



COMPLIANCE CHARTER

DEPARTMENT COMPLIANCE 2018

Code: CC-001-0001-01

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Introduction:

Purpose of compliance department is supporting the bank, in the field of Compliance Risk Management, the risk that can be in the sense of legal or regulatory sanctions, financial losses or damages risks to a banks credit as a result of its disability to comply with the laws, regulations, criteria and appropriate executive standards (totally in laws, regulations and standards). The compliance risk may consider as integrity Risk¹ of Bank operations, because reliability credibility of a bank has a close relation with its Adherence to the correctness of banking operations and also performing the fair transactions. in order to acquaintance of country's Banking Network, with the literature of the subject and operations of compliance department, Central Bank has notified circular-letter no. 88/23765 dated 27.04, 2009 and also in the framework of Corporate governance system order the directive of " supervisory requirements on Corporate governance in non-governmental credit institutes" with no. 96/51935, date 14.05, 2017 to the bank network. Also about the considered Status of this department in organizational structure of banks, due to fundamental and important role of this department to manage all bank risks, a collection – has been notified under the title of “guidelines for effective management of compliance risk” that has been regarded as minimum requirements to create compliance department.

Charter of compliance and clarification department of Tourism Bank has been compiled in the line with achieving the strategic goals, in order to maintain bank health and beneficiaries confidence and preventing any type of non-compliance with laws, regulations, professional and international standards and Code of Ethics of the bank. This Charter, while Expressing goals and principles, determines the responsibilities and authorities of the board of directors, senior management and all employees of the bank to face with the compliance risks, responsibilities and authorities of the compliance and clarification department and also Its interaction with other departments.

ARTICLE 1 – PURPOSES

The main purposes of the Compliance Department are:

- 1-1-Promoting standard level of the bank to the international and professional acceptable level in compliance and clarification management
- 1-2-Developing and enhancing tools to strengthen the three lines of defense for identifying, evaluating, controlling, monitoring and informing compliance risk.
- 1-3- Helping to effective execution of corporate governance
- 1-4- Adapting the customers' operations, products and processes of the Bank with the Bank's laws, regulations, professional and international standards and code of ethics.
- 1-5- Identifying reputation risks and protecting and promoting the bank reputation.
- 1-6- Ensuring presentation of comprehensive, trustworthy and timely information to the beneficiaries and attracting and maintaining their trust.
- 1-7- Protecting beneficiaries rights and providing their expectations
- 1-8- Institutionalizing compliance culture with participation of all bank's employees.
- 1-9- Empowering the bank's human resources by observing the compliance requirements.

ARTICLE 2 – DEFINITIONS

2-1- Central Bank: Central Bank of the Islamic Republic of Iran

2-2- Senior Management: Managing director/board of directors and that group of the executive managers and senior staff of the bank that are under supervision of managing director/board of directors and have the responsibility of the executing strategies and policies approved by the board of directors according to the case.

2-3- Laws, Regulations and Standards: Include all administrative, financial, commercial laws and regulations and other relevant laws and regulations of the bank which are obligatory, standards, subjects such as professional and international standards and code of ethics and professional principles including management interests conflicts, fairly behavior with the customers and ensuring the suitability of the products and services with the need of customers and so on.

2-4- Compliance: conformity of the bank activities to laws, regulations and standards.

2-5- Reputation Risk: is one of the kinds of compliance risk which cause in damaging the customers and other beneficiaries trusts to the bank.

2-6- legal Risk: the probability of loss resulted from inappropriate consultation or legal documentary, legal mistakes and also inadequacy of the laws and regulations and existing standards to solve the legal subject of the bank and any type of unpredictable changes in the laws, regulations and standards.

2-7- Operational Risk: the probability of appearing losses resulted from inappropriate and inadequacy of the processes and methods, individuals & internal systems and/or external events of the bank.

2-8- Compliance Risk: the probability of applying fine, legal penalties, supervisory punishments, encountering with important losses and/or damaging the good reputation of credit institute, due to non-observance of laws, regulations and standards.

2-9- Compliance and Clarification Department: it means the executing department of compliance risk management that is an independent department and especially has been created for compliance risk management.

2-10- Compliance and Clarification Committee: is a committee under the supervision of board of directors & managing director that performs some part of their assigned duties in relation to compliance Risk Management.

2-11- Compliance Risk Management: the process of identifying, evaluating and measuring, suitable reaction in respect of compliance risk and also continuous monitoring of it.

2-12- Compliance Charter: Document that determines the frame work of all activities of the compliance department. This document is administratively binding at the level of bank after the confirmation of managing director and the board of directors.

ARTICLE 3 – PRINCIPLES OF COMPLIANCE

3-1-the observance of professional ethics principles, truthfulness & clarification are our main responsibilities.

3-2- respecting the public rights and social responsibilities are our priorities.

3-3- our customers are the main focus of creating value and we try to meet their needs.

3-4- We obey current country laws and regulations and our activities are in line with the international standards.

ARTICLE 4 – DUTIES OF THE BOARD OF DIRECTORS AND COMPLIANCE AND CLARIFICATION COMMITTEE

4-1- finally the board of directors is responsible for compliance risk management in relation with the bank's activities.

4-2- Compliance charter of the bank is approved by the board of directors and in the case of need will be reviewed and changed. This charter, while performing a clear & comprehensive definition of compliance, determines responsibilities and limits of authorities of compliance & clarification department & the way of compliance risk management (identifying, assessing, measuring, monitoring, controlling or decreasing of compliance risk).

4-3- The board of directors must ensure the independence of compliance and clarification department.

4-4- The board of directors and managing director approve the macro policies of compliance management.

4-5- The board of directors assign the policy making duties and its own continuous supervision on compliance risks management of the banks to the compliance and clarification committee. Compliance & clarification committee is also aware of how to implement the policies & standards of compliance & existed difficulties & reports its point of views to the board of directors timely & monitors the effective implementation of compliance policies & standards.

4-6- Compliance risk management is obliged the participation of all employees of organization departments. In order to effective management of this risk, the board of directors is obliged all executive departments of the bank to cooperate with compliance department.

4-7- The members of compliance and clarification committee include a member of the board of directors, two independent experts (on the proposal of the managing director and the selection and approval of the board of directors) and chairman of compliance and clarification department (without the right of voting). Member of the board of directors is chairman of the committee and chairman of compliance and clarification is the secretary of committee.

4-8- The committee must evaluate and review the policies and guidelines of compliance at least once a year.

4-9- The committee will evaluate duties of compliance a clarification department though reports received from the senior management, every two months. This committee, in the case of

observing any type of failure and ambiguity in policies and guidelines and/or their non-confirmatory with new regulations & standards will take action for reviewing them in any moment.

4-10- The committee must ensure that compliance and clarification department takes action effectively and rapidly regarding examination and solving the relevant subject in respect of the compliance.

4-11- the Committee can take action for holding the session at any time that deems advisable and should hold at least one session with the presence of all committee members each month.

4-12- The committee can use internal and external advisors to perform its duties and bank must approve the required budget to pay the advisors wages.

ARTICLE 5 – DUTIES OF SENIOR MANAGEMENT

5-1- senior management is responsible for executing the approvals of the board of directors and also monitoring compilation of the processes and procedures regarding effective management of compliance risk.

5-2- senior management ensures the desired performance of compliance activities in the fields of policies and guidelines of compliance management.

5-3- senior management ensures the awareness of goals and principles of professional code of ethics among the staff and while developing and improving organizational values, provide the collective cooperation conditions for effective execution of the laws and regulations and standards.

5-4 - Senior management ensures the efficiency of compliance policies by evaluating them.

5-5-due to measure and complexity of bank activities, senior management with designs and adjust the organizational structure of compliance and clarification department, responsibilities and duties of its manager and staff and its relation with other departments in a way that the independence of the department has been provided.

5-6- To protect the independence of compliance and clarification department and its employees, especially to prevent interests conflict with other departments, Senior management taking required actions and monitors the Continuity of its independence.

5-7- Senior management determines the interaction & cooperation between compliance department and other departments in the framework of the board of directors policies and ensures required cooperation between compliance and clarification department and other departments to perform this subject.

5-8- in the case of detecting violations or non- compliance with the laws, regulations and standards, Senior management will report the matters to the board of directors as soon as possible & will take necessary decisions to perform amending and disciplinary actions.

5-9- senior management communicates details relevant to reporting requirements including reporting the results of monitoring, evaluating compliance risk, any changes in compliance risk status and determining the lines of reporting to staff.

5-10- senior management ensures submitting timely reports of the compliance risk to the compliance department by other departments.

5-11- Managing director monitors the compliance and clarification department performance and reports it to the board of directors.

ARTICLE 6 – SCOPE OF COMPLIANCE RISK

6-1- the compliance and clarification department is responsible for supervising and evaluating compliance risk management. For this purpose compliance risk scope categorized in four fields of employees, customers, organization and services. Examples are as below schedule:

Compliance Risk scope	Examples of compliance Risks
Staff	<ul style="list-style-type: none"> - Violation the bank ethics chart - Receiving gifts and bribe
Customers	<ul style="list-style-type: none"> - Money-laundering - Financing for terrorism - Transaction with the countries and persons in the list of international sanctions
Organization	<ul style="list-style-type: none"> - Disclosure of secret information - Interests Conflict - Violation of regulations relevant to beneficiaries rights
Services	<ul style="list-style-type: none"> - Lack of transparency in cost of services

ARTICLE 7 - RESPONSIBILITIES OF EMPLOYEES & BANK DEPARTMENTS

7-1- All employees and departments of Tourism Bank are responsible for compliance risk management and any type of contrary actions to the laws and regulations, professional and international standards and bank chart of ethics. Each employee is obliged to perform his daily activities in accordance with the laws, regulations and instructions.

ARTICLE 8 – COMPLIANCE RISKS THREE LINES OF DEFENSE

8-1- Tourism Bank manages its Compliance risk using three lines of defense. Three lines of defense model distinguishes between department that owns risk and is responsible for it, and department that ensures efficient compliance risk management in first and second defensive lines of the bank independently. Involved departments in three lines of defense are as described below and each one has the responsibility of their own departments.

8-2- Business management: first line of defense against compliance risks are the business managers. They must consider activities to decrease compliance risk, monitor and report them and take required actions. Business Managers are the main owners of compliance risks and are responsible for damaging consequences resulted from lack of risk management.

8-3- Management of Compliance Risk: 2nd line of defense against compliance risks, is compliance and clarification department which have five roles such as: compliance risks evaluation, designing relevant procedures and organizational controls, planning activities to

decrease compliance risk in organization and monitoring them and also advising other organizational departments regarding compliance risks.

8-4- Internal Audit: 3rd line of defense against the compliance risks, is internal audit that ensures effective designing and operating internal controls and performed activities of first and second lines of defense in compliance risk management.

ARTICLE 9 - MISSION OF COMPLIANCE & CLARIFICATION DEPARTMENT

9-1- effective management of compliance risk and ensuring the maintenance of compliance risk level of the bank in acceptable threshold.

9-2- ensuring the compliance of customer's affairs, provided services and products, internal instructions, with the laws, regulations, professional and international standards and bank chart ethics.

9-3- ensuring the effectiveness & efficiency of the preventing mechanisms, fighting against financial crimes³ and corruption, protecting the rights and interests of beneficiaries, market health and preventing interests conflict.

9-4- ensuring transparency of operations and provided information to the beneficiaries and supervisory authorities especially central bank.

ARTICLE 10 – DUTIES AND RESPONSIBILITIES OF COMPLIANCE AND CLARIFICATION DEPARTMENT

The main duties and responsibilities of this department are:

10-1- Codifying annual program of bank compliance risk management

10-2- Effective relations with the supervisory authorities especially central bank and supervisory authorities of the countries and foreign colleague banks.

10-3- Preparing and executing programs to deepen compliance culture in Bank

10-4- Codifying criteria to ensure the independence of compliance and clarification department and communication strategy of this department with risk management, internal auditing and inspecting and anti-money laundering departments.

10-5- Providing report and helping senior management in observing laws, regulations and standards, especially about last changes of them.

10-6- Continuous tracking of last evolutions obtained from changes of laws, regulations and standards in the bank.

10-7- monitoring the observance of all policies, processes and instructions of the bank and request of the internal controlling supervisors and executors of bank's business fields based on reviewing the policies and instructions related to the working fields.

10-8- Complete awareness and mastery of the laws and regulations and professional and international standards and bank ethics chart.

10-9- informing managers about the laws, regulations and professional and international standards and bank chart of ethics and their changes⁵ and ensuring that all employees are informed.

10-10- Interpreting the laws, regulations & professional and international standards and chart of ethics of the bank and extracting compliance requirements.

10-11- Complete mastery of the laws, regulations of foreign host countries⁶ if the bank is active in that country

10-12- Evaluating the effect of developments and changes of the laws, regulations & standards on activities of the bank and providing suggestion to the managing director about the way of compliance with the above-mentioned matters

10-13- Responding to the receiving inquiries from organizational departments; as the only authorized reference for explaining and interpreting laws, regulations and compliance standards in the bank

10-14- Recognizing and introducing the legal and supervisory requirements of foreign countries in the case of bank overseas activities

10-15- advising and guiding the international department in the field of communication related to brokerage relationship.

10-16- Determining and extracting check list of other departments activities in the field of compliance risk and financial transparency of the bank

ARTICLE 11 - COMPLIANCE RISK MANAGEMENT

11 -1 –due to the organizational structure of bank and scope and volume of its activities, it is essential to design a system for the compliance risk management with the following details. This charter or system must involve compliance risk management programs, procedures and continuous educational programs of compliance.

11 - A) Identification of Compliance Risk

11-2- identifying compliance risk to understand the laws and regulations and designing and creating data base of all regulations, circular-letters & directives & also designing and creating data base containing informations such as money laundering suspects, offenders (forgers and swindler) ,international police, international sanctions, prohibition declared persons on behalf of official authorities such as central bank, department beneficiaries, relevant persons, bank non-current demands, dishonored cheques, the ratio of debts and currency obligations to currency assets, capital sufficiency ratio, currency open status ratio, fixed net assets ratio, amount of bank investments in the Stock Exchange and Non- Stock Exchange Companies and ... by using warning method in data base.

11-3- Recognizing compliance risks related to the customers, products and services, staff and organizational procedures by preventive approach.

11-4- Ranking and prioritizing compliance risks after identifying them.

11-B) Assessment and Measurement of Compliance Risk

11-5- Grouping laws, regulations and standards, due to importance degree of observing them, in the manner that we can evaluate and measure more important laws, regulations and standards easier, because violating them leads bank to more risks and losses. Information about evaluation and measurement of compliance risk, must be reported to the managing director and the board of directors in the status of compliance risk change.

11-6- Compliance risks studied, monitored and measured in terms of occurrence probability and influential level during the time and their indexes determined.

11-7- Evaluation techniques of compliance risk determined & performed based on the type of risk.

11-C- Controlling & decreasing Compliance Risk:

11-8- Controlling & monitoring compliance risk, through visiting, using performance indexes & observing data bases.

11-9- Designing compliance risk control systems such as customer identification, whistleblower systems & ... also providing suggestion regarding systems (business processes management, complaints management & ...) which have relation with compliance risk management.

11-10- to decrease the losses resulting from compliance risk, the occurrence probability of events that are influencing this risk should decrease. Thus we should strengthen the bank internal control system through recognition of existing failures & fixing them and/or taking amending action, to decrease the compliance risks.

11-11- Getting assurance of performing processes & policies information relating to decrease of compliance risk in the bank.

11-D) Monitoring & Reporting the Compliance Risk

11-12- Key indexes of risk (KRI), Key indexes of violation (KBI), Key indexes of operation (KPI) relating to clients affairs compliance, providing services & products, ways of providing services inside & outside of the country, procedures, contracts & files in the bank must be extracted and their information must be gathered.

11-13- Periodical and comprehensive examinations of compliance risk must be taken place regularly.

11-14- compliance risk status must be reported monthly, each three months & annually to managing director & the board of directors.

11-15- performance report (intentional and unintentional violation of laws, regulations & standards by employees) of bank executive departments in the field of compliance should be advised annually to managing director and business managers.

11-16- the results of Non-observance of laws, regulations and instructions which caused filing a lawsuit against the bank, should be performed to public in annual report.

11-17- important cases of violating laws, regulations and standards which caused legal & supervisory punishments, important losses and damaging good reputation of credit institution must be reported promptly to managing director and the board of directors.

11-18- methods & procedures of receiving reports relating to non-compliance with laws, regulations and professional & international standards and bank's ethics chart from each department inside and/or beneficiaries outside of bank should be compiled.

11-19- The reports must contain informations regarding the origin of event, risk severity, bank obligations against it and providing solution to tack amending action and preventing re-occurrence.

ARTICLE 12 – CLARIFICATION & CONTACT TO BENEFICIARIES & SUPERVISOR AUTHORITIES

12-1- Disclosing mechanisms relating to establishing and implementing the bank corporate governance in the bank annual performance report.

12-2- Disclosing employment policy to elect the board of director's members and getting assurance of suitable variety of their skills, backgrounds & viewpoints in bank's annual performance report.

12-3- Disclosing the information of the board committees, number of sessions and the summary of their performance in bank's annual performance report.

12-4- ensuring information transparency, (comprehensiveness, relativeness and & timely, trustable, comparable & being important) submitted to supervisory authorities.

12-5- ensuring clarification of work stages & documents and forms required by the customers.

12-6- ensuring systematic and transparent transactions, tenders, auctions.

ARTICLE 13 – AUTHORITIES OF COMPLIANCE & CLARIFICATION DEPARTMENT

13-1- Compliance and clarification department should have unlimited and prompt availability to the bank's entire information and activities. This matter include all banks documents, evidences, information and systems and also accessibility to the employees, managing director, senior managers, board of directors and compliance and clarification committee.

13-2- Compliance and clarification department while receiving a case of non-compliance and/or consider the probability of high compliance risk must examine the matter precisely & in case of need must recruit an expert from outside of bank.

13-3 – Compliance and clarification department has the right of expressing freely and disclosing its findings for the senior managers & compliance & clarification committee.

ARTICLE 14 – INDEPENDENCE AND ORGANIZATIONAL STATUS OF COMPLIANCE DEPARTMENT

14-1- Compliance and clarification department must ensure conformity of all affairs relating to bank's departments with laws, regulations and professional standards and bank's ethics chart and managing the relevant risks. The Compliance and clarification department independence of all bank's departments either Inspections, Internal audit, anti-money laundering and Risk management is necessary, thus be able to achieve its mission without facing any internets conflict.

14-2- Compliance and clarification department should have official status in bank organizational structure which should be in proportion to volumes of activities, organizational structure, and professional human resources.

14-3- Compliance and clarification department is directly under management of managing director and also should be responded to the board of directors.

14-4- Compliance and clarification department should work concentrated which means its personnel merely work in this department and they don't work in executive departments at all.

14-5- compliance & clarification department staff should access to employees of other departments and also required information for performing their responsibilities.

14-6- All executive departments of bank, are obliged to cooperate with the compliance and clarification department.

14-7- The senior management is obliged not to use compensation tools to impress the management and employees of the compliance and clarification department.

14-8- Paying reward to compliance department staff from bank executive departments revenue is prohibited, which their performance is being evaluated by compliance department.

14-9- to perform duties and responsibilities effectively and correctly by compliance and clarification department staff, should provide suitable & independent environment, sufficient resources such as human and financial resources and suitable compensation in institute's budget.

14-10 –compliance department is a specialized and interdisciplinary department in the bank thus, its staff should have required internal and external training courses
With the aim of developing organizational knowledge, being able to perform assigned mission and achieving the bank goals.

ARTICLE 15 – INTERACTIONS OF COMPLIANCE & CLARIFICATION DEPARTMENT WITH OTHER DEPARTMENTS

15-1- Inspection and Internal audit departments must perform their compliance risk findings to Compliance and clarification department.

15-2- Compliance and clarification department should receive reports & finding of internal departments including inspection, anti-money laundering, internal audit & legal inspections and independent auditors & update procedures and programs of compliance risk management.

15-3- Compliance and clarification department should perform relevant compliance risk findings to risk management department for compiling in operational risk calculations of the bank.

15-4- Compliance and clarification department should refer the important non-conformities to inspection management thus inspection procedures will be carried out about them.

15-5- Inspection department should perform its activities in the way that cover the important compliance risks periodically, cooperate with the Compliance and clarification department. Compliance and clarification department should complete the inspection procedures and its checking lists in periodically inspections for better covering the compliance risk.

15-6- in the case of observing any discrepancy in the directives and notified circular-letters with the laws & regulations, Compliance and clarification department declares the matters to organization and methods improving department to amend them.

15-7- Regarding performance monitoring of bank departments and due to the importance of subject & accuracy that should be taken in the field of observing the laws & regulations, all bank departments must have especial interactions in this regard.

15-8- to ensure the conformity of branches operations to the laws and regulations, Compliance and clarification department representative visits the branches periodically without prior notice.

ARTICLE 16 – AUDITING OF COMPLIANCE & CLARIFICATION DEPARTMENT

16-1- compliance and clarification department Auditing is performed by an independent auditor (external auditor).

ARTICLE 17 – INCENTIVES AND FINES

17-1- If managers and employees have extra-ordinary effort in line with promoting the standards and professional ethics of this charter and also have cooperation in identifying and discovering the important cases of not observing compliance requirements which can seriously damages the bank reputation, and/or preventing a violation occurrence, will receive proportionate incentives such as promotion priority or cash payment.

17-2- If bank staff don't observe the compliance requirements, senior management will take proportionate amending and disciplinary actions including administrative punishment, cooperation termination and/or reference to judicial authorities to trail.

This charter includes 17 Articles and 123 clauses that has been approved by the board of directors of Tourism Bank on date of And immediately after approving is binding on all managers and employees of Tourism Bank. Any amendment of this charter should be confirmed by the board of directors of the bank after reviewing of compliance and clarification department.

Laws, Regulations and Standards (Related to Bank Activities)

A:

1. Constitution
2. Sharia Laws (Famous Jurists)
3. Comments of the Guardian Council
4. Leadership Orders for: 1. General policies of System 2 - Vision Document
5. Normal rules
6. General Council Opinions of the Supreme Court (Procedural Unity Orders)
7. General Court opinions of Administrative justice
8. General Court opinions of Administrative justice, which ensures the cancellation of one of the previous Central Bank Circulars or Council Money and credit Opinions

B:

1. Banking rules (monetary and banking law, Unprofitable banking operations, etc.)
2. Cabinet approvals
 - approvals and regulations (a) • approvals based on law b) regulations not based on particular law
 - Decisions
 - The decision of the President Special Representative
 - Circulars
3. Approval of Money and Credit Council
4. Circulars of Central Bank offices
5. Instructions issued by central bank offices
6. Circulars issued by the central bank's management

C:

1. Head of the Central Bank orders
2. The decisions of the Central Bank Board of Directors
3. The Commission approvals of the Central Bank (after head of Central Bank confirmation)

D:

1. Five-year Development Plan Terms
2. The annual budget law
3. Policy – Supervisory package (annual monetary – credit policies)

E:

1. Appropriate provisions for existing councils
2. currency Savings Account Board of Trustees decisions

F:

1. Decisions of mutual working groups that at least one of its members is head of the central bank, and the approval of that working group is required According to the head.

Z:

1. Approvals of the General Assembly of the Banks
2. Approvals of The Legal Commissions of the Banks (for guidance only)
3. Approvals of the Supreme Council of Banks (Opinions before liquidation which are still valid)
4. Coordinating council of banks (for informing purposes only)

H:

- 1 - Accounting and Auditing Standards issued by the Audit Institute (to the extent that are required for banks or required for banks in different cases based on approvals of the central bank)
2. The standards and guidelines of the international financial organizations to establish a united procedural framework for banking matters, including the Ball Committee IMF- And the World Bank (to the extent that is required for banks or is Required based on the approvals of the Central Bank in different cases for banks)
3. Alliance Rules of the International Chamber of Commerce (ICC) to the extent required for banks, such as 600 UCP

I:

- 1 - Conventions
2. Resolutions of the United Nations Security Council
3. Treaties
4. Memorandum of understanding (MOU)
5. AML
6. CFT
7. The decisions of the global organizations (if Iran is a member and their decisions are binding), for example E-Ticket Issue and "IATA" recommendation
8. Reciprocity observance in international interactions
9. Observance of financial penalties and fines of international tribunals against convicts, including countries and individuals

1. Integrity Risk
2. Lines of defense
3. Including money laundering and terrorism financial supplying
4. Including disclosure of confidential and secret information, manipulation in markets and transactions with final information
5. Clause 35 Basel Compliance Guidelines
6. Clause 47 of Basel Compliance Guidelines
7. Clause 10 Article 7 Circular-letter of Central Bank
8. Clause 37 Basel Compliance Guidelines
9. Clause 153 of Basel Company Governing Guidelines
10. Clause 153 of Basel Company Governing Guidelines
11. Clause 5 of Basel Improving Clearness in Banks Guidelines
12. Clause 2 Article 6 circular-letter of Central Bank (guidelines for effective compliance risk management)