

## বাংলাদেশ কৃষি ব্যাংক প্রধান কার্যালয়, ঢাকা

ম্যানপাওয়ার প্র্যানিং এন্ড ভেন্ডেলপ্রেন্ট বিভাগ

Phone: 9551655 www.krishibank.org.bd

নং-প্রকা/এমপিডি-৭৯(অংশ-১)/২০১৭-১৮/১৮৯

তারিখঃ ১২.০৩.২০১৮ খ্রীঃ

সকল মহাব্যবস্থাপক
বিভাগীয় কার্যালয়,
সকল বিভাগীয় নিরীক্ষা কর্মকর্তা
বিভাগীয় নিরীক্ষা কার্যালয়,
সকল উপমহাব্যবস্থাপক
কর্পোরেট শাখা,
সকল মুখ্য আঞ্চলিক/আঞ্চলিক ব্যবস্থাপক
মুখ্য আঞ্চলিক/আঞ্চলিক কার্যালয়,
সকল আঞ্চলিক নিরীক্ষা কর্মকর্তা
আঞ্চলিক নিরীক্ষা কার্যালয়
সকল শাখা ব্যবস্থাপক(মুখ্য আঞ্চলিক/আঞ্চলিক কার্যালয়ের মাধ্যমে)।
বাংলাদেশ কৃষি ব্যাংক।

#### বিষয়ঃ অভ্যন্তরীণ নিয়ন্ত্রণ ও পরিপালন ম্যানুয়েল-২০১৭ তে পরিবর্ভিত প্রভিবেদন সংযোজন প্রসংগে।

প্রিয় মহোদয়.

শিরোনামে বর্ণিত বিষয়ে জত্র বিভাগ কর্তৃক বিগত ২৮/০৬/২০১৭ খ্রীঃ তারিখের প্রশাসন(এমপিডি) পরিপত্র নং-১২/২০১৭ এর মাধ্যমে প্রেরিত অভ্যন্তরীণ নিয়ন্ত্রণ ও পরিপালন ম্যানুয়েল-২০১৭ এর প্রতি দৃষ্টি আকর্ষণ করা যাচেছে।

- ০২। উক্ত ম্যানুয়েদের পরিশিষ্ট-৯ তে (১০৩ পৃষ্ঠা) Self Assessment of Anti Fraud Internal Controls (Quarterly) প্রতিবেদন সংযুক্ত করা আছে। উল্লেখ্য বাংলাদেশ ব্যাংকের ডিপার্টমেন্ট অব অফ-সাইট সুপারডিশন এর ০৯/০৫/২০১৭ তারিখের ডিওএস সার্কুলার লেটার নং-১০ এর মাধ্যমে বর্ণিত প্রতিবেদনটির পূর্বের ৫৩ ও ১২ কলামের পরিবর্তে ৭৮ ও ১৩ কলাম যুক্ত করা হয়েছে এবং ব্রৈমাসিকের পরিবর্তে বান্মাসিক ভিত্তিতে প্রতিবেদনটি বাংলাদেশ ব্যাংকের সংখ্রিষ্ট বিভাগে প্রেরণের নির্দেশনা প্রদান করা হয়েছে। পরিবর্তিত Self Assessment of Anti Fraud Internal Controls (Halfyearly) প্রতিবেদনটি বিগত জুন/২০১৭ তারিখ হতে কার্যকর করা হয়েছে।"
- ০৩। বাংলাদেশ ব্যাংকের উপরোল্লিখিত নির্দেশনার আলোকে অভ্যন্তরীণ নিয়ন্ত্রণ ও পরিপালন ম্যানুয়েল-২০১৭ এর (১০৩ পৃষ্ঠা) পরিশিষ্ট-৯ এর Self Assessment of Anti Fraud Internal Controls (Quarterly) ৫৩ কলাম বিশিষ্ট প্রতিবেদনটির পরিবর্তে যান্মাসিক ভিন্তিতে Self Assessment of Anti Fraud Internal Controls ৭৮ কলাম বিশিষ্ট এবং ১৩ কলাম বিশিষ্ট Statement of Fraud and Forgeries detected and unsettled up to the previous reporting period since the inception of the bank ও Statement of Fraud and Forgeries detected during reporting period প্রতিবেদনের ছক গুলো প্রতিস্থাপিত হবে।
- ০৪। এমতাবস্থায়, ইতোপূর্বে জারীকৃত অভ্যম্ভরীণ নিয়ন্ত্রণ ও পরিপালন ম্যানুয়েল-২০১৭ এর (পৃষ্ঠা নং-১০৩) পরিশিষ্ট-৯ তে উল্লেখিত সংশোধনী ব্যাংকের প্রধান কার্যালয়সহ মাঠ পর্যায়ের সকল কার্যালয় ও শাখা সমূহকে পরিপালন ও অনুসরণের জ্বন্য অনুরোধ করা হলো।

অনুমোদনক্রমে-

সংযুক্তিঃ বর্ণনামতে।

(বেলাল আহমেদি) উপমহাব্যবস্থাপক

তারিখঃ ১২.০৩.২০১৮ খ্রীঃ

অপিনার বিশ্বত

নং-প্রকা/এমপিডি-৫৪(অংশ-১)/২০১৭-১৮/ ১৮৯(১২০৫)

সদয় অবগতির জন্য অনুলিপিঃ

- ০১. চীফ স্টাফ অফিসার, ব্যবস্থাপনা পরিচালক মহোদয়ের সচিবালয়, বাংলাদেশ কৃষি ব্যাংক, প্রধান কার্যালয়, ঢাকা।
- ठ्यः अगिक अधिमात्र, উপव्यवश्वापना भित्रिणक मरहामयगरात्र मित्राणयः, वाश्मारमण कृषि व्याःक, व्यथान कार्याणयः, जाका ।
- ০৩, স্টাফ অফিসার, মহাব্যবস্থাপক মহোদয়গণের দণ্ডর, বাংলাদেশ কৃষি ব্যাংক, প্রধান কার্যালয়, ঢাকা।
- ০৪. অধ্যক্ষ (মহাব্যবস্থাপক), স্টাফ কলেজ, বাংলাদেশ কৃষি ব্যাংক, প্রধান কার্যালয়, ঢাকা।
- ০৫. স্টাফ অফিসার, মহাব্যবস্থাপক, স্থানীয় মুখ্য কার্যালয়, ঢাকা।
- ०५, সচিব, পর্ষদ সচিবালয় বিভাগ, বাংলাদেশ কৃষি ব্যাংক, প্রধান কার্যালয়, ঢাকা।
- 1⁄0৭. উপমহাব্যবস্থাপক, আইসিটি সিস্টেমস্ বিভাগ, বিকেবি, প্রকা, ঢাকা। পত্রটি ব্যাংকের অফিসিয়াল ওয়েব সাইটে আপলোড করার প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য আইসিটি অপারেশন বিভাগকে অনুরোধ করা হলো।

ob. নথি/মহানথি।

সহকারী মহাব্যবস্থাপক

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### **Self-Assessment of Anti-Fraud Internal Controls**

SI. No.	Particulars	Yes	No	Partial•	Remarks•• (If any)
	Internal Control & Compliance(ICC)		5		
01	Does the senior management ensure communication of different prudential regulations, policies etc. issued time to time by bank itself, regulator and government throughout the bank?				
02	Does the Audit Committee (AC) review the audit findings and compliance status at least on quarterly basis and take actions accordingly? If yes, attach the related memo.				
03	Policy and structure of ICCD				
	a) Has the bank reviewed its own ICC guidelines in light of guidelines issued by BB and continued to review on yearly basis?				
İ	b) Is the organogram & structure of the ICCD in accordance/conformity with those prescribed in the ICC guidelines by BB?				
	c) Does the ICC Department have adequate manpower with professional knowledge, banking experience etc. to conduct audit activities as required by the bank?				
	d) is the bank's internal Audit Department well equipped with IT people to conduct audit in IT environment?				
	e) Does the work scope of the ICCD cover all the issues of Charter narrated in the ICC Guidelines?				
	f) Does the bank update Fraud Management Policy, Audit Manual etc. every year?				
	g) Has the Fraud Management Policy been Implemented in case of settlement of detected fraud-forgeries?				
	h) Does the bank have a central database/corporate memory of fraud-forgeries¹ occurred in the bank?				
04	Has the bank complied with the instructions of Guidelines on Internal Control & Compliance in Banks regarding preparation and submission of report on its own health?				
05	Is the overall effectiveness of the internal control system, policies & procedures of the bank evaluated at least annually by the proper authority with the approval of the board to prevent recurrence of the material irregularities/fraud/forgeries and also to address the changing environment?				
06	Were there any incidents of fraud/forgery published in the media but the ICCD falled to detect?				
07	a) Does the Monitoring Unit review Quarterly Operations Report (QOR), Loan Documentation Checklist (LDCL) etc. effectively to monitor the operational performance of the branches?				
	b) Is the DCFCL (Departmental Control Function Checklist) reviewed by Departmental Managers, Line Managers, and Branch Managers at the prescribed frequencies?		•		

\*At least 50% briplemented items are to be answered in 'Partial' column.

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\*\*Remarks' column is to be filled up with the actual percentage of implementation for 'Partial' answers, time Emit for full implementation of partial and unimplemented items and any other related information bank destires to include.

\*\*Material losses for banks due to creation of fake loan accounts, defalcation of money, unauthorized fund transfer from one account to another, fake issuance of PO, DD, credit rard, debit card etc., Embezziement of money by forged cheque, cash embezziement through online transaction, defalcation of money by creating fraud overdraft, amount received from depositor but not deposited to a/c, unauthorized withdrawal from suspense a/c, forged FX document etc.

(Signature) Initiating Officer

SI. No.	Particulars	Yes	No	Partial	Remarks (if any)
08	Are the employees provided with clear authority/delegation of power and job description to perform the daily activities of the bank with proper documentation of hand over and take over charges when applicable?				
09	Does the bank have risk-based auditing system and ensure its implementation?				
10	Does the ICCD evaluate the degree of risk, at least annually, of every department/office/branch/subsidiary/foundation/regional office in addition to regular audit of bank branches?				
11	Does the bank have any policy regarding admonitory/reproving measures for internal auditors in case of their failure in applying due diligence to the responsibility assigned to them?				
12	Are job rotation, transfer, posting and mandatory leave (where applicable) for the employees strictly followed as per Bangladesh Bank guidelines?				
13	a) Does the bank have centralized system to monitor all deposits and loan accounts including staff?				
	b) Does the ICCD ensure monitoring of staff accounts and other accounts operated by the staff at least on monthly basis through getting certification from branch manager/regional office in absence of centralized system?				
14	a) Are the senior management assigned with responsibility for fraud management so that employees of all level get conscious about prevention and detection of fraud/forgeries?      b) Does the senior management perform their responsibilities.				
	assigned to them properly for minimizing fraud/forgery?				
15	Does the bank perform screening of applicants before appointment particularly to cash handling positions, and other trusted positions such as treasury, accounts, security and ICT (techniques include confirmation of qualifications, verification of employment background, criminal history searches etc.)?				
	General Banking and Operation				
16	Does the account opening branch ensure customers' address through cross reference checking and maintain proper records in case of new accounts?				
17	Does the bank restrict the access of persons/belongings (which are not related to cash) to the cash area to prevent defalcation of cash and cash equivalents?				
18	Does the bank ensure Balance Confirmation for both loan and deposit accounts to the customer, any way, at least once in every six months?				
19	Is there any policy to inform the customers about different charges debited from their accounts and whether it is implemented?				
20	a) Is effective reconciliation of inter branch/General Account in place and necessary action taken to reconcile the long-pending (three months and above) items?				
	b) Does the bank produce monthly reconciliation status to the senior management to ensure proper monitoring of reconciliation?				
SHAR	c) Are reconciliation activities of the department/division/unit/section audited at least once in a year?	•			

(Signature) Initiating Officer

SI. No.	Particulars	Yes	No	Partial	Remarks (if any)
41	Does the bank ensure retaining original copy of bill of lading/airway bill and second copy of LCAF till the adjustment of the extended credit facilities (PAD/BLC/MIB)?				
42	Does the bank ensure keeping 100% margin against issuance of the shipping guarantee (in case of the original import bill not yet received by the bank)?				
43	a) Is there any instance of extending post import finance (LTR/MTR etc.) in spite of having overdue LTR facilities?				
	b) If yes, is it approved by the competent authority?				
44	a) Does the bank restructure overdue LTR facilities?				
	b) Does the bank ensure monitoring the stock of imported goods with the LTR outstanding?				
45	Is there any instance of extending Packing Credit (PC) facilities before opening of Back to Back L/C?				
46	Does the bank extend every IBP facilities only after taking approval from head office?				
47	Does the bank ensure physical delivery of goods and application of due diligence against extended IBP/ABP facilities (as per BRPD circular no. 10/2012)?				
48	Does the bank ensure genuineness of the export contract/letter of credit (in accordance with the SWIFT code) before taking lien?				
49	Does the bank examine the export documents (especially BL/AWB, customs certified EXP, Acceptance-In case of deferred bill) properly to prevent fraud-forgeries?				
50	a) Does the bank verify the credit worthiness of foreign buyer to ensure repatriation of export proceeds?			D.	
	b) Does the bank report un-repatriated export proceeds to BB in due time?				
51	Is there any instance of violation of limits set by the bank for treasury functions? If yes, mention the number of instances and amount there against.				
52	a) Does the bank ensure reconciliation of Nostro Accounts on regular basis and report the same to the higher authority?				
	b) Does the bank have un-reconciled entries for more than 3 months in Nostro Accounts? if yes, is provision maintained against that?				
1.	Information and Communication Technology (ICT)		Direction of the last of the l		
53	Does the bank have an 'ICT Security Policy' in line with BB guidelines as well as the business objectives?				
54	Does the bank review its 'ICT Security Policy' at least once in a year to cope with the evolving changes in the ICT environment and have it approved by the Board of Directors?				
55	Does the bank carry out Information System (IS) audit (internal/external) at least once a year to find out weaknesses in the systems and take appropriate measures to mitigate the risks?				
56	Does the bank ensure implementation of privileged access control system to monitor the activities of privileged users like System Administrators, Database Administrators, Backup Administrators, Key Business Users, etc.?				

(Signature) Initiating Officer

SI. No.	Particulars	Yes	No	Partial	Remarks (if any)
57	Does the bank undertake periodic vulnerability assessment and penetration testing procedures to find out threats and vulnerabilities and take relevant remediation?				
58	Are there appropriate risk mitigation measures like operating time schedule for the users, transaction limit, transaction frequency limit, AML checks, etc. depending on the risk perception, unless otherwise mandated by the Bangladesh Bank?				
59	Has the bank established an incident management process to log all incidents for proper resolution and future reference and a CERT (Computer Emergency Response Team) to respond immediately when necessary?				
60	Does the bank have implemented Fraud Management Controls to prevent online fraudulent transactions from different delivery channels like ATM, POS, Internet Banking, E-commerce, Mobile Banking, etc. based on different business logics like transaction frequency, transaction geo-location, transaction pattern, etc.				
61	Are the 'high value' transactions approved by appropriate personnel having proper Delegation of Authority (DOA)?				
62	Does the system generate daily transaction report for high value transactions and send it to internal compliance unit?				
63	Does the bank have implemented Automated Customer Alerts (SMS, Email) for any kind of transactions like withdrawal, deposit, transfer, etc.?				
64	Is there any system in place to store and archive Database, Perimeter and Core Devices, Web Server and Mission Critical Servers log files for monitoring and pointing out suspicious attempts and activities?				
65	Is there any central monitoring system to follow-up ATM Cash Balance status, Loading/Unloading activities, ATM disorder and malfunction, etc.?				
66	Is there any established procedure to segregate the Card personalization, PIN generation, and Card distribution activities?				
67	Are the appropriate measures taken to prevent counterfeit and skimming cards at ATM?				
68	Are the appropriate measures taken to prevent Email security threats like SPAM, Phishing, Spoofing, Flooding, Hoaxes, etc.?				
69	Does the bank have implemented dynamic OTP (One-Time Password) or Security Token as 2FA (Two Factor Authentication) for online transactions like Ecommerce, Internet Banking?				
70	Has the bank implemented Dual Control System for- Lis WIFT transactions Lis Cash loading/unloading in ATM Lis Branch Teller transactions (as per DOA)				
71	Is there any practice of accompanying vendor support personnel by bank's official while working at sensitive area like Data Center?				
72	Is a mechanism in place to encrypt sensitive information in portable devices like Laptop, External HDD, Tape Drive, etc. and also travelling through public network?				
73	Are all external network connections routed through a Firewall?				

(Signature) Initiating Officer

SI. No.	Particulars	Yes	No	Partial	Remarks (If any)
74	Does the bank have technological enforcement to all employees for changing their passwords periodically as per bank's ICT Security Policy?				
75	Does the bank follow appropriate Procurement Policy for procuring any kind of IT services like Hardware, Software, Support, Consultation, etc.?				
76	Has the bank taken appropriate measures to accommodate all controls and practices stated in the guidelines on Core Banking Solution (CBS) Features and Controls?				
77	Does the bank distribute Computers, Laptops and electronic gadgets to end users from their ICT Division to maintain a set standard of Hardware configuration and Software installation?				
78	Does the bank put restrictions on connecting BYODs (Bring Your Own Devices) and external devices to bank's network?				

Questions are to be answered using 'V' mark in the respective column.

The supporting documents/papers in favor of 'yes/partial' answers have to be preserved in the ICC Department for future reference.

(Signature and seal including name)
Head of Compliance

(Signature and seal including name)
Head of ICCD

**Confidential** 

### Bank Name: .....

# Statement of Fraud and Forgeries detected and unsettled up to the previous reporting period since the inception of the bank

SI. no.	Type of fraud	Techniques applied to make fraud	Name of the Branch	Dat of Occurrence		Amount involved	Adjustment of the defrauded amount (recovered from concerned person/write off or other way)	Name of the Officers/ Employees/others Involved	Action taken against the delinquent Officers/ Persons	Current status of the case	Initiatives taken to prevent recurrence of the incidents	
1	2	3	4	5	6	7	8	9	10	11	12	13

<sup>\*</sup>In case of no such fraud-forgeries, NIL statement has to be submitted.

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SI. na.	Type of fraud	Techniques applied to make fraud	Name of the Branch	Date Occurrence	Of Detection	Amount involved	Adjustment of the defrauded amount (recovered from concerned person/write off or other way)	Name of the Officers/Employees/ others involved	Action taken against the delinquent Officers/ Persons	Current status of the case	tnitiatives taken to prevent recurrence of the incidents	Remarks
1	2	3	4	5	6	7	8	9	10	11	12	13

<sup>\*</sup>In case of no detection of fraud-forgeries, NIL statement has to be submitted.