

FREQUENTLY ASKED QUESTIONS on AML/CFT/CPF

1. What is Money Laundering?

Money Laundering is the process by which illegal funds and assets are converted into legitimate funds and assets.

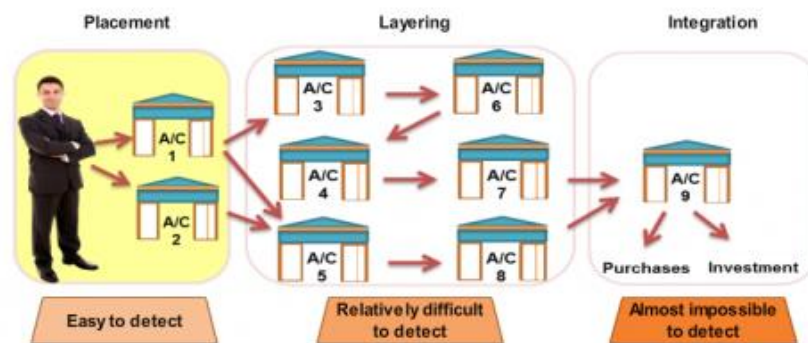
2. What is the current scale of Money Laundering worldwide?

Measuring the current scale of money laundering is extremely difficult. the United Nations Office on Drugs and Crime (UNODC) has estimated that the annual amount of money laundered worldwide is equivalent to 2–5% of global GDP, approximately \$800 billion to \$2 trillion in current U.S. dollars.

3. What is the process of money laundering?

Money laundering works in following three stages.

1. **Placement:** Illegal funds or assets are first brought into the financial system. This placement makes the funds more liquid. Money launderers place illegal funds using a variety of techniques like, depositing cash into bank accounts or purchasing insurance products and using cash to purchase assets.
2. **Layering:** To conceal the illegal origin of the placed funds and thus make them more useful, the funds have to be moved, dispersed and disguised. This activity is known as “layering”. At this stage, money launderers use many different techniques to layer the funds like, using multiple banks and accounts, having professionals act as intermediaries and transacting through corporations and trusts. This helps the launderers to disguise the origin of the funds.
3. **Integration:** The last stage of the money laundering process is called “integration”. The “cleaned” funds can now be made available for investment in legitimate or illegitimate businesses. Thus, the original “dirty” money has achieved the appearance of legitimacy.



4. What is Anti Money laundering (AML)?

Anti Money Laundering (AML) refers to a set of procedures, laws and regulations designed to stop the practice of generating income through illegal actions.

5. What is Terrorist Financing?

Terrorism financing refers to activities that provide financing or financial support to individual terrorists or terrorist groups.

6. What is Combating Financing of Terrorism (CFT)?

Combating the Financing of Terrorism (CFT) involves investigating, analyzing, deterring, and preventing sources of funding for activities intended to achieve political, religious, or ideological goals through violence and the threat of violence against civilians.

7. What is Proliferation Financing?

Proliferation financing is defined by the FATF as the provision of funds or financial services used for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations.

8. What is combating of proliferation financing (CPF)?

Combating proliferation financing (CPF) refers to efforts to prevent and disrupt the financial support of the proliferation of weapons of mass destruction (WMDs), including nuclear, chemical, and biological weapons. It involves stopping the flow of funds, resources, or financial services that could be used to develop, produce, acquire, or transport such weapons.

9. Why is AML/CFT/CPF important?

AML, CFT, and CPF are not just financial regulations, they are crucial for global security, economic stability, and trust in financial institutions. Strong enforcement ensures a safer financial system, deters crime, and prevents illicit funds from being used for terrorism or WMD (Weapons of mass destruction) proliferation. AML/CFT is important for following reasons:

- To protect the financial system from criminal exploitation;
- To prevent economic and political instability;
- To strengthen global trade and investment;
- To enhance national security and public safety;
- To meet international obligations and avoid sanctions;

10. Who is responsible for AML/CFT/CPF activities in financial institutions?

Each and every individual who works in the Banks and Financial Institution is responsible for AML/CFT activities.

11. Who enforces the AML/CFT/CPF regulations in Nepal?

Government of Nepal enforces the AML/CFT/CPF regulations in Nepal.

12. What is Financial Information Unit (FIU)?

FIU is the Financial Information Unit (established on April 21, 2008 pursuant to Section 9 of the Assets (Money) Laundering Prevention Act, 2008 within Nepal Rastra Bank (the Central bank) as an independent unit in order to work against the money laundering and terrorist financing activities. It is the financial intelligence unit of the State of Nepal. It is the central, national agency accountable for receiving, processing, analyzing and disseminating financial information and intelligence on suspicious money laundering and terrorist financing activities.

13. What is Shell Bank/Shell Entity?

Shell Bank/entity shall mean any bank or entity, which has no physical presence in the country in which it is incorporated, licensed or located, and which is not affiliated with a regulated financial services group that is subject to effective consolidated supervision. For the purpose of this clause, presence of local agent or junior level staff does not constitute physical presence. Shell banks/entities in themselves may not be illegal as they may have legitimate business purposes. However, they can also be a main component of underground activities, especially those based in tax havens.

14. What are the sources of illegal funds?

There are many sources of illegal funds. Major sources are as below:

- Participation in an organized criminal group, racketeering;
- Terrorism, including terrorist financing;
- Trafficking in human beings and migrant smuggling;
- Sexual exploitation including sexual exploitation of children;
- Illicit trafficking in narcotic drugs and psychotropic substance;
- Illicit arms trafficking;
- Illicit trafficking in stolen and other goods;
- Corruption and bribery;
- Fraud;
- Counterfeiting currency;

- Counterfeiting and piracy of products;
- Environmental crime;
- Murder , grievous bodily injury;
- Kidnapping, illegal restraint and hostage taking;
- Robbery and theft;
- Smuggling (including in relation to customs and excise duties and taxes);
- Tax crimes (related to direct and indirect taxes);
- Extortions,
- Forgery;
- Piracy;
- Insider taking and market manipulation

15. What is Customer Due Diligence (CDD)?

Customer Due Diligence (CDD) is a process of identifying and verifying a customer who is trying to maintain business relationship or has already maintained such relationship with the bank. It includes major activities like sanction screening, identifying PEPs and PEPs associates, identifying beneficial owner/ultimate beneficial owner, categorizing the customer under different risk category, conducting ongoing due diligence, monitoring and reporting etc.

Know Your Customer (KYC) is a part of CDD process which is carried out at the beginning of a customer relationship to identify and verify the customer.

16. What are the cases where accounts of customer cannot be opened?

- In cases of benami/fictitious/blank/alphanumeric character name.
- In case branch staffs cannot apply CDD measures due to lack of CDD information from the customer.
- In case relationship is with shell banks/shell companies
- Sanctioned person/entities (UN, EU, OFAC, HMT list)
- In case relationship is with sanctioned countries such as Cuba, North Korea, Syria, Iran, Certain parts of Ukraine (Donetsk, Luhansk and Crimea) and Russia.
- Blacklisted customers

17. What is the mandatory information/documents to be obtained for customer identification and verification?

Natural Person/s

1. Legal name;
2. Permanent and current mailing address;
3. Mailing address of current working organization;
4. Date of birth and gender;

5. Full name of Grandfather, Father and Mother;
6. National Identity Card
7. In case of Nepalese citizen, Citizenship copy or Election voting identification card or driving license or Passport number with issued date, issued place and expiry date;
8. In case of those Nepalese citizens who have not obtained the citizenship certificates, recommendation letter issued by the local government.
9. In case of foreign nationals, passport number, issued date issued place and validity;
10. In case of Indian citizens who do not have passport, legal certificate verifying Indian citizenship with certificate number, issued date, issuing authority and place;
11. In case of the refugee, identity card issued by government and international authorities with identity number, issued and expiry date and issued place.

Legal Person/s

1. Name of the legal person/s;
2. Detail information of registered address or business address with phone number, email address, website or other mailing address, if any;
3. Legal entity and nature of business;
4. Registration certificate, license, certificate to commence business, renewal certificate with issued date, expiry date, issuing authority and issuing country;
5. Registration and approval certificate of business, if any, required as per the nature of the entities;
6. Permanent Account Number (PAN) certificate;
7. Personal details of Board of Directors or Management Committee or such higher level committee if any;
8. Personal details of proprietor or partners or shareholders subscribing 10% or more shares of the company;
9. Personal details of account operator and
10. In case a company holds 15% or more shares of another company, personal details of shareholders subscribing 15% or more shares of the former company.
11. Share lagat from office of company registrar.

Legal arrangement:

1. Name of legal arrangement, main objectives and functions;
2. Registration or incorporation certificate, country of its operation and its address, contact number, email, website or any other detail contact address;
3. Approval certificate or License and approval letter for transaction, renewal certificate, date of issue, validity, particulars of issuing authority and issuing country;

4. Name, permanent address or current contact address of trustee, controller, protector or settler;
5. Permanent Account Number or such certificate issued by government entity for taxation purpose;
6. Name and address of beneficiary and
7. Personal details of account operator.

18. When to identify or verify the customers?

- While establishing a banking relationship;
- While opening the account;
- While transferring fund through wire transfers
- Whenever the Bank feels that it is necessary to obtain additional information from the existing customers based on the conduct or behavior of the account;
- When the bank sells third party products as an agent;
- When high risk customer/s and politically exposed person/s conduct each transaction/s.
- When the bank has a doubt about the authenticity/veracity or the adequacy of the previously obtained customer identification data;
- Customer identification shall also be carried out in respect of the non-account holders approaching the bank for high value one-off transaction/s as well as any person or entity connected with a financial transaction which can pose significant reputational or other risks to the Bank.

19. What is risk based CDD?

Based on the risk profiling of the customers, the Bank adopts following 3 types of CDD.

1. Simplified CDD
2. Standard CDD
3. Enhanced CDD

Simplified Customer Due Diligence

Simplified CDD is the lowest level of due diligence. This is implied to the customer with low risk category. Simplified Account Opening/KYC form is used to obtain information of such customers.

Standard Customer Due Diligence

Standard CDD is standard level of due diligence. This is applied to the customers in general or in medium risk or those who do not fall under high risk or low risk category. Standard Account Opening form/KYC form is used to obtain information of such customers.

Enhanced Customer Due Diligence

Enhanced CDD is highest level of due diligence applied for high risk customers. It refers to obtaining additional information of the customer while opening the account or updating the KYC information and monitoring the transaction/activities post onboarding. Additional information includes details of occupation/business, source of fund, source of net worth, statements/documents as evidence etc. ECDD form is used to obtain additional information of customers and ECDD internal observation form is used to monitor annual transaction/activities of customer by respective branch offices.

20. When to update/review KYC?

KYC information of all the customers shall be updated on a continuous basis. The Bank shall apply risk based approach to update the information of its customers in the core banking system as well as in terms of documentation. KYC information of the customers shall be updated on the basis of following:

Periodic Basis

- High risk customers: To be updated at least once a year.
- Medium risk customers: To be updated at least once in 3 years.
- Low risk customers: To be updated at least once in 5 years.

Trigger Basis

The bank shall ensure that KYC of customers is updated on an immediate basis in case following trigger events are materialized:

- CDD process is not complete,
- KYC information is not complete or missing in the Account Opening/KYC form,
- Transactions/behavior of the customers seems suspicious,
- Changes in customer's information like occupation, annual income, and annual turnover, present address etc.
- Doubt about veracity or accuracy of the previously obtained customer identification data.

21. Who fall under high risk category?

As per the AML/CFT Policy and Procedures, following customers fall under high risk category

- Customers whose profiles match to the PEPs, investigation, adverse media list of AML system, grey list "Jurisdiction under Increased Monitoring" and blacklist "High risk Jurisdiction Subject to a Call for Action" as designated by FATF that are duly confirmed by the compliance department.

- Customers who do not fall directly under high risk category at an individual level but whose aggregate risk score (based on different risk criteria) crosses or exceeds threshold high risk score.
- Customers who belong to the following industries
- Antique dealers (individuals and entities), Jewelers and precious metals,
- Saving and Credit Cooperatives,
- Money service bureaus/ Remittance Company /Money Transfer/Money Exchange House,
- Share broker firm/stock dealer companies,
- Guthi,
- Trusts, NGOs, charitable organizations receiving domestic or foreign donations,
- Entities with high cash inclination
- Dealers in arms, Casinos, Bullion dealers including sub dealers & jewelers,
- Business of precious herbs and medicines,
- Real estate agents,
- Unregistered funds
- High net worth customers:
 - Individual customer whose annual deposit in saving account is equal to or more than NPR 50.00 mil.
 - Customers who hold prominent position in business, also known as business tycoons and
 - Corporate leaders.
 - Customer suspected to be involved in offences related to money laundering and terrorism financing.
 - Suspicious transactions/activities reported customers.
 - Customer under investigation or prosecution or convicted.
 - Customer with suspected beneficial owner other than the account holder.
 - A multilayered entity
 - Politically exposed persons (PEPs), domestic, international and foreign PEPs, their family member and person associated with them.
 - All account of customers domiciled in high risk countries as categorized by FATF.
 - FATCA declared customers.
 - Customer or transactions related with the countries listed as grey list and black list by FATF.
 - Non Residence
 - Accounts opened through online channel where physical verification is pending.
 - Accounts with High value wire transfer
 - Where there is one-time transaction: Amount equal to or above 50 lakhs
 - Cumulative wire transfer in a fiscal year: Amount equal to or above 5 crores

22. Who fall under low risk category?

Customers who do not fall under high risk account and

- Accounts of pension holders
- Social security accounts
- BFIs and Sansthan accounts
- People belonging to lower economic strata of the society with actual annual turnover in account less than NPR 1 Lakh.
- All accounts pertaining to the Government of Nepal, Governmental bodies/Corporations/Companies/Organizations, Joint ventures with Government, Regulators, Financial Institutions, and Statutory Bodies.
- Accounts opened under “Kholau Bank Khata Abhiyan 2076” of Government of Nepal.

In case of following cases, the risk category of the customer shall be migrated from low risk to high/medium risk category depending upon the nature of transaction.

- If the customer deposits/transfer fund into the pension holders accounts and social security accounts to the effect that it no longer remains a single way credit account and/or
- If the annual turnover from the account exceeds 1 lakh.

23. Who fall under medium risk category?

All other than those classified as high risk and low risk shall be classified under medium risk category.

24. Who are Politically Exposed Persons (PEPs)?

PEPs means politically exposed persons. It includes domestic PEPs, Foreign PEPs and International PEPs.

Domestic Politically Exposed Persons (PEPs) means individuals who are or have been entrusted domestically with prominent 5 public functions. For example The President, Vice-President, Prime Minister, Chief Justice, Speaker of House of Representative, Chairperson of National Assembly, Chief of State, Council of Ministers, Chief Ministers, Members of Federal Legislature, Members of Constitutional Bodies, Speaker of State Assembly, State Council of Ministers, Officers of Special Class or equivalent to Special Class or above Special Class of Government of Nepal, Judges of Supreme Court and High Courts, Deputy Speaker of Provincial Assemblies, Members of Provincial Assemblies, Central Committee Members Of National Level Political Parties, Chiefs And Deputy Chief of District Coordination Committees, Mayors and Deputy Mayors of Metropolitan Cities, Sub Metropolitan Cities And Municipalities, Chairperson and Deputy Chief

of Rural Municipalities and Higher Level Office Bearers of Institution partially or fully owned by the Government of Nepal.

Foreign Politically Exposed Person: Foreign Politically Exposed Person means the individuals who are or have been entrusted with prominent public functions by foreign country, for example Head/s of the Nation, Head of the Government, Senior Politician, Central member/s of National level political party, Senior Government, Chief Administrative Officer, Chief Judicial or Military Official, higher level office bearers of State owned Corporations of a foreign country.

International Organizations Politically Exposed Person: It means the persons who are or have been entrusted with a prominent function by an international organization, refers to members of senior management or individuals who have been entrusted with equivalent functions, i.e. directors, deputy directors and members of the board or equivalent functions.

25. What is STR?

STR means suspicious transaction report. Suspicious transactions are those transactions that deviate from the profile, characteristics and usual transactions pattern, transaction reasonably suspected to have been conducted with the purpose of evading the reporting and financial transaction conducted using fund alleged to be attributable to predicate offences. STR is a process of monitoring potential suspicious transaction/activity and reporting to FIU Nepal with required information/documents within 3 days upon confirmation. Potential suspicious transactions are flagged in AML system under different rules. Branch offices are also required to inform central compliance for potential suspicious transaction/activities.

Suspicious transactions should be reported within 3 days of arriving at the conclusion that the transaction is suspicious.

26. What are STR triggers?

- **Cash:** Cash transactions conducted in an unusual amount; relatively small amount but with high frequency; transactions conducted by using several different individual names for the interest of a particular person; purchase of several insurance products in cash in a short period of time or at the same time with premium payment entirely in a large amount and followed by policy surrender prior to due date and purchase of securities by cash, transfer, or checks under other person's name.
- **Economically irrational transactions:** Transactions having no conformity with the initial purpose of account opening; transactions having no relationship with the business of the relevant customer; transaction amount and frequency are different from that of normally conducted by the customer; receipts/payments of funds made by using more than one (1) account, either in the same name or a different one; fund transfers using the account of reporting entities' employee in an unusual amount; if multiple inward or outward

remittance transaction is conducted with the person from the country or region where terrorist organizations operate.

- **Fund Transfers:** Fund transfers to and from high-risk offshore financial centers without any clear business purposes; receipts of fund transfers in several phases and once accumulated the funds are subsequently transferred entirely to other account; receipts and transfers of funds at the same or approximately the same amount and conducted in a relatively short period (pass-by).
- **Behaviors of the Customer:** Unreasonable behaviors of the relevant customer when conducting a transaction (nervous, rushed, unconfident, etc.); unusual curiosity about internal system, control and reporting; customer/prospective customer gives false information with respect to his/her identity, sources of income or businesses; Customer/prospective customer uses identification document that is unreliable or alleged as fake such as different signature or photo; customer opens account for a short period.

27. How to identify suspicious transaction/activity?

Suspicious Transaction/activity means transaction/s that

- Gives rise to a reasonable ground of suspicion that it may involve proceeds of an offenses specified by the prevailing law/s, regardless of the value involved;
- Seeks to conceal or disguise the nature or origin of funds derived from illegal activities;
- Appears to have no any economic rationale or bona-fide purpose;
- Appears to be in circumstances of unusual, or unjustified complexity;
- Appears to be deviated from profile, character and financial status;
- Seems to be made with the purpose of evading the legal and regulatory reporting requirements and
- Is found to be conducting or supporting the activities relating to terrorism/proliferation financing.

28. What is TTR?

Threshold transactions includes following transactions.

1. Credit and debit transaction of **NPR 1 million or more** in the account of any person or entity particularly of cooperative, private company, NGOs either by single or multiple transactions through any mode in a day.
2. Payment of remittance of **NPR 1 million or more** by any person or entity to any person or entity through single or multiple transactions in a day.
3. Exchange transactions of **NPR 5,00,000** or more provided to any person or entity through single or multiple transactions in a day.

Threshold transactions should be reported within **15 days** of such transactions.

29. Who is beneficial owner?

Beneficial Owner (BO) in case of natural account is a natural person/s other than the account holder who has ultimate control over the account. The beneficial owner uses other's account for his/her personal benefit which could range from tax evasion to any other predicate offence of money laundering.

30. Who is ultimate beneficial owner?

Ultimate Beneficial Owner (UBO) is a natural person who exercises ultimate control over a legal person, entity or an arrangement. For instance, if the significant proportions of shares of company say 'ABC' is held by another company say 'XYZ' then it shall be pertinent to get the information of major shareholders of company 'XYZ' and this process shall continue till the natural person who ultimately owns "ABC" is identified. Unlike in natural account, the legal shareholder could be the ultimate beneficial owner in case of a legal account but for that an in-depth analysis of ownership structure is required.

31. How long the transactions record of the customers should be kept?

Bank shall keep a record of every transaction, customer and beneficial owner data, and data obtained for the purpose of identification, risk analysis, monitoring and other related information along with the date, time and nature, KYC/CDD documents, correspondence with the customers, sources of fund, as well as all documents related to money laundering activities such as files on suspicious activity reports, documentation of AML account monitoring, etc. These records must be kept for a minimum of 5 years until other policy/act is prescribed for more time. In case of information/documents related to PEP customers, the record should be kept up to 10 years.

32. What is 'Sanction List' maintained in Trust AML?

A sanction list is a publicly or privately maintained list of individuals, entities, or countries that are subject to economic or legal restrictions imposed by governments, international organizations, or regulatory bodies. These sanctions can include trade restrictions, asset freezes, travel bans, and other penalties. RBBL has Trust AML system which maintains sanction lists of individuals and entities published in United Nations (UN) Sanction list, U.S. Sanction list (OFAC List), European Union (EU) Sanction list and UK's HM Treasury (HMT) sanction list.

33. Can we open accounts of the persons matched (true match) in the sanction lists of Trust AML?

The customer acceptance policy of the bank restricts to open the account of confirmed sanction person/entity.

34. What if anyone (in the list) has already opened account in the branch?

In such case, it is recommended to immediately block the account and report the same to FIU, Nepal for further actions.

35. What is FATF?

The Financial Action Task Force (FATF) is an intergovernmental organization established to combat Money laundering (AML), Terrorist financing (CFT) and Other threats to the global financial system.

36. What is meant by FATF Black List and Grey List countries?

The **Financial Action Task Force (FATF)** maintains two key lists (Black & Grey) to monitor countries with weak measures against **money laundering, terrorist financing, and other financial crimes.**

Black list countries: This list includes countries with ‘High-Risk Jurisdictions - subject to call for action’ that **fail to take adequate measures** against money laundering, terrorist financing and proliferation financing. These nations pose a serious risk to the global financial system.

Grey list Countries: This list includes countries with ‘Jurisdictions under increase monitoring’ are actively working with the FATF to address strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolve swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring.

37. Can we open accounts of the persons from/origin from the grey/list or black list nations?

Yes, we can open accounts of the persons from/origin from the nations, however, they should be categorized as High Risk Customers who are subject to ECDD and approval from senior management (i.e. DEO supervising Compliance Department) should be taken before opening the account.

38. What is meant by sanctions countries?

Sanctioned countries are nations subject to **economic, trade, military, or diplomatic restrictions** imposed by international organizations or individual governments. These sanctions are applied to **punish, deter, or pressure** countries involved in activities like, Human rights violations, Terrorism support, Nuclear weapons development, Aggressive military actions & Corruption or financial crimes.

39. What is comprehensive sanction?

Comprehensive sanctions prohibit transactions with a country's government and virtually all other transactions, including exports/imports, involving the sanctioned country. Comprehensive sanctions maintained by US (OFAC) are on countries listed below.

- Cuba
- Iran
- North Korea
- Russia
- Syria
- Certain parts of Ukraine (Crimea, Donetsk, Luhansk)

Since RBBL maintain correspondent banking relationship with the US banks, RBBL is restricted to do any transaction or maintain any relationship with these countries.

40. What is targeted sanction?

Targeted sanctions prohibit transactions with specified industries, entities, or individuals listed on different sanction list. RBBL has targeted financial list of UN, EU OFAC and HMT list.

41. Can we open new accounts of persons from/origin from Sanction Countries?

No, we cannot open new account of the persons from/origin from Sanction Countries listed by UN, EU, OFAC and HMT.

42. What are the major roles/responsibilities of branch manager related to AML/CFT/CPF?

- To ensure that branch staffs conduct customer due diligence procedures effectively and efficiently.
- To forward the report of unusual and suspicious transaction to Compliance Department.
- To implement or cause to implement the AML/CFT measures effectively and efficiently in branches.
- To respond to compliance notice issued by central office compliance department on a prompt basis.
- To act as a Compliance SPOC (Single Point of Contact) for all AML/CFT related compliance.

43. What are the major roles/responsibilities of employees related to AML/CFT/CPF?

- To carry out Know Your Customer/Customer due Diligence procedures effectively and efficiently during customers on boarding.

- To update the information of customers in core banking system and AML/CFT system as required.
- To conduct preliminary risk profiling of the customers before opening the account.
- To continuously monitor the transactions of high risk customers.
- To report suspicious transactions/behaviors of customers to compliance department.
- To inform/educate/aware the customers about the beneficial owner.
- To provide the information/documents asked by compliance Department in stipulated time.
- To prepare and provide reports to Compliance Department in stipulated time and as per the requirement.
- To implement the AML/CFT measures effectively and efficiently.

44. What is walk-in customers?

Walk-in Customer means a person who does not have an account based relationship with the Bank, but undertakes transactions with the Bank. The bank provides various services like remittance, foreign exchange etc. to walk in customers.

45. Is CDD conducted in case of walk-in customers?

Yes, walk-in customers should undergo the CDD process. Customer identification and verification process should be conducted in case of walk-in customers too.

46. What is tipping off?

Tipping off means telling the clients that his/her account is being monitored or informing the client that there is an element of suspicion on the transaction or disclosing the information to designate authority. When an institution identifies a suspicious transaction, the customer should not be “tipped off” or informed.

47. What are the penalties for non-compliance of AML/CFT?

- To fine from NPR 1 million to **NPR 50 million**
- To impose **full or partial restriction** on the business
- To suspend or **cancel registration/permission/license**
- To impose other appropriate **sanctions**.