | | | |
| of my knowledge, information and belief and that there are no other facts relevant to this | | | | | |
| application of which BDCB should be aware. I further undertake to inform BDCB of any changes | | | | | |
| material to the application which arise while BDCB is considering the application. | | | | | |
| | | | | | |
| Signature of Chief Executive Officer/ | | | | | |
| Managing Direc | ctor/Head of | | | | |
| Organisation] | | | | | |
| | | | | | |
| | Date | | | | |