

April 15, 2024

NBFIRA 3/3/10-I (98)

To: AMLCOs/Principal Officers - Non-Bank Financial Institutions

**A MODEL POLICY FOR ANTI-MONEY LAUNDERING AND COUNTERING
FINANCING OF TERRORISM AND PROLIFERATION**

1. In line with the Non-Bank Financial Institutions Regulatory Authority's (the Authority) ongoing commitment to enhance the effectiveness of anti-money laundering, combatting the financing of terrorism and proliferation (AML/CFT/P) measures, the Authority hereby disseminates the attached **AML/CFT & P model policy**.
2. This model policy aims to provide comprehensive instructions/guidance and methodologies to assist Small, Medium and Micro Enterprises in documenting a thorough and effective AML/CFT&P policy. If any language does not adequately address an entity's business condition in any respect, NBFIs are required to have a tailor-made version of their specific institutional frameworks, operations and identified risks.
3. NBFIs may refer to the guidance note **Documenting a policy for Anti-Money Laundering / Combatting the financing of Terrorism and Proliferation** for further guidance.
4. Kindly contact the AML/CFT Department at amlcft@nbfira.org.bw for further clarification.

Yours sincerely



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