Report On

Analysis of KYC Accuracy and Documentation Quality in Account Opening at Prime Bank's Mohakhali Branch.

By

Debaroti Chakraborty

22104006

An internship report submitted to the BRAC Business School in partial fulfillment of the requirements for the degree of Bachelor of Business Administration.

BRAC Business School

BRAC University

February 2026

© 2026. BRAC University

All rights reserved.

Declaration

I hereby declare that:

1. The internship report I submitted is my own original work while completing my degree at BRAC University.

2. The report does not contain any material previously published or written by a third party, except where this is appropriately cited through full and accurate referencing.

3. The report does not include any content that has been accepted, or submitted, for any other degree or diploma at a university or other institution.

4. I have acknowledged all the main sources of information I have used in completing this report.

Student's Full Name & Signature:

Debaroti Chakraborty

Student ID: 22104006

Supervisor's Full Name & Signature:

Abir Ahmed Choudhury

Senior Lecturer, BRAC Business School

BRAC University

Letter of Transmittal

Abir Ahmed Choudhury

Senior Lecturer,

BRAC Business School, BRAC University

Kha 224, Bir Uttam Rafiqul Islam Ave, Dhaka-1212

Subject: Submission of the internship report.

Dear Sir,

I feel privileged to submit my internship report titled "Analysis of KYC Accuracy and Documentation Quality in Account Opening at Prime Bank PLC" as a requirement for the completion of my Bachelor of Business Administration program at BRAC University. This report, based on my 3-month internship experience, presents my observations in Account opening and Know Your Customer Documentation (KYC) procedures, and compliance related documentation. On the basis of my analysis of 100 audited files and observations, this study points out the key operational issues, evaluates the accuracy of the KYC process of the Mohakhali branch, and provides recommendations on how to enhance compliance and client welcoming.

I am respectfully grateful for your wonderful guidance and support throughout my internship in the Fall session, 2025. I have tried my best to give the best input in this document so that it makes a comprehensive detailed report to you.

Respectfully,

Debaroti Chakraborty

ID: 22104006

BRAC Business School

Date: February, 2026.

Non-Disclosure Agreement

This agreement is made and entered into by and between **Prime Bank PLC.** (Mohakhali Branch) and **Debaroti Chakraborty** as a commitment of not disclosing any information that is confidential.

I, Debaroti Chakraborty, do agree to maintain full secrecy regarding any information gathered from Prime Bank PLC. and will not reveal any private information even after the completion of my tenure with this esteemed financial institution.

Organization's Supervisor Name & Signature

____

Mohammad Tashfin Khan

Senior Assistant Vice President & Head of Branch

Prime Bank PLC.

Student's Full Name & Signature

____

Debaroti Chakraborty

ID: 22104006

Acknowledgement

First the truth is, I’m deeply thankful to God, the one who gave me courage, clear thinking, and steady hands during these last four years of my BBA life plus the time working at the office. Every step forward came alive because of what he placed inside me, nothing more or less.

In addition, my gratitude stands short for how much Prime Bank PLC. 's support means - offering a chance to intern at their bank. Completing that internship there shaped more than just knowledge about finance; it built sharper skills over time. A deep thank you goes out to Mohammad Tashfin Khan Sir, leading Prime Bank PLC’s Mohakhali Branch as Senior Assistant Vice President. I want to convey my earnest gratitude to every Relationship Manager (RM) at that branch for their steady support and guidance. However, I want to specially thank the following RMs for their continuous guidance, practical help, friendliness and quiet inspiration between 9th November, 2025 and 7th February, 2026.

- ➢ Nelufa Yeasmin (Executive Officer).
- ➢ Ferdousy Jesmeen (First Assistant Vice President).
- ➢ Gopal Chandra Das (Senior Manager, FAVP).
- ➢ Dilip Kumar Nag (Executive Officer).
- ➢ Towsif Uddin Ahmed (Executive Officer).

I also convey my deepest gratitude to my academic supervisor, Abir Ahmed Choudhury, at BRAC Business School for his supercalifragilisticexpialidocious guidance, constructive and insightful feedback, and his kind encouragement during my research in the internship period at Fall 2025.

To conclude, I would like to express many thanks to the BRAC Business School and all of its wonderful teaching staff for their guidance and cooperation for the past four years in shaping my academic and professional life. The knowledge I learned and the skills I gained during these years were very much needed for being successful in this internship.

Executive Summary

This report explores the digging of Prime Bank PLC, particularly the Mohakhali branch, regarding KYC verification and documentation while opening new accounts. From November to February, I contributed to observe how the strict anti-money laundering regulations would actually cause the work to drag on. The security measures are quite strict, but the RMs were still able to open a stream of new customers every day, and to be honest, there were no major issues.

I began by examining 100 Account Opening Forms searching for the typical errors and omissions that tend to push people back to square one. My work was not simply to go through the figures, rather it was to recognize the underlying stories that tend to be hidden behind the errors. I observed the process as it happened, both on paper and on computer-based systems such as PRIME INTELLECT and T24. The truth is that it is surprising how easily mistakes can creep in when the bank is busy.

NID checks are usually quite smooth like 94%, because the automated system directly communicates with the Election Commission. But it gets complicated when it comes to obtaining additional financial statements. About 30% of the time, the tax statements such as e-TIN or PSR simply are not present. In one out of every five instances, there is no conclusive evidence available to trace the origin of the funds. In most cases, it is because people do not want to reveal that information, or because someone just misses a step. And to be frank, technology is not cooperating much. Only 20% of the technology available at the Mohakhali branch communicates with each other as they should, so they have to retype the same information, essentially asking for trouble. However, beginning these checks earlier in the internship did help reduce the rework rate of the branch by 12%, so that’s a positive.

To make onboarding smoother, the study suggests using the same checklists in every issuance center. That way, more things get done right the first time. It also says to bring in OCR tools for documents that are not NIDs, so there is less manual work.

Table of Contents

List of Tables

List of Figures

List of Acronyms

AML	Anti-Money Laundering
BFIU	Bangladesh Financial Intelligence Unit
CRAR	Capital to Risk Weighted Asset Ratio
CDD	Customer Due Diligence
CFT	Combating the Financing of Terrorism
CPC	Centralized Processing Center
EC	Election Commission
EDD	Enhanced Due Diligence
e-KYC	Electronic Know Your Customer
e-TIN	Electronic Tax Identification Number
ESG	Environmental, Social, and Governance
FTR	First-Time Right
KPI	Key Performance Indicator
LOI	Letter of Introduction
LCR	Liquidity Coverage Ratio
MSME	Micro, Small, and Medium Enterprises
MFS	Mobile Financial Services
NPL	Non-Performing Loan
OCR	Optical Character Recognition
PCB	Private Commercial Bank
PEP	Politically Exposed Person
PSR	Proof of Submission of Tax Return
RTGS	Real-Time Gross Settlement
RWA	Risk-Weighted Asset
TBML	Trade-Based Money Laundering

Chapter 1: Overview of Internship

1.1 Student Information

NAME	Debaroti Chakraborty
ID	22104006
PROGRAM	Bachelor of Business Administration
MAJOR/SPECIALIZATION	Finance
E-MAIL	debaroti.chakraborty@g.bracu.ac.bd

1.2 Internship Information

1.2.1 Period, Company Name, Department, Address

START DATE	9th November, 2025
END DATE	7th February, 2026
COMPANY NAME	Prime Bank PLC.
DEPARTMENT/DIVISION	Retail Banking
ADDRESS	MG SAM Center, 12 Mohakhali C/A, Dhaka-1212.

1.2.2 Internship Company Supervisor's Information: Name and Position

SUPERVISOR	Mohammad Tashfin Khan
DESIGNATION	Senior Assistant Vice President & Head of Branch
CONTACT NUMBER	+88 01730-320022
E-MAIL	tashfin.khan@primebank.com.bd

1.2.3 Job Responsibilities

During my internship at Prime Bank's Mohakhali Branch, I helped in filling up the forms for opening Savings, Current, and Payroll Accounts. Establishing a suitable customer account demanded rigorous attention to KYC documentation, and regulatory and legal compliance. My role was therefore to simultaneously safeguard the bank and assist customers with their banking needs. By properly verifying the identities of the customers (KYC), I ensured that Prime Bank was able to verify the identities of its customers, thereby ensuring that Prime Bank did not face any financial risks or failed to meet any regulatory requirements.

Apart from this, I assisted in many other organizational tasks at Mohakhali Branch, such as:

- ➔ I verified all the documents submitted by the customers, such as NID/Birth certificates, Utility bills (gas, water, electricity, and phone), and Salary certificates, etc.
- ➔ I captured substandard scans immediately, some were blank or distorted among them. Mismatches appeared, such as names, numbers or data being out of sync. Absent contact information was encountered more frequently than anticipated.
- ➔ I observed Real-Time Gross Settlement (RTGS) transactions at the Payment and Settlement Desk that provided me with insight into Bangladesh's financial ecosystem in the banking sector while helping Nelufa Ma'am in cheque clearing procedures at the Clearing Desk.
- ➔ I supported Ferdousy Ma'am with customer onboarding by facilitating the issuance of debit cards and chequebooks, while also maintaining records in substantial hardbound books.

1.3 Internship Outcomes

1.3.1 My contribution to Prime Bank's Mohakhali Branch

From November to February, I prepared and analyzed account opening documents for 100 new accounts meaning an average of 7-8 accounts per week. The documentation rework rate of the Mohakhali branch was decreased by an estimated 12% due to my proactive approach to quality control, particularly in verifying missing or unclear NID copies, inconsistent addresses, missing nominee details, and unclear source-of-funds explanations.

As an intern at the clearing desk, I dealt with almost 50 client inquiries regarding the return of cheques. In response to this, I explained to each client why their cheque had been returned. Since the procedures were crystal clear and I could give precise answers, most issues of the customers were resolved without needing follow-up calls or visits to the Mohakhali branch.

I always ensured that I gave my full attention to every detail while preparing or working on opening new accounts. I did not hurry through the KYC steps or ignore any minor errors. I made sure that the income level was correctly stated for each job title in the KYC information. The Branch Head and Branch Operations Manager recognized the effort that I put into my work and stated that I had surpassed the level of normal intern performance in helping to reach the goal of the Mohakhali Branch to be AML/CFT compliant.

1.3.2 Benefits to the Student

First, I observed how strict banking rules can easily upset customers. Heavy paperwork often made customers angry and sometimes stopped them from getting their money. I realized that following rules and laws does not have to make things hard for customers. I learned a way of balancing following rules and laws, and helping customers with their needs through past 3 months experience at Mohakhali branch, which can not be acquired by reading books.

I educated myself on how to handle risks by working directly at the Mohakhali branch. I evaluated the client's risks when they opened accounts. I learned to identify signs such as jobs and incomes that do not match, unclear sources of money, and connections to important people in their home countries.

Finally, I improved my speaking skills by communicating with many people at the branch, including the RMs and obviously the respected customers. I communicated with those customers who were upset as their documents were denied or their cheques bounced. This really boosted the way I speak now. I provided detailed explanations on regulatory updates clearly to senior leaders. Even when RMs were busy, I stayed focused and calm. As a result, It became easier to communicate with others during busy hours, especially between 10 AM and 4 PM.

1.3.3 Problems Faced

Working for Prime Bank PLC was a great experience indeed. However, there were time constraints as I got only three months for this thorough analysis of the data, and certain information I could not include in this report for firm confidentiality reasons.

Additionally, the most significant impediment to my professional development during this internship was Prime Bank's policy of denying interns access to any digital systems such as - T24, Prime Plus, Prime Intellect. Handling over 100 account opening forms by hand got pretty frustrating, especially since I was stuck with manual checks and old-school paperwork.

1.3.4 Recommendations

If Prime Bank PLC wants to make their Retail Banking Division’s internship programs better, here is what they should do:

- They should assign a dedicated Junior Internship Mentor or Coordinator who will give regular quick sessions to interns, breaking down the logic behind all those complicated banking procedures.
- They should grant interns controlled, supervised access to specific databases; such as “PRIME INTELLECT”, “Prime Plus” and “T24” core banking systems. This is my personal opinion that interns can often process data entry and verification faster, increasing overall branch productivity.
- Prime Bank should arrange regular structured batch workshops for interns in relation to KYC/AML and its ever changing legal dispensation including e-KYC, documentation for SME loan, technical fundamentals of contemporary payment systems like RTGS.
- They should include real-world case studies 'scenario based training exercises' that replicate: processing suspicious transactions and submitting STRs (Suspicious Transaction Reports), dealing with difficult clients or complaints, opening accounts from high risk individuals or firms and resolving discrepancies in documents against the clock.

Chapter 2: Organization Part

2.1 Introduction

Prime Bank PLC, a fast growing private sector bank with wide presence in Bangladesh, is present in both conventional and Islamic Banking. Located at Gulshan Avenue, Dhaka, the bank has a network of 149 branches and five sub-branches with robust digital banking offering to cater for its growing clientele comprising corporate, SME, and retail segments.

The chapter provided an in-depth look at Prime Bank as a financial institution, encompassing its corporate values, financial performance, vision, goal, and history and background. In this chapter, it is given focus on the bank's rules and how it runs to be sustainable. It shows how the bank's main goals and rules match the daily operations at the Mohakhali Branch which includes opening accounts and doing KYC paperwork. Understanding the connection is important for analyzing the KYC accuracy and documentation quality in Account Opening at Prime Bank PLC, which is the main topic of this report.

2.1.1 Objectives of Chapter 2

The objectives of this chapter:

- ➢ Present a detailed overview of Prime Bank PLC, containing its history, vision, mission, and organizational values.
- ➢ Describe Prime Bank's strategic priorities, core banking operations and services with giving importance on account opening and compliance processes.
- ➢ Assess Prime Bank's "Sustainability & Corporate Social Responsibility", and Management Practices.
- ➢ In order to evaluate Prime Bank's efficiency and stability, its financial performance and key financial ratios from the annual report (2024, 2023) are assessed.
- ➢ Conduct PESTLE analysis for analyzing Bank industry and SWOT analysis for competitive analysis.

2.1.2 Methodology

Secondary data for this chapter was collected from Annual Reports (2023 and 2024) of Prime Bank PLC, Bangladesh Bank guideline file (2020), and BFIU Report (2024). I employed a Mixed Method approach that is based on qualitative and quantitative analysis in the appraisal of institutional operations and financial performance.

2.1.3 Significance of Study

Knowledge of the organization and financial status of Prime Bank PLC is critical to put the internship experience in context. The chapter demonstrates the practical application of financial and compliance theory to practice. Additionally, the NPL ratio of the bank provides a trailing indication of past quality of KYC completeness and documentation accuracy where stringent initial vetting is the best defence against defaults upon credit and fake accounts.

2.1.4 Limitations

I experienced limitations in terms of limited access to sensitive financial data, concentration only on the Mohakhali branch, time-bound for extensive analysis, and restricted hands-on experience for few banking activities due to legal issues.

2.2 History and Milestones of Prime Bank PLC.

Prime Bank PLC was incorporated under the Companies Act of 1994, and its banking business started on the 17th of April, 1995 being the second-generation private sector commercial bank in Bangladesh. It has its headquarters in Gulshan Avenue in Dhaka. Today, the bank has become a leading financial institution in the country with a total of 149 branch offices, 5 sub-offices, and 153 ATMs. Among its domestic offices, “Prime Bank Investment Limited,” a subsidiary of Prime Bank PLC, is responsible for providing service in merchant banking, while the “Prime Bank Securities Limited,” another domestic office of the bank in Bangladesh, is responsible for conducting stock exchange and trading businesses. Similarly, the bank’s international offices are responsible for providing money transfer service and trade financing service in countries across the world and have an outreach of 580 correspondent offices in various countries of the world with 63 countries under its network (Prime Bank PLC, 2024).

The bank has conquered international recognition worldwide for its innovation and operational excellence in case of performance. In 2020, the bank received the award for ‘Best Bank in Bangladesh’ from Global Finance. Apart from this, the award for ‘Best Digital Bank’ shows a great level of recognition in terms of technological development and customer focus, as seen in Asiamoney awarding Prime Bank this year.

One of the major milestones in the corporate life of Prime Bank is the Business Model Restructuring and Centralization Project of 2014, which was focused on improving its internal systems and internal governance structures. This exercise enabled the Prime Bank to emerge as an entity with a futuristic vision, growth ambitions, sustainable development goals, and a culture of innovation – all of which have sustained its attention until now.

2.2.1 Vision

To be the most efficient and trusted private commercial bank in Bangladesh with high standards of capital adequacy, asset quality, management strength, profitability, and liquidity.

2.2.2 Mission

To transform Prime Bank PLC into an efficient, market-driven, and customer-focused organization with an effective corporate governance system. While the primary focus of FSC regulations is on policies and procedures, continuous improvement is encouraged, and in this direction, technology will find its way into all levels of operation.

2.2.3 Corporate Philosophy

The corporate philosophy of Prime Bank rests on four basic pillars that define its engagement with major stakeholders in society:

➢ **For Customers:**
To deliver courteous, efficient, and personalized services while constantly innovating and developing bank products that can address changing customer needs.
➢ **For Employees:**
Support the development of the employees by providing them with well-paying salaries, extensive training, and career advancement opportunities.
➢ **For Shareholders:**
Ensure a financially stable state by advancing sustainable profits, which provide a fair return on investment with proper risk management techniques.
➢ **For the Community:** To be a socially responsible corporate citizen by adopting and abiding by the national policy, ethical values, and best practices, adding substantially to the development of the economy and society in Bangladesh.

2.2.4 Strategic Priorities

Prime Bank PLC gives its utmost focus on the strategic considerations that are Sustainable Finance, Digital, and Inclusive Economic Development, ensuring high support to Cottage, Micro, Small & Medium Enterprise (CMSME) sectors, while concentrating on meeting net-zero emission targets by enhancing green & sustainability-linked finance options in facilitating renewable energies, eco-friendly practices, and sustainable agriculture, livestock, and fisheries practices.

Key strategic initiatives include further expanding CMSME and agricultural financing to enhance financial inclusion; accelerating digitalization to improve operational efficiency and customer satisfaction, and reducing carbon footprint; and incorporating Environmental, Social, and Governance (ESG) factors into risk management best practices. At the Prime Bank, important issues like health, labor conditions, and climate change are being tackled with international standards and guidelines by Bangladesh Bank (Prime Bank PLC, 2024).

Apart from its bank-related strategy, yet another strategy of SBI Bank entails taking capacity building programs in which CMSME entrepreneurs are made to undergo training in financial literacy, book-keeping, and digital marketing. SBI Bank's social responsibility lies in fulfilling the bank's objectives of contributing to educational and healthcare institutions through the Prime Bank Foundation. The strategy supports the climate goals of Bangladesh and ensures the profitable sustainability.

2.2.5 Product and Services

Wholesale Banking:

Funded Facilities	Non-Funded Facilities	Deposit Products	Services
• Working Capital • Trade Finance • Factoring • Work Order Finance • Re-finance Facility • Lease Finance • Bill Discounting • Invoice Financing • Supply Chain Finance • Green Finance • Shariah Based Financing • Project Finance • ECA Financing	• Import LC • Export LC • Letter of Guarantee • Documentary Collections • Open Account Imports • Shipping Guarantee	• Current Account • SND Account • Term Deposit • FCY Account • Shariah Based Deposit Products • Government Securities	• Cash & Liquidity Management Solution • Agency Service • Employee Banking • Debt Capital Market Solutions • Trade Financing Solutions • Treasury Products • Digital Banking • PrimePay • RemitPrime • Host to Host Solution

Retail Banking:

Loan Products	Deposit Scheme	Savings Account	Current Account
• Personal Loan • Auto Loan • Home Loan • Secured Loan/ Overdraft • Digital Loan • Credit Cards	• Prime Kotipoti DPS • Prime Millionaire Scheme • Lakhopoti Deposit Scheme • Double Benefit Deposit Scheme • Prime Monthly Income Scheme • Laksma Puron Deposit Scheme • Prime Deposit Premium Scheme • Prime Edu DPS	• Prime First Account • Prime Youth Account • Prime Women's Savings Account • Prime Savings Account • Prime Teacher's Account • Prime 50 & Plus Savings Account	• Prime Current Account • Prime Personal Retail Account

Fixed Deposit	NRB Banking	Foreign Currency
• Prime Fixed Deposit • Prime I-First FD • Prime Fixed Deposit Plus	• Non Resident Foreign Currency Deposit Account (NFCD) • Non Resident Taka Account • Diaspora Bonds • Prime Porijon Savings Account	• Resident Foreign Currency Deposit Account (RFCD) • Prime Freelancer • Foreign Currency Account • Prime OBU FC • Prime IBA FC Account • Prime OBU FC FD • Prime Atlas FC

CMSME Banking & Agriculture Banking:

Deposit Products	Loan/Investment Products	Agriculture Banking
Prime Business Account	Anchol Rin	Nabanno (for Any Agri-purpose Loan)
Prime Business MIS	Prime Sampad	Khamar (Farm/Non-Crop Loan)
MSME Fixed Deposit Receipt	Prime Chalti	Abad (Crop Loan)
MSME Special Notice Deposit	Prime Emarat	Hasanah Abad
Prime Business DPS	Prime Shombhabona	Hasanah Khamar
Prime Business Plus	Prime Shahaj	
	Prime Startup	
	Prime Dealer	
	Prime Shongjog	
	Cluster Financing	

Islamic Banking:

Deposit Account	Deposit Scheme	Investment Products
Prime Hasanah First Account	Prime Hasanah Kotipoti DPS	Hasanah Personal Investment (Asbab)
Prime Hasanah Youth Account	Mudaraba Millionaire Deposit Scheme	Hasanah Auto Investment (Burak)
Prime Hasanah Savings Account	Prime Hasanah Lakhopoti Scheme	Hasanah Home Investment (Manjeel)
Prime Hasanah Freelancer	Prime Hasanah Double Benefit Scheme	Hasanah Secured Investment (Quard/ Bai Murabaha/ HPSM)
Prime Hasanah Current Account	Prime Hasanah Monthly Income Scheme (PHMIS)	
Mudaraba Special Notice Deposit	Prime Hasanah Laksma Puron Scheme	
Prime Hasanah Women's Savings Account	Prime Hasanah Hajj Scheme	
Prime Hasanah Personal Retail Account	Prime Hasanah Term Deposit	
Prime Hasanah Teacher's Account	Prime Hasanah Deposit Premium Scheme	
Prime Hasanah 50 & Plus Savings Account	Prime Hasanah Edu DPS	
Prime Hasanah Porijon Savings Account	Prime Profit-First TD	
	Prime Hasanah Term Deposit Plus	
	Sadaqah Jariyah Account	

Figure 01: PRIME BANK PLC's products and services.

Prime Bank PLC provides a wide array of financial services and products within four segments: Retail Banking, which includes personal loans, deposit schemes, savings and current accounts, credit cards, and foreign exchange; Islamic Banking offers Shariah-compliant account facilities, deposits, and investments, as well as Hajj schemes; at the other end of the spectrum are CMSME and Agriculture Banking and Wholesale Banking segments, which include business accounts, loans for small and medium-sized enterprises, agricultural loans and specific products like Nabanno and Abad within Agric Banking; and Wholesale Banking includes working capital solutions, trade and factoring, treasury services, and online banking services like Prime Pay and Remit Prime. The bank's services cover individuals, businesses, and institutions. They are not just ticking boxes; they actually push for financial inclusion, fresh ways to serve people, and real economic growth.

2.2.6 Sustainability and Corporate Social Responsibility

Prime Bank PLC has shown utmost commitment to the dimensions of sustainability in the environment as much as in society via its Environmental, Social, and Governance principles, which form an integral part of its overall model for sustainability that incorporates elements such as green finance and capacity building in the context of climate targets for the country.

- **Green and Sustainable Finance:**

In its relentless pursuit to achieve a sustainable environment, Prime Bank had a green finance portfolio of BDT 18,513.82 million as of 2024. This green finance portfolio comprised a significant part of the entire finance portfolio, which was 9.72 percent. In a bid to ensure that its portfolio supported sustainability, the bank disbursed a total of BDT 12,267.04 million in green finance during the year, with the bank using 80 percent of this finance for energy-efficient machines and a further 13 percent in green and environmentally friendly establishments. In line with the established and advocated goal to finance sustainability, the bank disbursed a total of BDT 280,496.38 million in sustainable finance, forming a substantial part of its total portfolio, a whopping 80.48 percent, as evidenced by its commitment as a responsible bank in fostering a greener economy (Prime Bank, 2024).

- **CSR:**

The bank spent BDT 49.22 million through Prime Bank PLC and BDT 87.40 million through Prime Bank Foundation, amounting to BDT 136.62 million on social expenditure in 2024 (Prime Bank, 2024).

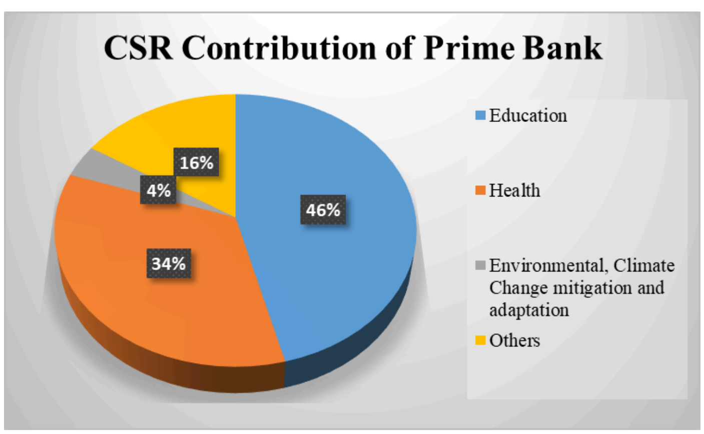


Figure 02: CSR contribution in 2024.

Education (46.57%), health (34.51%), environmental and climate change-related projects including adaptation and mitigation (3.61%), and other welfare programs (15.31%) are among the causes that benefited from these contributions. For instance, Prime Bank provided medical scholarships to underprivileged student athletes through the Prime Bank Pre-Paid Card Program, enhanced water filtration systems in Cox's Bazar District schools, and sponsored the national school cricket program.

2.3 Management Structure at Prime Bank

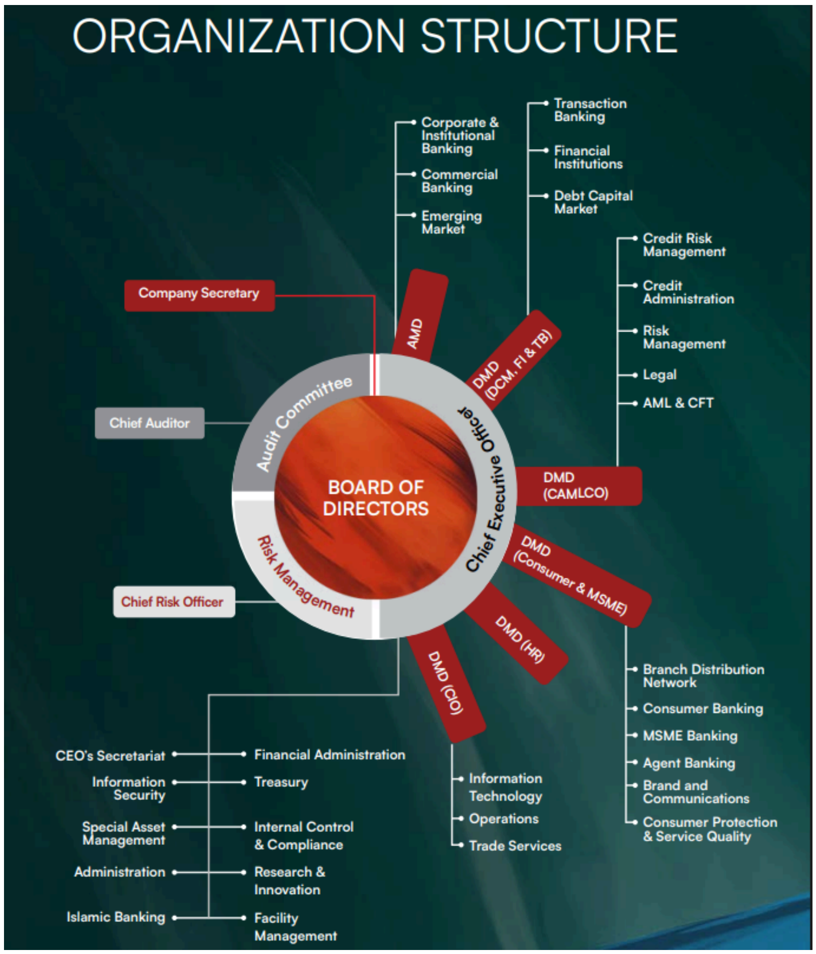


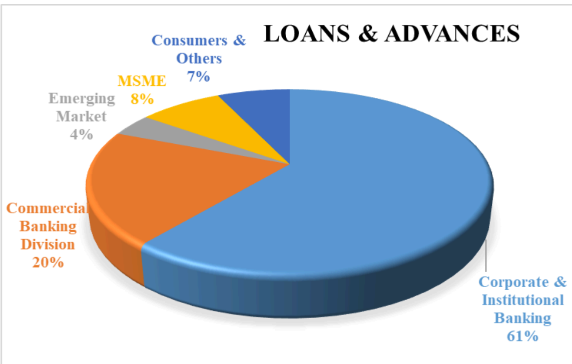
Figure 03: Organization Structure of Prime Bank (Prime Bank, 2024).

Prime Bank PLC follows a system of Centralized Management with its Board of Directors & CEO at the helm, while its various activities are handled by Deputy Managing Directors in areas such as Corporate Banking, Risk Management, Consumer & MSME Banking, HR, and Operations. Other supporting areas, such as Audit, Compliance, Legal, Treasury, IT, and Brand Communication, play critical roles in driving strategic alignment, operational efficiency, compliance, accountability, coordination, and finally, excellence in corporate governance.

2.4 Financial Performance of Prime Bank PLC.

2.4.1 Segment Wise Performance

In 2024, Loans and Advances of the Prime Bank are managed by Corporate and Institutional Banking (61%), followed by Commercial Banking (20%), whereas MSME, Consumer, and Emerging Markets make up the rest. On the other hand, Deposits are managed mainly by Consumer Banking (59%), MSME Banking (12%), and Wholesale (29%).



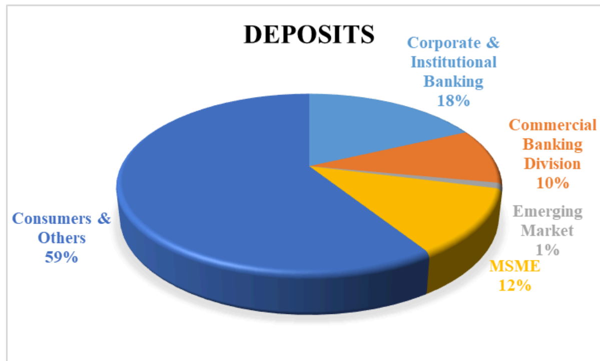


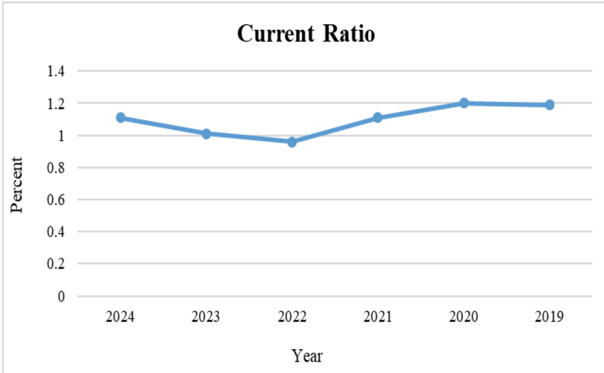
Figure 04: Loans & Advances.

Figure 05: Deposits.

2.4.2 Financial Ratios

Liquidity Measures						
Year	**2024**	**2023**	**2022**	**2021**	**2020**	**2019**
Current Ratio	1.11	1.01	0.96	1.11	1.20	1.19
Gearing Ratio	85.88	84	83.43	85.05	84.80	84.43
Debt Equity Ratio	13.12	12.53	12.42	12.68	11.69	11.09

Table 1: Liquidity Measures.



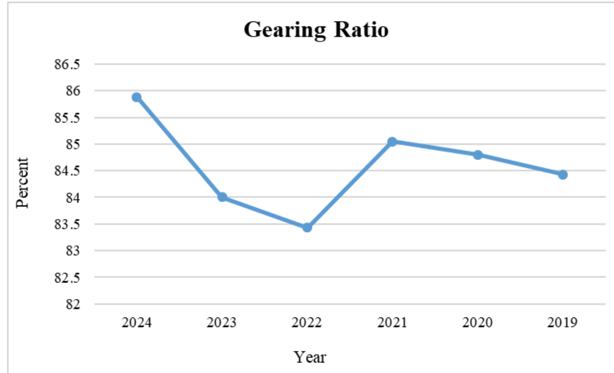


Figure 06: Current Ratio.

Figure 07: Gearing Ratio.

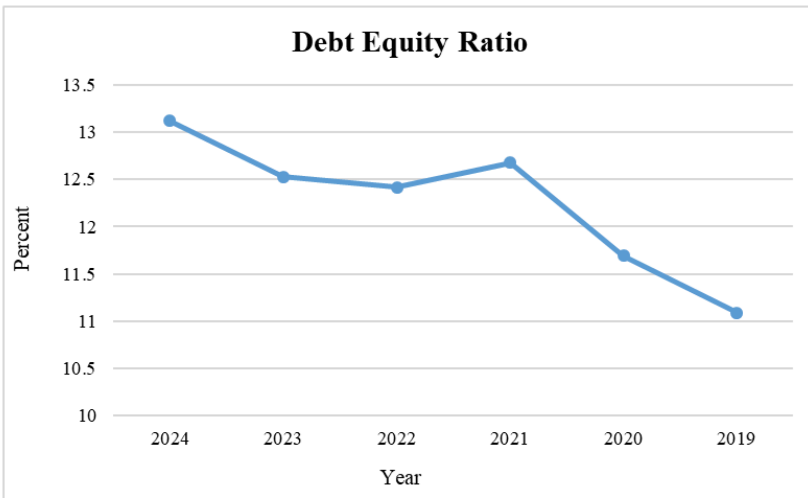


Figure 08: Debt-Equity Ratio.

The **Current Ratio** of the Prime Bank has fluctuated a lot. It dropped from 1.19 in 2019 to 1.11 in 2021, slid even lower to 1.01 in 2023, then climbed back up to 1.11 in 2024. Even with these ups and downs, the bank's liquidity still covers its obligations.

From 2019 to 2024, the **Gearing Ratio** did not change much, just hovering between 83.43% and 85.88%. This consistency shows that Prime Bank keeps its operations pretty balanced.

The **D/E ratio** has moved from 11.09 in 2019 to 13.12 in 2024 indicating an increasing trend over the years. High D/E ratios might be indicating the growth of deposits for the bank. A high D/E ratio is common in industries such as "Banking," where customers keep deposits in the bank.

Capital Measures

Capital Measures						
Year	**2024**	**2023**	**2022**	**2021**	**2020**	**2019**
Capital to Risk Weighted Asset Ratio (CRAR)	17.37	17.59	16.78	17.17	17.28	17.42
Leverage Ratio under Basel-III	5.59	5.73	5.72	5.71	6.23	6.38
Liquidity Coverage Ratio (LCR)	238.89	163.14	131.3	128.5	174.68	173.78
Net Stable Funding Ratio (NSFR)	121.89	113.67	112.29	116.89	124.65	127.3

Table 2: Capital Measures.

- Prime Bank PLC has managed to maintain its Capital to Risk Weighted Assets Ratio **(CRAR)** at higher levels than the regulatory requirement of –10%. This implies that the bank has a solid capital position and that the bank will continue to exist even in the face of probable loss. The CRAR of the bank has remained stable over the last few years, with the ratio fluctuating at 16.78% and 17.59%.
- Its **Leverage Ratio based on Basel III**, which is calculated by dividing Tier 1 capital by total leverage exposure, also reports a minor declining trend, falling from 6.38% in 2019 to 5.59% in 2024. However, the Leverage Ratio is much higher than the current regulatory norms. It is also significant because Bangladesh Bank has ordered all banks to increase their Leverage Ratio to 4% by the year 2026, so as to ensure financial stability.
- In compliance with BRPD Circular Number 18, issued in 2014, Bangladesh Bank requires all banks to keep **LCR (Liquidity Coverage Ratio)** and **NSFR (Net Stable Funding Ratio)** at or above 100%. The LCR ratio of Prime Bank is found to be highly adequate, having reached as high as 238.89% by 2024, indicating its ability to cope with short-term liquidity risk. On the other hand, the NSFR ratio is consistent, yet although its minimum value dropped slightly from 127.30% in 2019 to 121.89% in 2024, the ratio remains well above the minimum requirement.

Operating Performance of Prime Bank PLC.

Year	2024	2023	2022	2021	2020	2019
Gross Profit Ratio	52.12	54.4	62.66	68.91	55.03	54.74
Cost of Fund	7.67	6.54	5.53	5.09	6.68	7.91
Return on Average Assets (ROA)	1.46	1.07	0.98	0.85	0.54	0.54
Return on Average Equity (ROE)	20.56	15.01	13.58	11.18	6.67	6.27

Table 3: Operational Performance of Prime Bank.

The **Gross Profit Ratio** of the Prime Bank has been consistent in the past six years with marginal variation ranging from 54% to 69%. In the year 2024, the GP Ratio of the bank was recorded at 52.12%, while in the year 2023, the GP Ratio was recorded at 54.40%. This indicates a slight fall in the profitability of the bank from its core business.

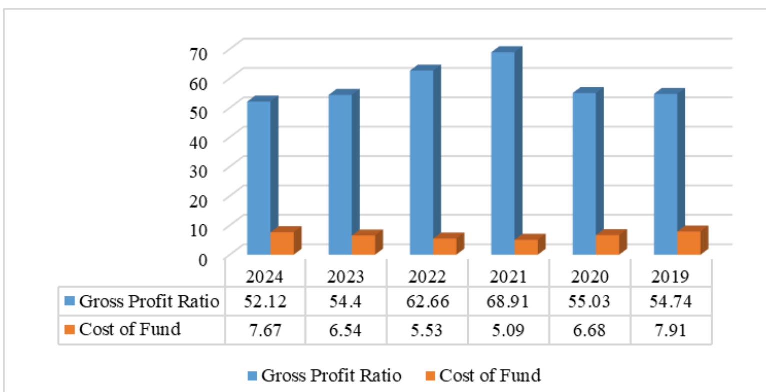


Figure 09: GP & COF of Prime Bank.

For the Prime Banks **Cost of Fund**, this has varied over the last six years. It was on a high in 2019 when the figure was 7.91%, then reduced steadily over the years until 2021, when it was 5.09%, before increasing again in 2024 to 7.67%. The trend seems to imply that while the Prime Bank has been able to manage its cost in the year 2020 and 2021, the trend of its funding costs has consistently been on the rise.

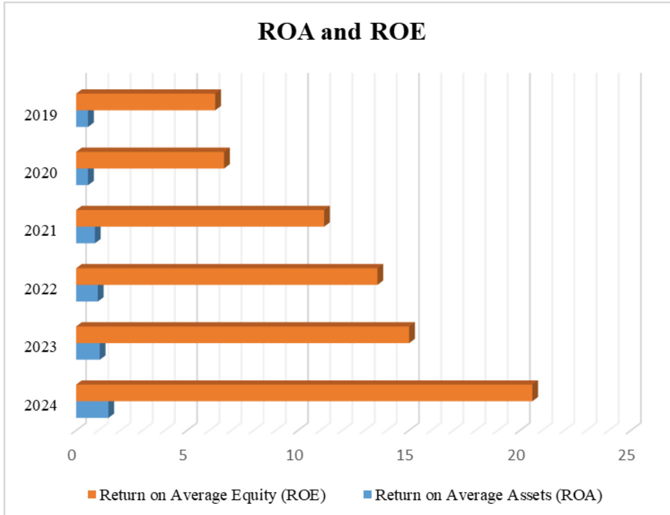


Figure 10: ROE and ROA of Prime Bank.

Over the period from 2019 to 2024, Prime Bank showed a strong rise in its **ROA** from 0.54% to 1.46%, whereas its **ROE** rose substantially from 6.27% to 20.56%. These strong positive trends indicated that there was a sharp improvement in efficiency and a strong performance on the shareholders' front.

Asset Quality

Year	2024	2023	2022	2021	2020	2019
Non-performing Loans Ratio	4.22	3.54	3.42	4.83	3.46	4.66
NPL Coverage	119%	150%	140%	109%	151%	103%

Table 4: Asset Quality Performance of Prime bank.

During this period, the NPL ratio had some fluctuations in the form of ups and downs but eventually reduced from 4.66% in 2019 to 4.22% in 2024. The NPL Coverage Ratio represents the provision made for potential credit loss and has increased substantially over the years from 103% in 2019 to 150% in 2023 before reducing to 119% in 2024. Thus, this reflects an improvement in the ability to manage credit risks for the Prime Bank; however, the marginal fall in 2024 also requires it to be vigilant in this particular aspect.

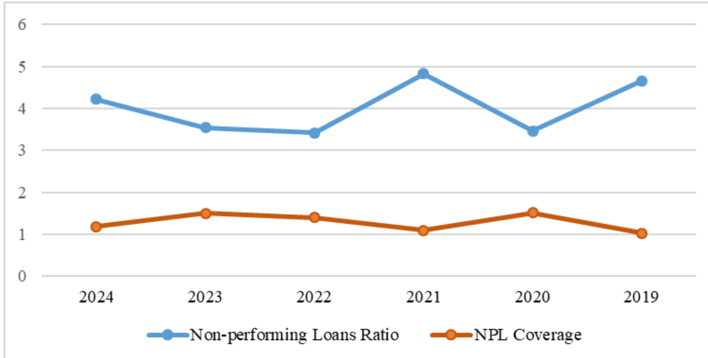


Figure 11: NPL Ratio and Coverage Ratio of Prime Bank.

Share Information

Information regarding Share	**2024**	**2023**	**2022**	**2021**	**2020**	**2019**
Earnings Per Share (BDT)	6.58	4.27	3.55	2.75	1.59	1.47
Price Earnings Ratio	3.56	4	5.46	7.83	10.77	12.4
Dividend Payout	17.5	17.5	17.5	17.5	15	13.5
Net asset value per share (BDT)	34.27	29.69	27.26	25.06	24.07	23.53

Table 5: Share Information of Prime Bank.

The EPS of Prime Bank has been increased substantially from BDT 1.47 in 2019 to BDT 6.58 in 2024, which indicates its high profitability. On the other hand, the P/E ratio reduced from 12.40 to 3.56, which indicates that with the increase in profitability, the market became conservative as investors were willing to pay a lower premium per unit of earning.

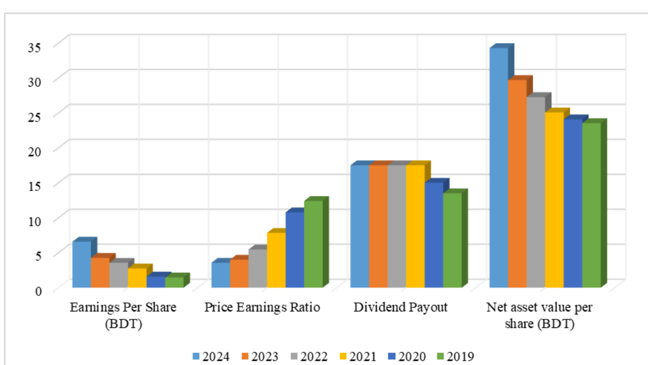


Figure 12: Share Information of Prime bank.

Accordingly, with a consistent 17.5% **dividend payout ratio**, Prime Bank balances stable shareholder returns with reinvestment for growth. At the same time, the **NAV per share** has increased from BDT 23.53 in 2019 to BDT 34.27 in 2024, indicating a strengthening equity base. These trends put together reflect that the bank is able to create shareholder value through prudent capital management and sustained profitability.

2.5 Industry and Competitive Analysis

2.5.1 PESTLE Analysis

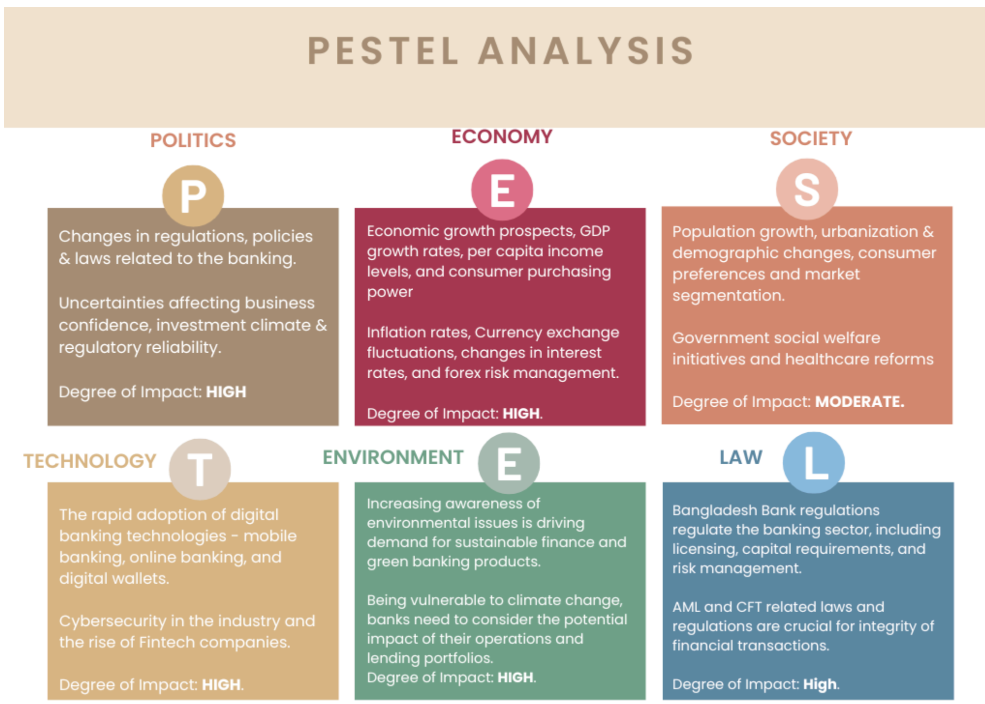


Figure 13: PESTLE Analysis.

The PESTEL factors analyzed indicate the key external factors affecting the banking sector of Bangladesh. Political factors such as regulatory changes and policy uncertainty have a significant impact on the overall functioning of the bank and investment in the country. Economic factors have a significant impact on the country's growth rate, inflation rate, and interest rate fluctuations, thus affecting the overall purchasing power of the consumers. Hence, this has a high impact. Similarly, the overall impact of the country's demographics in the form of urbanization and government policies falls under the social factors and has a moderate impact. Technological factors have a significant impact on overall digital growth in the form of digital banking and its evolution in the country. Similarly, environmental factors affect the growth of green banks in the country. Legal factors have a significant impact on overall bank functioning in the country.

2.5.2 SWOT Analysis

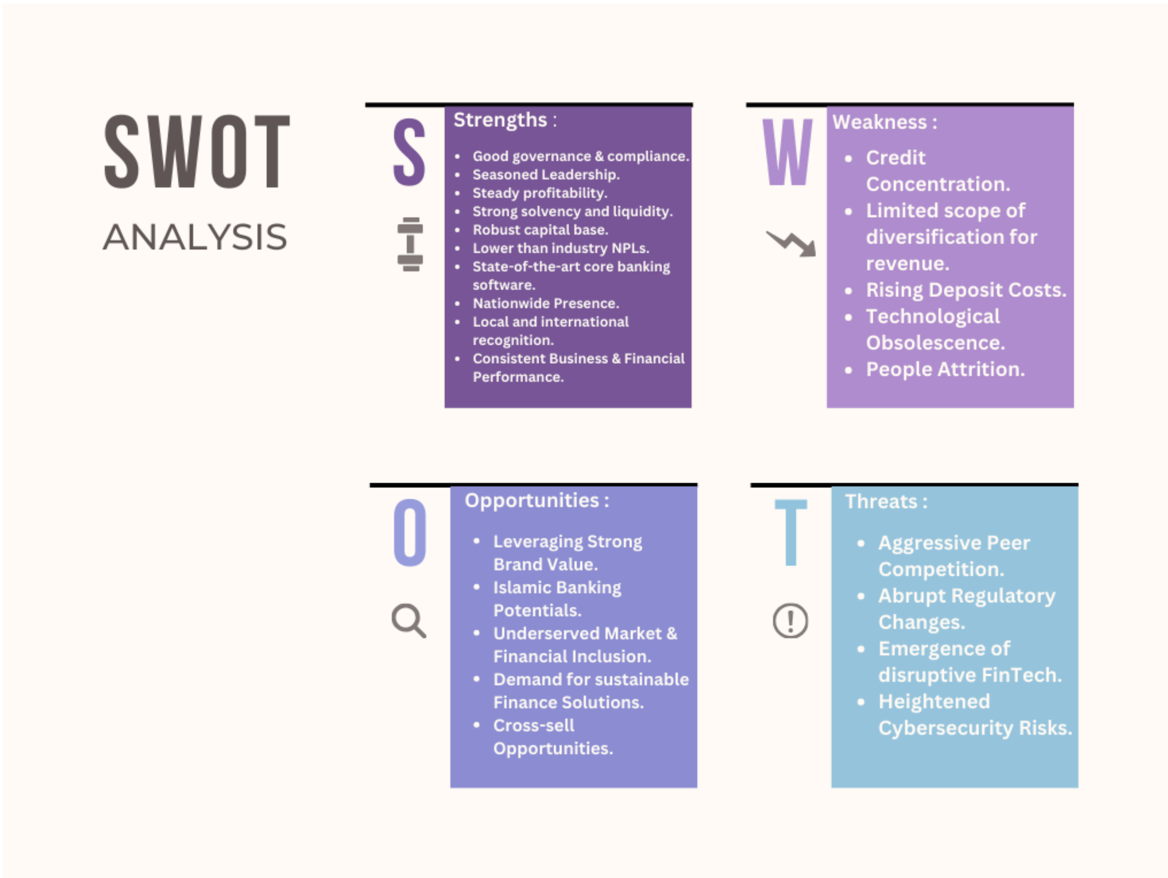


Figure 14: SWOT Analysis of Prime Bank.

From the SWOT Analysis of Prime Bank PLC, it is clear that the strengths include an impeccable corporate governance record, high regulatory compliance standards, high management quality, consistency in profitability, healthy liquidity and solvency levels, a high quality capital base, and lower levels of non-performing loans. Moreover, a high-tech platform and a wide geographical presence with a large number of branches all over the country also enhance financial stability. On the other hand, weaknesses include a high probability of credit concentration risk, low diversification of income streams, rising deposit costs, technological risk, and high attrition levels. In addition, there are opportunities that include high brand equity, high Islam banking awareness, participation in less financially inclusive segments, rising awareness for sustainable or green finance, and diversification of banking services. Furthermore, there is intense competitive pressure from other banks, surprises such as alterations in government policy and rules, fintech revolution, and cyber threats.

The foundation of good governance and capital position in the Prime Bank strengthens its position to bear the shocks of regulatory changes or those in the fintech sector, while risk concentration is covered by the potential of MSME and green finance. Although increasing deposit costs and employee turnover caused potential pain to the bank, its competitive advantage in innovative technology and brand equity provided the bank with an added advantage. With the adoption of sustainability with operational excellence, competition and cybersecurity risks are balanced out in a bid for the bank's maintenance of long-term profitability.

2.6 Conclusion

Prime Bank PLC has created a reputation as a top-tier private sector commercial bank in Bangladesh since 1995 with a wide range of services that operates through its 149 branches, including retail banking, Islamic banking, CMSME banking, and wholesale banking services. Prime Bank PLC has demonstrated its robust institutional strengths through its sustainable finance practices such as BDT 18,513.82 million in green finance instruments, its robust CSR practices such as BDT 136.62 million in 2024, and through its cutting-edge technology with T24, PRIME INTELLECT, and Prime PLUS systems.

Financial performance indicators also reflect the strength of the organization, as indicated by the CRAR of 17.37% for the bank compared to the minimum regulatory requirement of 10%. Other financial performance indicators are ROA of 1.46%, ROE of 20.56%, and control of the NPL ratio of 4.22%. Also, liquidity level is high for the bank as indicated by the LCR of 238.89% and NSFR of 121.89%. The centralized governance structure of the organization and the strategic goal of digital transformation position it favorably in a competitive environment in Bangladesh. The PESTLE analysis of the organization points out several challenges it faces, as indicated by the SWOT chart.

Thus, Prime Bank's overall frameworks and financial ratio strength suggest that the financial institution has the capacity and ability for operational effectiveness. However, operational effectiveness requires lots of consistency at the interface of touchpoints with customers. Here, for example, Chapter 3's analysis on the quality of KYC documentation will seek to investigate this critical slab or layer in translating policies into practice.

Chapter 3: Project Part

Analysis of KYC Accuracy and Documentation Quality in Account Opening at Prime Bank's Mohakhali Branch.

3.1 Introduction

I observed that 10% of newly opened accounts were denied by the Central Processing Center (CPC) due to documentation errors, such as address discrepancies, low income with high debt ratios, poor CIB reports, and a lack of signatures, during my internship at Prime Bank PLC's Mohakhali Branch, which ran from November 2025 to February 2026. Usually, this problem led to a cycle of rework that lasted anywhere from two to three days, sometimes even five if things got really bad. Each account ended up costing about BDT 1,500.

To analyze this gap, I did an audit of 100 account opening forms during my three months of internship at the Mohakhali Branch. In the findings & analysis, the audit of 100 files indicated that the average level of documentation completeness was 82.8% (4.14 out of 5 key documents), with vulnerability in tax documents (75%), utility bills (78%), and nominee details (82%). Serious mistakes, which in reality are quite serious gaps or CPC rejects, were found in 26% of the files. The level of mistakes differed considerably among individual RMs ranging from 9.1% to 36.4%, individual account types (highest in Current accounts, which stood at 33.3%), and a steady rise over the course of the internship period, but no significant difference between peak and off-peak periods of processing, where both are 26%.

This project part will examine the correctness of KYC at Mohakhali Branch, identify the shortcomings, evaluate the risk effect, and provide recommendations for improvement in KYC compliance at Prime Bank.

3.1.1 Background and Problem Statement

In order to stop money laundering and terrorist financing in Bangladesh, Bangladesh Bank has strict laws and regulations that regulate the banking sector. While the Bangladesh Financial Intelligence Unit (BFIU) enforces customer due diligence requirements, the Bangladesh Bank issued the e-KYC Guidelines in January 2020, which require proper electronic verification of customer profiles, classification of them based on risk, and safekeeping record of them (Bangladesh Bank, 2020; BFIU, 2024).There is a clear statement in Prime Bank's AML & CFT Policy in 2022, which goes like: "No account shall be opened without complete KYC documentation, regardless of customer pressure or business targets." (Prime Bank PLC, 2024).

However, in spite of the presence of clear policies and digital support systems like PRIME PLUS, PRIME INTELLECT, T24, there are still operational issues being faced by the Relationship Managers at the Mohakhali Branch of Prime Bank. The managers are often faced with incomplete customer submissions, including the absence of e-TIN/PSR, utility bills in the name of landlords, and insufficient proof of income, along with system glitches like OCR errors and heavy customer traffic (Prime Bank PLC, 2023).

The main problem lies in the implementation at the branch level, while the Prime Bank's policies demand a 100% completion of documentation, but only 82.8% is achieved leading to a 10% CPC rejection and 26% major errors. Initially, my observation led to workload pressure and congestion during peak hours, but after a thorough analysis of my 100 audited files, personal RM behavior, attentiveness, customer preparation deficiencies, and account type complexity were identified to be of more significant importance. It is the need of the hour to address and bridge these gaps in regulatory requirements and implementation to enhance compliance, enhance risk management, and ensure feasible banking operations at Prime Bank PLC.

3.1.2 Objectives

- Examine the current Know Your Customer (KYC) process and Account Opening process at Mohakhali branch of Prime Bank.
- Assess audited 100 account opening files to identify the degree of documentation completeness and error rates.
- Analyze the role of relationship managers how they confirm that client information is accurate while adhering to operational limitations.
- Evaluate how effectively Prime Bank's digital platforms such as T24, PRIME PLUS, and PRIME INTELLECT ensure KYC accuracy and documentation quality.
- Identify gaps between Prime Bank's official KYC policy and what practices are actually implemented at Mohakhali Branch by RMs.
- Analyze how KYC accuracy impacts the overall Prime Bank's risk management.
- Provide practical recommendations based on the findings to enhance KYC Accuracy and effectiveness at Prime Bank PLC.

3.2 Literature Review

3.2.1 Concept of KYC and Documentation Quality in Banking

The three key aims of Bangladesh Bank's compliance with FATF KYC standards are to identify clients accurately, assess risks, and monitor transactions to prevent money laundering and terrorist financing. KYC is more than just paperwork. It is most effective when the documents are credible and authentic. An effective KYC process reduces fraud, manages risk, promotes sound decision-making, and provides a genuine competitive advantage to banks. (TrainingCred, 2023).

The relationship managers ask for National ID, utility bills, proof of income, e-TIN or PSR, and nominee information from customers as per Prime Bank's Citizen's Charter (Q1 2025). The issue is that it offers hardly any useful information for typical customers who are either renters without utility bills in their names or freelancers without formal salary certificates. This remains a significant issue in implementing KYC effectively.

3.2.2 Regulatory Framework Governing KYC in Bangladesh

The KYC regulations in Bangladesh are in line with the international trend of strict enforcement but are in conflict with the objective of financial inclusion. The e-KYC Guidelines which is issued by Bangladesh Bank in 2020 involve the verification of digital National ID, risk-based categorization, and the retention of records for 5-10 years, which is very much similar to the European Union's Fourth Anti-Money Laundering Directive (4AMLD) risk-based approach (Fenergo, 2023).

Customer Due Diligence (CDD) is required by BFIU for the purpose of screening for sanctions, and filing of Suspicious Transaction Reports (STRs). During the Fiscal Year 2023-24, 18% of 4,872 STRs were due to poor KYC at the time of account opening (BFIU Annual Report 2023-24, p. 34), reflecting that account opening failures are the cause of risks later on, consistent with data indicating that 65% of GCC laundering cases involve poor account opening checks (AMLUAE, 2023).

Prime Bank's AML/CFT Policy (2022) states, "No account shall be opened without complete KYC documentation" (Prime Bank PLC, 2024), which contradicts the goal of banking the unbanked.

3.2.3 Digital KYC Implementation in Bangladesh

Digital KYC systems were developed to address issues that arise in the conventional verification process, including errors in manual processing, slow processing, and poor documentation. In this case, Prime Bank's "PRIME PLUS" solution is a good example, as it is able to read National ID information through OCR, as well as perform verification through the Election Commission in real time and assign risk scores. Many researches indicate that digital KYC can lower the error rate of data entry by 30-40% compared to manual processing.

In case of the effectiveness of digital KYC in Bangladesh, there are still some issues prevailing. These consist of a lack of internet connectivity in rural areas, errors in government records, especially in the old NID cards, and the lack of digital literacy among older or less educated customers.

Prime Bank has a hybrid approach, where technology is used for processing, and final decisions are taken by Relationship Managers. But at the same time, there is also a possibility of "automation bias," where employees rely too much on technology output. Technology enhances KYC but can not substitute human judgment.

3.2.4 Relationship Managers as Critical Gatekeepers

Technology, however, being the buzzword in the Know Your Client (KYC) industry, Relationship Managers (RMs) are the most essential human factor involved in the process of client onboarding (AMLUAE, 2023). RMs at the branch engage in individual interviews with customers, look for behavioral indicators of discomfort or evasiveness of them, assess documents by touch, and apply their skills to determine the levels of risk.

As per best practices, RMs need to identify "soft signals" like incongruities between the customer's reported income and lifestyle, reluctance to reveal the source of funds, or evidence of a third party controlling the account to perform effective KYC (TrainingCred, 2023). These human assessments require experience, appropriate training, and sufficient time, which are in short supply in busy bank branches. Prime Bank increases its compliance efforts by providing frequent AML/CFT training sessions to its employees, including workshops by BFIU on new money laundering threats and PEP checks (The Daily Star, 2024; Dhaka Tribune, 2024).

However, the relationship managers have to deal with a significant challenge that exists is that of conflicting demands. They have to comply with the strict KYC procedures while also meeting sales targets such as opening a certain number of accounts in a month and keeping customers satisfied. According to Fenergo (2023), sales and compliance functions should be separated, while KYC-Chain (2024) suggests that RMs' relationships with customers help in fraud detection and that incentive changes are needed to reward "First-Time Right" performance rather than the number of accounts.

3.2.5 Documentation Challenges in Bangladesh's Banking Sector

Industry reports and the observations of the regulatory authority have highlighted the challenges in KYC documentation in emerging nations, including Bangladesh, as follows:

i) Incomplete Documentation: Incomplete documentation is provided by customers, which does not include income statements, recent utility bills, and nominee details. According to KYC-Chain (2024), 15-20% of the initial account opening applications in Bangladesh require a follow-up due to incomplete documentation, similar to Kenya at 18% and Indonesia at 22%, as per Fenergo (2023).

ii) Address Verification Issues: Bills for utility services are the norm for address proof, but issues come up in rental, joint family, or community living arrangements which are common in Bangladesh. Employer letters and rental contracts are permissible according to the e-KYC requirements of Bangladesh Bank, but the inconsistent practices of the branches result in issues and down times (KYC-Chain, 2024).

iii) Document Quality Problems: The hard copies of the provided documents tend to be handwritten, blurry, or photocopied several times. For Bangladesh's varied documents such as handwritten bills, blurry NIDs, and pixelated trade licenses, the optical character recognition tool is not effective and the scanning is of poor quality (Fenergo, 2023).

iv) Tax Documentation Challenges: The need for e-TIN or tax return submission evidence causes difficulties, as tax compliance is low among the working-age population (KYC-Chain, 2024, citing World Bank estimates).

v) Workload Pressure vs. KYC Accuracy: To prevent complaints, RMs can accept almost done paperwork during peak hours which is a common phenomenon in Thai, Filipino, and Vietnamese banks (AMLUAE, 2023; TrainingCred, 2023).

3.2.6 KYC's Strategic Link to Risk Management

In recent literature, KYC is increasingly recognized as a complex risk management process rather than a simple AML/CFT compliance process.

i) Mitigation of Credit Risk: Banks are able to evaluate the customer's ability to repay the loan through effective income, address, and identity verification. According to TrainingCred (2023), a KYC-incomplete account experienced a 2.3 times higher risk of default within 36 months than a KYC-complete account. This indicates that even in the absence of financial crime prevention, KYC has a direct impact on the quality of the loan portfolio.

ii) Reduction of Operational Risk: Complete documentation prevents rework, delay, and disputes. According to Fenergo (2023), correcting the first error in documentation is responsible for 20-30% of the cost of KYC compliance, which is a huge efficiency gap.

iii) Brand Risk Management: Brand Risk Management: Failure to comply with KYC rules that finance terrorism and money laundering will result in fines and penalties. As per the BFIU Annual Report (2023-2024), a total of 147 enforcement actions were taken against Bangladeshi banks for non-compliance with KYC, which resulted in a total fine of BDT 83 million. This also led to negative media coverage for some banks. Prime Bank maintained good risk statistics throughout the fiscal year of 2024-2025, with a CRAR of 17.37% and an NPL of 4.22% (Prime Bank PLC, 2024).

3.2.8 Research Gap

1. Limited Quantitative Analysis of Branch-Level Implementation

The majority of the research on KYC in Bangladesh has been qualitative in nature, such as observations, regulatory analysis, or case studies of frauds, with little quantitative data on error rates, causes, or costs.

2. Disconnection Between RM Practices and KYC Outcomes

Though most research recognizes the importance of Relationship Managers in the accuracy of KYC information, very little research has been conducted to understand the impact of Relationship Managers' workload, training, motivation, judgment, and characteristics, such as dedicated Relationship Managers versus multi-tasking Relationship Managers, peak hour versus off-peak hour performance, on documentation errors in Bangladesh.

3. Technology Performance in Real-World Conditions

While the benefits of digital KYC are promoted in vendor and policy literature, independent analysis of practical performance like OCR accuracy, verification success, integration effectiveness is a gap that this research seeks to fill by examining PRIME PLUS, PRIME INTELLECT, and T24 digital systems.

3.3 Research Methodology

3.3.1 Research Design

For this study, the Mix Methods research design is employed combining the quantitative data of audits with qualitative observations and semi-structured interviews to explore both the quantitative aspects of KYC documentation performance and the factors that influence these results.

3.3.2 Data Collection

i) Primary Sources:

- **Document Audit (n = 100 Account Opening Files):** I as an intern audited 100 account opening files from Prime Bank's Mohakhali Branch in three months through systematic sampling of accounts personally reviewed, approximating a near-census with minimal bias. Five key categories of documents such as ID proof, address proof, income/occupation proof, tax documents, nominee information, were coded as to completeness/incompleteness with specified deficiencies, and CPC rejections were checked for consistency.

KYC Audit Raw Data — Prime Bank PLC, Mohakhali Branch | Nov 2025–Feb 2026 | n=100

Account ID	Opening Date	RM Name	RM Workload	Account Type	Processing Period	NID Complete	Utility Bill Complete	Income Proof Complete	Tax Document Complete	Nominee Complete	Total Complete Docs	CPC Rejection	Rejection Reason	Has Major Error	Pre-Check Intervention	Rework Stage	Month
ACC00002	9th November, 2025	Nelufa Yeasmin	Multi-tasking	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00003	9th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	No	No	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00004	10th November, 2025	Touhidur Islam	Dedicated	Savings	Peak	Yes	No	Yes	Yes	Yes	4	Yes	Address Mismatch	Yes	No	CPC-Level Rework	November
ACC00005	11th November, 2025	Touhidur Islam	Dedicated	Current	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00006	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00007	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00008	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	No	Yes	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00009	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	No	Yes	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00010	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00011	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00012	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	Yes	No	3	Yes	Address Mismatch	Yes	No	CPC-Level Rework	November
ACC00013	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00014	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00015	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00016	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00017	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00018	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00019	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	No	Yes	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00020	13th November, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Off-Peak	Yes	No	Yes	No	Yes	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00021	16th November, 2025	Ferdousy Jesmeen	Dedicated	Savings	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00022	19th November, 2025	Sadia Akter	Multi-tasking	Current	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00023	20th November, 2025	Ferdousy Jesmeen	Dedicated	Savings	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00024	23rd November, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Off-Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00025	25th November, 2025	Touhidur Islam	Dedicated	Payroll	Off-Peak	Yes	Yes	No	Yes	Yes	4	Yes	Insufficient Income & High	Yes	No	CPC-Level Rework	November
ACC00026	25th November, 2025	Touhidur Islam	Dedicated	Payroll	Off-Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00027	27th November, 2025	Sadia Akter	Multi-tasking	Savings	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00028	30th November, 2025	Ferdousy Jesmeen	Dedicated	Current	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00029	3rd December, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	December
ACC00030	4th December, 2025	Ferdousy Jesmeen	Dedicated	Current	Peak	Yes	Yes	No	No	No	2	NO	—	Yes	Yes	Branch-Level Rework	December
ACC00031	7th December, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December
ACC00032	8th December, 2025	Sadia Akter	Multi-tasking	Savings	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	December
ACC00033	9th December, 2025	Touhidur Islam	Dedicated	Current	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December
ACC00034	10th December, 2025	Abdullah Barek	Multi-tasking	Savings	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December
ACC00035	11th December, 2025	Ferdousy Jesmeen	Dedicated	Current	Peak	Yes	No	No	Yes	Yes	3	NO	—	Yes	Yes	Branch-Level Rework	December

Figure 15: KYC Audit Raw Data 100 Files.

- **Observation as an Intern:** I observed the Relationship Managers during peak hours (10:30 AM-2:00 PM, 4:00-5:30 PM) and off-peak hours (9:00-10:30 AM, 2:00-4:00 PM) to carefully note the interactions between the RMs and customers, the OCR errors in PRIME INTELLECT, the EC verification problems.
- **Informal Interviews:** I carried out informal interviews with all seven Relationship Managers of the Mohakhali branch on the quality of training, availability of rules on alternative papers, conflict between sales and compliance, actual effectiveness of PRIME PLUS, PRIME INTELLECT, and T24 in KYC, and documentation.
- **Secondary Source:** Examples of secondary sources are AML/CFT Policy Statement (2022), Bangladesh Bank e-KYC Guidelines (2020), BFIU Annual Report (2023-24),

Prime Bank PLC Annual Reports (2023 & 2024), and BFIU Risk Management Guidelines (2022).

3.4 Findings and Analysis

3.4.1 Account Opening Process: The account opening process of the Mohakhali Branch of Prime Bank is designed to attract new customers while following the legal requirements as closely as possible. I personally experienced this vital "DNA" of customer service of the bank during my internship.

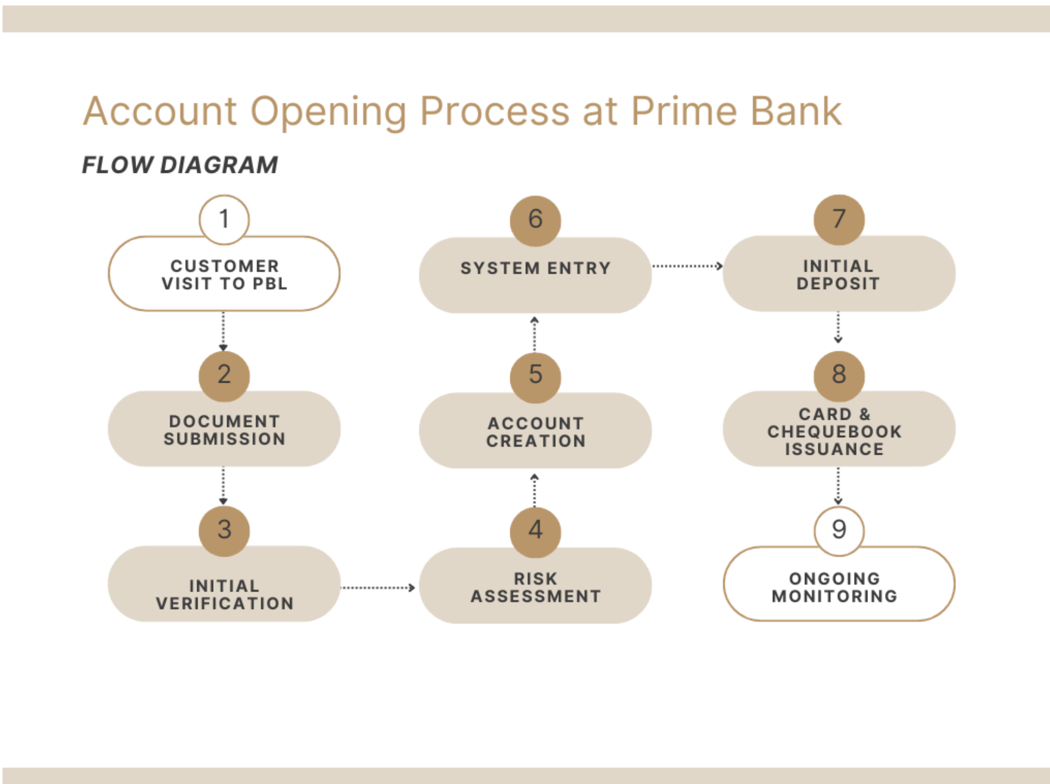


Figure 16: The Diagram of AOF Process.

The above diagram illustrates a systematic 9-step process flow that helps in the customer onboarding process while also taking into account the regulatory requirements. To be noted, the process starts from the first visit of the customer and then moves on to the submission of documents, verification, risk evaluation, account opening, system entry, first deposit, card and cheque book issuance, and finally to monitoring.

The KYC process is essentially integrated into this process, particularly within steps 2 to 4 - “Document Submission, Initial Verification, and Risk Assessment” and onward to step 9 “Ongoing Monitoring”. Although the entire account opening process involves a host of operational and administrative activities, this study shall exclusively concentrate on the KYC compliance aspects that guarantee customer identification, verification, risk assessment, and AML/CFT regulatory requirements as stipulated by the Bangladesh Financial Intelligence Unit (BFIU) and Bangladesh Bank.

3.4.2 KYC Process at Prime Bank PLC. :

Figure 17: KYC Process at Prime Bank PLC.

1. Collecting and Reviewing Customer Documentation

- **Must Know Your Customer (KYC) Documents:**

Document Type	Requirements
Proof of Identity	National ID Card (NID), Passport or Birth Registration Certificate (BRC).
Proof of Address	Recent Copy of Utility Bills (Water, Telephone, Electricity, Gas bill)
Proof of Income/Occupation	Salary Certificate/LOI/Job ID, Tax documents (e-TIN/PSR), or Trade License for businesses.
Nominee Information	NID or Birth Registration Certificate of the nominated individual(s).
Photographs	Recent two passport-sized photographs of the applicant and one of nominee.

Table 6: Documentation Requirements for Customers.

- **First Review by RMs:** The relationship managers (RMs) review the documents manually. The reasons:

➢ **Completeness**: To ensure that as per the checklist, customers have correctly submitted all necessary documents like NID, Utility Bills etc.

➢ **Rightness:** To make sure of the readability of the scanned or copied documents.
➢ **Flexibility**: Verification of customer's names, addresses, and other information being more or less consistent across all submitted documents and the Account Opening Form (AOF).
➢ **Indicators of Clarity**: In order to identify possible document fraud, verification of any obvious unusual features are needed.

2. Verification and Screening through Digital Systems

- **T24 - The Core Banking System:** After verified manually, the customers' documents such as NID, Utility Bills, Tax documents are processed into Prime Bank's core banking system - T24.
- **PRIME INTELLECT - Digitizing Documents:** To reduce errors in transcription and create an electronic audit trail, hard copies submitted by customers are scanned using OCR.
- **Verification by the Election Commission:** To make sure of the accuracy and conform to official records, NID information is immediately compared to the EC database.
- **Categorization based on Risk**: Based on customer's information like their PEP status, transaction behavior, occupation, and source of funds. And the result of electronic searches, the customer is then classified into a risk category, such as low, medium, high risk, among others.

Risk Category	Charateristics	Review Frequency
Low Risk	Salaried employees, government officials, small businesses with transparent operations.	Every 10 years
Medium Risk	Self-employed professionals, medium enterprises, moderate cash transactions.	Every 8 years
High Risk	PEPs, High cash businesses, foreign nationals, complex corporate structures, non-resident accounts.	Every 2 years with enhanced monitoring

Table 7: Customer Risk Categorization Framework at Prime Bank.

3. Compliance Review and Approval

A compliance team performs secondary verification at the Head Office in Gulshan Avenue by comparing digital information with physical documentation to detect any discrepancies in addresses, nominee information, or ambiguous source of funds. If any are discovered with errors, the physical documentation is sent to the Mohakhali branch again. Customers are then communicated for clarification if necessary, and final approval is given by individual RMs after all discrepancies are cleared.

4. Enhanced Due Diligence (EDD) for High-Risk Customers

For high-risk customers, the KYC process needs the Enhanced Due Diligence (EDD) procedure. This includes:

➢ Background checks of the customers that are more comprehensive.
➢ Checking their source of the funds and the source of the wealth for legitimacy.
➢ Review of business relationships that are complicated.

➢ Obtaining the consent of the senior management in opening an account for respected high-risk customers.

5. Ongoing Monitoring and Record Keeping

Prime Bank also monitors customer transactions for any unusual patterns that may indicate money laundering and other financial crimes, while maintaining all KYC documents, verification results, and risk assessments for the required period of time to comply with audit and AML/CFT regulations.

3.4.3 Quantitative Error Analysis

- **Document Completeness Rate**

Document Completeness Rate (n=100)		
Document Type	Complete	Incomplete
NID/Birth Registration Copy	94%	6%
Utility Bill (Water/Electricity/Gas)	78%	22%
Salary Certificate (LOI/Job ID)	85%	15%
Tax Documents	75%	25%
Nominee Details	82%	18%

Table 8: Document Completeness Rate based on 100 audited files.

1. Verification of Customer Identity - NID/Birth Registration Copies: NID or Birth Registration Copies have the highest level of completeness at 94% due to smooth integration with the Election Commission database through PRIME PLUS. Smart NID copies or photocopies can be verified instantly through real-time API verification. The remaining 6% incompleteness is usually found in laminated, blurred, torn, or missing NIDs that are old.

2. The Proof of Income Documents: Tax returns are the least complete form of returns (75% complete, 25% incomplete), which is one of the major problems at the Mohakhali branch. Unlike the salaried class, who have their pay slips or letters from their employers, the branch has a large number of small businessmen, freelancers, and consultants from the unorganized sector who often do not have any "normal" proof of income. RMs spend a lot of time convincing taxpayers why their bank statements or mobile transaction records do not conform to the criteria laid down by BFIU and Bangladesh Bank. The principal reason for files being held in the "Rework Loop" is the 25% incompleteness rate of tax returns.

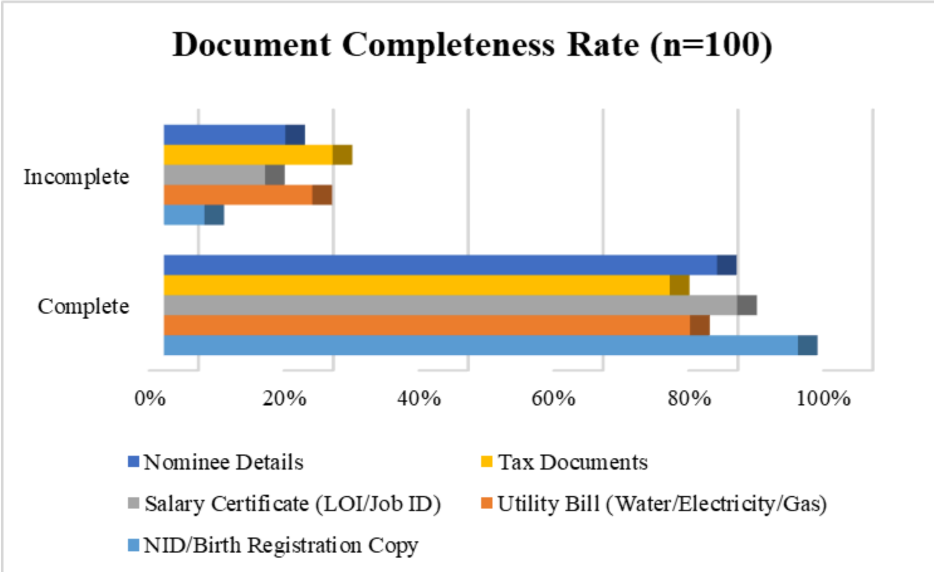


Figure 18: "Document Completeness Rate (n=100)".

3. The "Address Mismatch": Utility Bills (Water, Electricity, Gas) could only manage 78% completion (22% incomplete), although the fact is that almost all households in Dhaka are connected to these services. The problem here is that most of these customers pay their bills in their landlord's name and not in their own, which does not meet KYC address verification standards. In these instances, RMs are required to inquire for secondary documents such as a lease agreement, a letter from the employer stating their address or even a bank statement from recent months with the address displayed.

Though rework was decreased by 12% due to early detection at the Mohakhali branch, the table does not take into account the significant amount of manual verification required to check the BFIU Risk Matrix to avoid CPC rejection. Incomplete forms (income and residency proof) were directly responsible for 48-72 hour processing times due to customer follow-ups for repeated identity verification.

- **Root Cause Analysis of Central Processing Center (CPC) Rejection**

I audited 100 account opening files during my 12-week employment at the Prime Bank's Mohakhali branch. The Central Processing Center (CPC) rejected 10% (10 cases) of the files, while 90% were accepted. I analyzed these ten cases as an intern before checking many files to determine the operational issues that were causing the 48-72 hour Rework Loop.

Categorization of CPC Rejections (n=10)			
Rejection Reason	No. of Cases	% of Total Rejections	Risk Category
Address Mismatch	3	30%	Compliance/AML Risk
Missing Applicant Signature	4	40%	Operational/Legal Risk
Poor CIB Report	1	10%	Credit Risk
Insufficient Income & High DBR	2	20%	Financial/Credit Risk
Total	**10**		

Table 9: Categorization of Center Processing Center Rejections.

1. The "Administrative Oversight" (40% of rejections): The most frequent reason for rejection which is missing signatures, is also the most preventable. I observed that during "Peak Hours" from 10.30 AM – 2:00 PM, Relationship Managers (RMs) are often handling multiple customers simultaneously. In the rush to provide fast service, a signature on one of the sub-forms, like the FATCA or the Nominee page, is occasionally overlooked.

2. "Verification Conflict" (30% of rejections): When the customer's actual address was not the same as the NID address, there were often address discrepancies. I spent a considerable amount of time helping RMs compare utility bills with the NID. These claims were usually rejected by the CPC because the "Supporting Document" (the bill) was not sufficient to bridge the logic gap in the system.

3. The "Qualitative Red Flags" (30% of rejections): Such risk-based rejections, due to low income, high DBR, or poor performance in the CIB report, serve as a secondary filter by the CPC which is a significant contrast to rejections due to clerical mistakes. The assessment of CIB information and DBR by the CPC ensures the quality of Prime Bank's assets despite the RM's pressure on the client for onboarding.

4. The Operational Impact: Each of these ten rejections was a "substantial Operational Waste." My data shows that a rejected file required:

- ➢ 1-2 additional phone calls due to customer recall.
- ➢ Satisfaction with the customer is reduced by one additional visit.
- ➢ Compared to the 90 successful files, there was an average loss of three working days.

- **Operational Time and Cost Impact of Documentation Errors**

The average monthly salary of the relationship managers at Prime Bank's Mohakhali branch is BDT 45,000. The basic hourly rate is BDT 256, with 22 working days and 8-hour days. The conservative fully loaded cost is BDT 500 per RM man-hour, with a 100% markup for the branch overheads (rent of a prime Mohakhali location, utilities, high-speed internet, and license for PRIME INTELLECT, T24, and PRIME PLUS).

Operational Cost per File — Error-Free vs. Rework Scenarios

Table A: Operational Cost per File (BDT)					
Efficiency Metric	Error-Free File	File with Branch-Level Rework	File with CPC-Level Rework	Gap (Error-Free vs CPC)	Notes
Processing Time (Touch Time)	1.5 hrs	3.0 hrs	4.5 hrs	3.0 hrs	Each CPC rejection triples RM workload
Turnaround Time (Total Clock)	24 hrs	48 hrs	72–96 hrs	48–72 hrs	Customer cannot use account during delay
Operational Cost (BDT @ 500/hr)	750	1500	2250	1500	Fully-loaded RM rate incl. overhead
Customer Satisfaction Impact	None	Moderate (1 extra contact)	High (1–2 calls + branch visit)	—	Reputational cost not quantified

Table 10: Operational Time and Cost Impact of Documentation Errors. FTR = First-Time Right.

1. Processing Time (Touch Time). An error free account opening process involves 1.5 hours of active RM engagement including the customer interview, NID verification through PRIME PLUS, EC integration, document scanning through PRIME INTELLECT, and AOF submission. An account that reaches the Central Processing Center (CPC) and is returned takes 4.5 hours, as the RM needs to make 1-2 follow-up calls, wait for the customer to return to the branch, re-collect or re-verify the required document, and resubmit to CPC.

2. Turnaround Time (Total Clock). Error-free accounts are activated within 24 hours of account opening. CPC-level rework raises the total time to 72-96 hours (up to four business days), whereas branch-level rework takes 48 hours. Customers are not able to use their new debit card or account services during this time. The main cause of customer dissatisfaction at the Mohakhali branch is the 48-72 hour waiting time, especially for Payroll Account customers, such as corporate employees, who need immediate access to their funds.

3. Operational Cost. An error free file will incur a cost of BDT 1,500 (3 hours × BDT 500) to the branch. Therefore, the "cost of poor quality" is BDT 1,500 for a CPC-rejected file.

Rework Stage Breakdown (n=100)

Table B: Rework Stage Breakdown — This Study (n=100)						
Rework Stage	Files (n)	% of Total	Cost Per File (BDT)	Total Cost (BDT)	Avg Turnaround	Customer Impact
No Rework Needed	74	74%	750	55,500	24 hrs	None
Branch-Level Rework	16	16%	1,500	24,000	48 hrs	1 follow-up contact
CPC-Level Rework	10	10%	2,250	22,500	72–96 hrs	Customer recall + branch revisit
TOTAL	**100**	**100%**	—	**102,000**	—	—

Table 11: Rework Stage Breakdown by Cost and Customer Impact (n=100).

My audit data gives me a three-level classification of rework over the 100 files. 74 files (74%) needed no rework, and these were First-Time Right submissions that were error-free and cost BDT 750 each giving a clean total processing cost of BDT 55,500. 16 files (16%) needed rework at the branch level. In this case, errors were caught during pre-submission checks and corrected before CPC submission, at a cost of BDT 1,500 per file (BDT 24,000 total) and an average 48-hour turnaround. 10 files (10%) needed rework at the CPC level. In this case, errors were not picked up at the branch level and resulted in formal rejection at the CPC level, at BDT 2,250 per file (BDT 22,500 total) with a 72-96 hour turnaround and the most severe customer service disruption.

The total operational cost for all 100 files was BDT 102,000. Of this, BDT 46,500 (45.6%) was entirely preventable rework cost, which is the sum of the cost of Branch-Level rework (BDT 24,000) and CPC-Level rework (BDT 22,500) that could have been avoided if all 26 error-affected files had been submitted correctly the first time.

My Pre-Check Contribution to Error Reduction

Table C: My Pre-Check Contribution to Error Reduction			
Metric	**Value**	**Calculation Basis**	**Implication**
Total files with major errors	26	Has Major Error = Yes (n=100)	Base for all rework calculations
Errors caught at branch (pre-check)	16	Major Error=Yes AND CPC Rejection=NO	61.5% of errors resolved before CPC submission
Errors reaching CPC (missed)	**10**	**CPC Rejection = Yes**	**Residual gap — target for digital auto-flagging**
Branch interception rate	**61.5%**	**16 ÷ 26**	**Majority of errors contained at branch level**
Cost saved by pre-check (BDT)	**24000**	**16 files × BDT 1,500**	**Operational waste avoided during internship**
Remaining annual exposure (BDT)	69.7M	149 branches × est. methodology	Network-wide if current error rate continues

Table 12: Intern Pre-Check Contribution Summary. Green rows indicate key performance metrics.

Of the 26 files that had serious documentation problems, as an intern I was able to successfully identify and fix errors in 16 files (61.5%) before they were submitted to CPC. By working in coordination with Relationship Managers, I ensured that these files were not rejected, thus saving the branch BDT 24,000 in rework costs (BDT 1,500 per rejection cycle) and also liberating 32 RM man-hours (2 hours per file) that could have been utilized for acquiring new customers. The other 10 files (38.5%) managed to pass the human review at the branch level and got rejected at CPC, thus indicating a serious weakness in the current manual review process.

This practical experience thoroughly validates the need for digital automation, such as setting up PRIME INTELLECT with obligatory pre-submission validation rules to prevent files from being submitted if they are not complete. Thus, reducing all remaining rejections without any additional human effort and further enhancing the KYC process as a whole.

Network-Wide Cost Projection

The findings at PBL's Mohakhali branch can be tentatively projected to estimate the total cost effect in the entire urban network of the bank taking into consideration that each of the 149 branches of Prime Bank maintains an average of 100 account openings per month with a 26% significant error rate.

- 149 branches × 100 accounts per month = 14,900 files processed per month network-wide.
- 14,900 × 26% error rate = 3,874 files per month with major errors.
- The monthly quantity of avoidable waste is BDT 5.81 million, or (3,874 × BDT 1,500) for rework.
- The operational waste, which is completely avoidable, amounts to BDT 69.7 million per year.

Apart from the indirect costs such as client attrition, potential fines from BFIU for non-compliance with KYC regulations, and the cost of RM time that could be utilized for more lucrative activities, the actual cost of error in first-time file submission can be estimated at BDT 69.7 million.

- **Systematic Error Pattern Analysis**

While analyzing the audit of account opening files of 100 customers at Prime Bank's Mohakhali Branch, I was able to identify some patterns in the documentation errors that significantly differed based on the experience level of the relationship manager, time of day, and type of account.

Analysis 1: Error Rate by Relationship Manager Workload

During my 3 months of stay at the Mohakhali branch, I noticed that it was essentially Seven RMs having six or more years of experience, who actually performed these Account Opening procedures. This analysis will therefore examine error patterns through two different lenses: RM performance and workload category, such as whether the RM is dedicated to account opening or multi-tasking. Of the 100 audited files,

- **60 were processed by 3 Dedicated RMs:** Ferdousy Jesmeen, Ashikur Rahman, and Touhidur Islam.
- **40 by 4 Multi-tasking RMs:** Sadia Akter, Nelufa Yeasmin, and Abdullah Barek.

Individual RM Performance: The table below shows a complete analysis of all seven RMs based on error rates from lowest to highest. The results show a huge difference in performance from 9.1% (Sadia Akter) to 36.4% (Abdullah Barek). Three observations are particularly noted from my end.

Table A: Individual RM Performance Summary (n=100)

RM Name	Workload	Files Processed	Major Errors	Error Rate (%)	CPC Rejections	Rejection Rate (%)	Pre-Check Interceptions	Branch Interception Rate	Avg Docs Complete
Sadia Akter	Multi-tasking	11	1	9.1%	0	0.0%	1	100.0%	4.36
Tousif Uddin Ahmed	Multi-tasking	5	1	20.0%	0	0.0%	1	100.0%	4.00
Nelufa Yeasmin	Multi-tasking	13	3	23.1%	0	0.0%	3	100.0%	4.08
Ferdousy Jesmeen	Dedicated	28	7	25.0%	3	10.7%	4	57.1%	4.21
Touhidur Islam	Dedicated	14	4	28.6%	3	21.4%	1	25.0%	4.14
Ashikur Rahman	Dedicated	18	6	33.3%	2	11.1%	4	66.7%	4.11
Abdullah Barek	Multi-tasking	11	4	36.4%	2	18.2%	2	50.0%	3.91
TOTAL / AVERAGE	**—**	**100**	**26**	**26.0%**	**10**	**10.0%**	**16**	**61.5%**	**4.12**

Table 13: Documentation Error Rates by Individual RM (n=100).

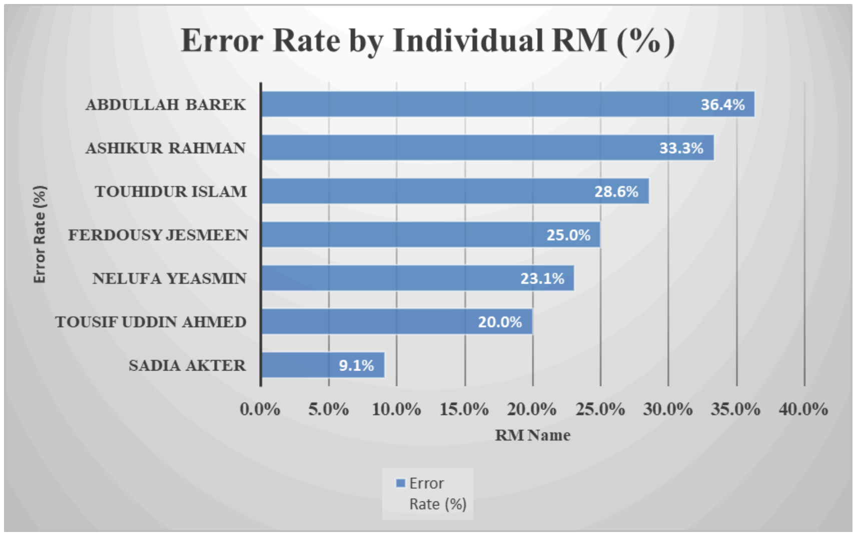


Figure 19: Error Rate by Individual RMs (%).

i) The best performer is a Multi-tasking RM. Sadia Akter, who performs account opening and other cash services, has the lowest error rate in the entire set with 9.1% over 11 files and no CPC rejections. Her average document completeness of 4.36 out of 5 is also the highest among all RMs. This completely disputes the premise that multi-tasking has a negative effect on KYC accuracy.

ii) The worst performer is also a Multi-tasking RM. Abdullah Barek had the highest error rate of 36.4% over 11 files with 2 CPC rejections and an 18.2% rejection rate, along with the lowest average document completeness of 3.91. Notably, only 50% of his errors were intercepted at the branch level prior to CPC, the second-lowest pre-check interception rate in the group. The difference between Sadia Akter (9.1%) and Abdullah Barek (36.4%), both Multi-tasking RMs, shows that error rate cannot be predicted by workload category.

iii) Dedicated RMs are not insulated from high error rates. Employees like Ashikur Rahman, who are dedicated to their work, had the second-highest error rate of 33.3%, and Touhidur Islam had the highest CPC rejection rate of 21.4% among all individual RMs, which means that more than one in every five files was rejected by the Central Processing Center. This result indicates that it is not necessary to have good KYC results without proper habits and document discipline even if one is dedicated to account opening activities.

Workload Category Comparison

Table B: Error & Rejection Rate by Workload Category

Workload Category	RMs	Files	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Key Insight
Dedicated	3	60	17	28.3%	8	13.3%	Higher rejection rate (13.3%) — more complex accounts processed
Multi-tasking	4	40	9	22.5%	2	5.0%	Lower rejection rate (5.0%) — errors caught at branch more often

Table 14: Error and Rejection Rate by Workload Category.

On the level of overall error rate, Dedicated RMs showed an error rate of 28.3% compared to 22.5% for Multi-tasking RMs. This represents a difference of 5.8 percentage points in the opposite direction of what might have been expected. However, the more interesting difference is in what happens to errors once they have occurred. Dedicated RMs allowed 8 errors to reach CPC (13.3% rejection rate), while Multi-tasking RMs had only 2 CPC rejections (5.0%). The key difference in this case is the branch interception rate, which is significantly higher for Multi-tasking RMs at 77.8% compared to 52.9% for Dedicated RMs. This would appear to indicate that Multi-tasking RMs perhaps because they are used to dealing with multiple tasks at the same time are taking a more cautious approach before submitting files, while Dedicated RMs, dealing with larger volumes of work at the counter, are allowing more errors to slip through.

Document Completeness by Individual RM

The following table discloses document completeness at the individual RM level revealing which specific document types are failing for which RMs.

Table C: Document Completeness Rate by Individual RM (%)							
RM Name	Workload	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness
Sadia Akter	Multi-tasking	100%	91%	100%	64%	82%	87%
Tousif Uddin Ahmed	Multi-tasking	100%	80%	80%	40%	100%	80%
Nelufa Yeasmin	Multi-tasking	85%	77%	100%	77%	69%	82%
Ferdousy Jesmeen	Dedicated	93%	86%	82%	86%	75%	84%
Touhidur Islam	Dedicated	100%	64%	79%	86%	86%	83%
Ashikur Rahman	Dedicated	94%	78%	78%	72%	89%	82%
Abdullah Barek	Multi-tasking	91%	64%	82%	64%	91%	78%

Table 15: Document Completeness Rate by Individual RM.

- ➢ Tax Documents (e-TIN/PSR) is the most universally weak document type that is now emerging in the red zone for four of the seven RMs. Tousif Uddin Ahmed has the lowest rate of completion of tax documents at 40%, although his sample size (n=5) is too small to make any concrete observations. Abdullah Barek and Nelufa Yeasmin have only 64% of their tax documents completed, which is a reflection of the trend of their clients being in the informal sector and freelancers who do not have formal documentation of their income sources.

- ➢ The second area of concern is Utility Bill completeness, with Touhidur Islam and Abdullah Barek both at 64%, reflecting the well-documented "address mismatch" where customers in rented accommodation submit bills registered under landlords' names.

- ➢ Sadia Akter's 100% completeness in both NID and Income Proof—the two most important document categories that have the largest impact on AML/CFT risk assessment—adds fuel to her overall average performance of 87% document completeness. The only area where she is slightly weak is in Tax Documents, which stands at 64%, but this is a customer-level issue and not an issue at the RM level.

Synthesis and Implications

Three conclusions emerge from this analysis:

- **Individual variation dominates workload effects:** The variation in error rates for individual RMs is much larger (27.3 percentage points: best 9.1% vs. worst 36.4%) than the variation in workload categories (only 5.8 percentage points: 22.5% vs. 28.3%). Rather than a role change for all, training for the three RMs with high error rates above 25% like Touhidur Islam, Ashikur Rahman, and Abdullah Barek would be much more effective.

- **Dedicated RMs' Error Interception Gap:** Relationship Managers intercept only 52.9% of errors before files reach the CPC which means that almost half of them go unnoticed. This highlights a major weakness in the pre-submission screening process during peak periods, which can be remedied by mandating a PRIME INTELLECT digital checklist that will not allow for the submission of an incomplete file.

- **Tax document completeness Recommendation:** Introduce branch instruction and mobile pre-submission checklists that focus on e-TIN and PSR requirements for these clients in an effort to improve the low tax completion rates (40-86%) across all RMs, which are largely due to customer gaps in the informal/self-employed sector.

Analysis 2: Error Rate on the basis "Time of Day"

One of the beliefs at the branch banking operations is that RMs misplace papers or fail to verify because of the stress of handling five to eight clients at one time. This study directly tests this assumption. Each of the 100 files was labeled as either Peak (10:30 AM-2:00 PM and 4:00 PM-5:30 PM, when observed queue length was 5-8 customers) or Off-Peak (9:00 AM-10:30 AM and 2:00 PM-4:00 PM, when queues were 0-2 customers) depending on the upload times of PRIME INTELLECT. Out of the 100 files, 73 were uploaded during peak hours and 27 during off-peak hours.

Overall Peak vs. Off-Peak Comparison

Table A: Error & Rejection Rate — Peak vs. Off-Peak

Processing Period	Files Processed	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Pre-Check Interceptions	Key Finding
Peak (10:30AM–2PM & 4PM–5:30PM)	73	19	26.0%	8	11.0%	11	Error rate virtually identical to Off-Peak
Off-Peak (9AM–10:30AM & 2PM–4PM)	27	7	25.9%	2	7.4%	5	No statistically meaningful difference

Table 16: Error and Rejection Rate by Processing Period (n=100).

The error rates for Peak hours (26.0%) and Off-Peak hours (25.9%) are practically the same, with a difference of merely 0.1 percentage points which is insignificant. This is in direct conflict with the hypothesis that time pressure is responsible for KYC errors. Both periods have similar CPC rejection rates, as well as 11.0% Peak and 7.4% Off-Peak, a difference of 3.6 percentage points which is not significant in the context of the small off-peak sample size of 27 files.

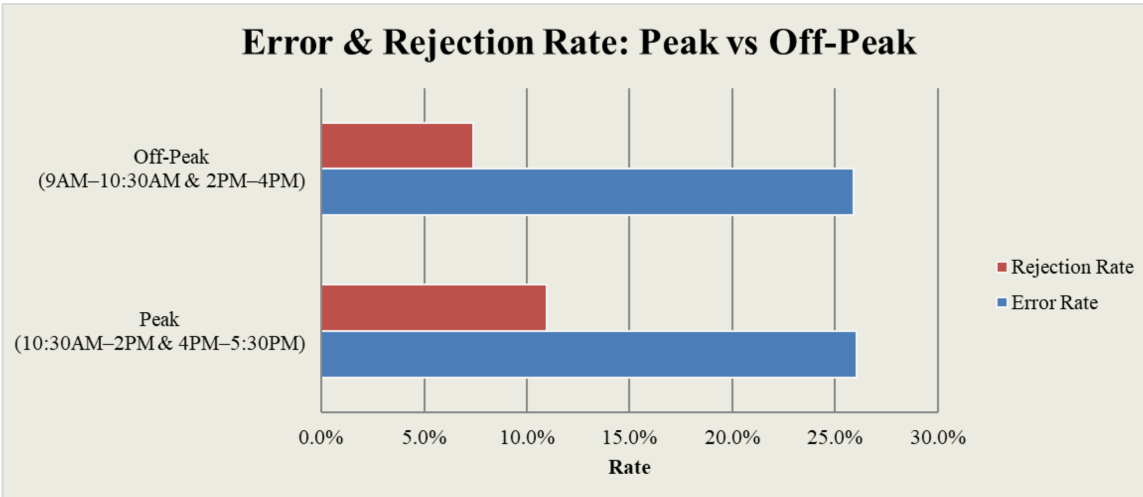


Figure 20: Error & Rejection Rate - Peak Vs Off-Peak.

Cross-Tabulation: Workload × Processing Period

To analyze whether time-of-day effects could be obscured within workload categories, the following table shows a four-way cross-tabulation of Workload and Processing Period.

Table B: Cross-Tabulation — Workload × Processing Period							
Workload	**Processing Period**	**Files**	**Major Errors**	**Error Rate**	**CPC Rejections**	**Rejection Rate**	**Interpretation**
Dedicated	Peak	47	14	29.8%	7	14.9%	Highest rejection rate — complex accounts + volume
Dedicated	Off-Peak	13	3	23.1%	1	7.7%	Moderate error rate even when quiet
Multi-tasking	Peak	26	5	19.2%	1	3.8%	Best CPC rejection rate (3.8%) — more errors caught at branch
Multi-tasking	Off-Peak	14	4	28.6%	1	7.1%	Error rate similar to peak — supports systemic cause

Table 17: Error and Rejection Rate by Workload Category and Processing Period.

For Dedicated RMs, the error rate is marginally lower during Off-Peak hours (23.1% vs. 29.8% error rate), as would be expected if less traffic means more attention to detail. But for Multi-tasking RMs, the reverse is true: their error rate is actually higher during Off-Peak hours (28.6%) than during Peak hours (19.2%). This is almost certainly due to a selection effect, such as the types of accounts Multi-tasking RMs are dealing with during Off-Peak hours being more complex cases they've put off until the end of the main rush, or their handling of more non-account-opening tasks (loan follow-ups, paperwork) exactly when the counter is less busy, and thus devoting less concentrated attention to each case.

Point to be noted, the category of "Dedicated + Peak" has 47 of the 100 files and has both the highest error rate of 29.8% and the highest absolute number of rejections which is 7. This category, which is the most common processing mode at the branch, is also the branch's weakest point.

Document Completeness by Processing Period

This section examines whether there are document categories that are more likely to be incomplete during peak hours, implying that time constraint is the underlying reason for incompleteness due to RM.

Table C: Document Completeness by Processing Period (%)						
Processing Period	**NID**	**Utility Bill**	**Income Proof**	**Tax Docs**	**Nominee**	**Avg Completeness**
Peak	93%	78%	86%	75%	79%	82%
Off-Peak	96%	78%	81%	74%	89%	84%

Table 18: Document Completeness Rate by Processing Period. Colour coding.

For all types of documents, the completeness percentage is almost the same for both processing times. The bill payment is actually 78% complete all through the peak and off-peak hours, whereas the tax returns are 75% complete instead of 74%. The only significant difference is Nominee Details, which is 79% Peak compared to 89% Off-Peak, a difference of 10 percentage points which may imply that during peak times, RMs are more likely to submit documents without fully completing the nominee details. This is a single item that requires specific attention via the PRIME INTELLECT mandatory fields setup.

The almost identical rates of document completeness for the near-identical periods affirm that the incompleteness issue is customer-driven, and not RM-driven. Customers come to the Mohakhali branch at all times of the day with the same set of structural incompleteness issues, such as the lack of e-TIN certificates, utility bills in the name of the landlords, and the absence of nominee photographs, irrespective of the time, whether it is 10:30AM or 3:00PM.

Another pattern is found in the data regarding the reason for rejection. All eight rejections in Peak hours were administrative or compliance-related: Missing Signature (4 instances), Address Mismatch (3 instances), and Poor CIB Report (1 instance). However, the two Off-Peak rejections were for Insufficient Income. The High DBR rejections in Peak hours were due to risk-based reasons related to poor financial profile, as opposed to administrative errors such as missing signatures. This could indicate that peak pressure may be a factor in administrative errors such as missing signatures, even if it does not affect the rates of overall documentation completeness.

Analysis 3: Error Rate by Account Type

This analysis will evaluate whether the complexity gradient has a measurable effect on KYC error rates, and which document categories are driving failure for each account type. Of the 100 audited files, 27 were Savings Accounts, 15 were Current Accounts, and 58 were Payroll Accounts.

Error and Rejection Rate by Account Type

Table A: Error & Rejection Rate by Account Type									
Account Type	**Files**	**Avg Docs Required**	**Major Errors**	**Error Rate**	**CPC Rejections**	**Rejection Rate**	**Branch Interception Rate**	**Pre-Check Interceptions**	**Avg Docs Complete**
Savings	27	5	5	18.5%	3	11.1%	40.0%	2	4.26
Current	15	8	5	33.3%	1	6.7%	80.0%	4	4.07
Payroll	58	6	16	27.6%	6	10.3%	62.5%	10	4.10

Table 19: Error and Rejection Rate by Account Type (n=100).

Current Accounts have the highest error rate of 33.3% which implies that one out of every three Current Account files had a serious documentation error. However, their CPC rejection rate is quite low at 6.7%, 1 out of 15, due to their high branch interception rate of 80% meaning that four out of the five errors had been intercepted and corrected prior to the CPC stage. This is not surprising given that Current Account openings involve more careful pre-CPC scrutiny, especially in view of their business customer complexity.

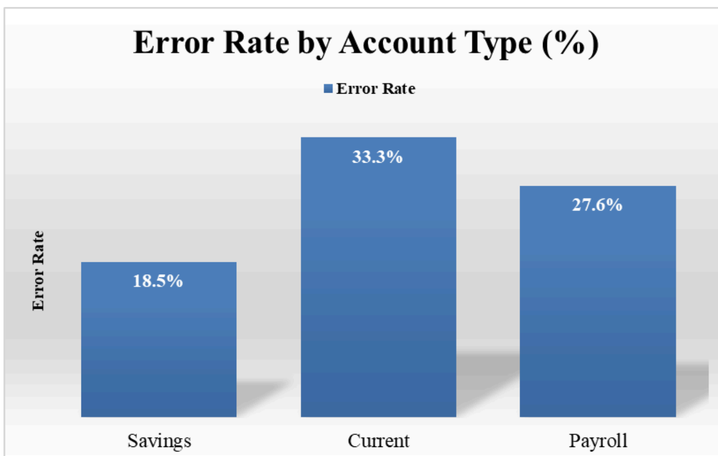


Figure 21: Error Rate by Account Type (%).

Payroll Accounts produce the highest absolute number of errors and rejections. With 16 major errors (27.6% error rate) and 6 CPC rejections, Payroll Accounts contribute 60% to the total number of errors and 60% to the total number of rejections in the sample, although they constitute 58% of the total files. Their branch interception rate of 62% is classified as moderate, since 6 errors actually made it to CPC. The large number of Payroll Accounts, coupled with the fact that 88% of these accounts were actually handled during peak hours by mainly Dedicated RMs, makes this the single largest source of operational risk in terms of total rework cost and customer service delay.

Savings Accounts work best with an 18.5% error rate but have the highest rejection rate (11.1%) compared to the error rate, suggesting that 3 of 5 errors made it to the CPC, resulting in only a 40% branch interception rate. This is the lowest interception rate among all account types, suggesting that errors made in the Savings Account files are more likely to go undetected during counter review.

Document Completeness by Account Type

Table B: Document Completeness by Account Type (%)							
Account Type	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness	Weakest Document
Savings	100%	81%	89%	74%	81%	85%	Tax Documents (74%)
Current	100%	73%	73%	80%	80%	81%	Utility Bill & Income Proof (73%)
Payroll	90%	78%	86%	74%	83%	82%	Tax Documents (74%)

Table 20: Document Completeness Rate by Account Type.

NID completeness is the only category that is universally strong. Savings and Current Accounts attain 100% NID completeness, and Payroll Accounts attain 90% meaning there is a slight gap due to the increased number of payroll documents being processed during peak times where occasional scan quality issues mandate manual intervention.

Tax Documents (e-TIN/PSR) is the weakest type of document for Savings (74%) and Payroll (74%) accounts. In the case of Savings Accounts, this is because the customer base of the Mohakhali Branch of the bank consists of freelancers and workers in the unorganized sector, who do not have standardized documentation of their tax registration. In the case of Payroll Account customers who are employees of corporations, the 74% figure is somewhat surprising and may be due to employees who have not yet registered for e-TIN or whose tax acknowledgment receipts (PSR) are not up to date.

Existing solutions demonstrate a glaring two-fold vulnerability with verification rates of 73% for income proof and utility bills. Smaller business applicants, particularly those operating in commercial hubs such as Mohakhali, tend to display such characteristics. Though income proof is often in the form of business bank statements and not official wage certificates, many such applicants tend to rent out property for which utility bills are still in the name of the property owner or a former tenant.

CPC Rejection Reasons by Account Type

Table C: CPC Rejection Reasons by Account Type					
Account Type	Missing Signature	Address Mismatch	Insufficient Income/High DBR	Poor CIB Report	Total Rejections
Savings	1	1	1	0	3
Current	1	0	0	0	1
Payroll	2	2	1	1	6
TOTAL	**4**	**3**	**2**	**1**	**10**

Table 21: CPC Rejection Reasons by Account Type (n=10 rejections).

Missing Signature is the most prevalent reason for rejection for all types of accounts like 4 out of 10 rejections), which is evenly distributed for Savings (1), Current (1), and Payroll (2) accounts. These are purely administrative rejections where documentation is collected and verification of identity is done, but the sub-forms (FATCA, Nominee, or Additional Terms) are unsigned. The problem is with all account types, and this shows a lack of process discipline rather than a problem with document complexity. PRIME INTELLECT should therefore put in place a digital checklist system that will not allow the submission of CPC until all required signature fields are checked to eliminate this problem.

Only the Savings and Payroll accounts ran into these problems. In all three cases, the customer's current address did not match the permanent NID address. Plus, the utility bill they gave did not clear CPC verification, either it was in the landlord's name or the address did not line up with what is on the Account Opening Form. On the flip side, Current Accounts had none of these rejections, mostly because trade licenses do a much better job at confirming business addresses.

Three out of ten rejections in savings and payroll accounts were risk-based (insufficient income/high DBR or poor CIB report). These are not RM errors; instead, the CPC is playing a vital secondary risk filter role pinpointing instances where the CIB reveals loan delinquencies or where reported income appears to be insufficient for expected transactions. RMs are supposed to spot risks within the Transaction Profile during assessment, proceed with Enhanced Due Diligence (EDD), or decline at the counter instead of accepting and submitting such files.

Analysis 4: Error Trend from November, 2025 to February, 2026

By tracking error rates, document completeness, and how things actually ran during my three-month internship, this analysis adds a sense of time which can not be obtained from one-off audits or past KYC checks at Prime Bank. There is data from only seven files in February 2026, but that is just too few to spot any real trends, so those are not included in the trend analysis.

Monthly Error and Rejection Trend

Table A: Monthly Error & Rejection Trend									
Month	Files Processed	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Pre-Check Interceptions	Branch Interception Rate	Avg Docs Complete	Trend Direction
November 2025	28	6	21.4%	3	10.7%	3	50%	4.21	▶ Baseline
December 2025	30	8	26.7%	2	6.7%	6	75%	4.07	▲ Rising (+5.3pp)
January 2026	35	10	28.6%	4	11.4%	6	60%	4.14	▲ Highest (+1.9pp)
February 2026	7	2	28.6%	1	14.3%	1	50%	4.14	— Partial month

Table 22: Monthly KYC Error and Rejection Trend (Nov 2025–Feb 2026).

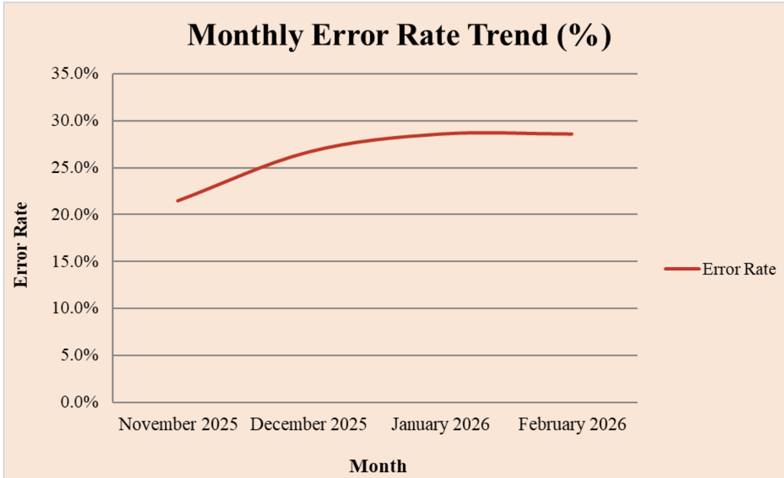


Figure 22: Monthly Error Rate Trend (%).

Error rates increased steadily throughout the test period. In November the error rate was 21.4%, in December it was 26.7%, and 28.6% in January, a 7.2 percentage point increase in three months. This is not random variation. November's baseline of 21.4% is the only month that is below the average of 26%, while December and January are above it. CPC rejection rates are more mixed. For example, December's 6.7% rejection rate is the lowest of all months, despite having the highest error rate, due to December's high branch interception rate (75% of errors intercepted before CPC). January sees a return to normal, with 60% interception and 4 CPC rejections, the highest of all months.

Document Completeness by Month

Table B: Document Completeness by Month (%)

Month	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness	Notable Change
November 2025	93%	79%	86%	82%	82%	84%	Tax docs strongest this month (82%)
December 2025	97%	80%	80%	70%	80%	81%	Tax docs dropped sharply (-12pp)
January 2026	91%	77%	89%	74%	83%	83%	NID completeness dipped (91%)
February 2026	100%	71%	86%	71%	86%	83%	Utility & Tax weakest (71%) — small sample

Table 23: Document Completeness by Month.

The strongest individual decline is the 12 percentage point fall in the completeness of Tax Documents from 82% in November to 70% in December. The explanation for this strong fall is likely to be found in the account type distribution in December, for example, seven Current Accounts were handled in December, which is more than in any other month and more than double the number handled in November, which was three. Current Account customers include business operators who are less likely to have current tax acknowledgment receipts readily available, thus reducing the overall tax document completeness figure for that month.

The completeness of NID exhibits a moderate decrease from 97% in December to 91% in January, the only month when NID is below 93%. January also witnessed the maximum number of files (35), maximum diversity of account types (18 Payroll, 12 Savings, 5 Current), and maximum share of Multi-tasking RMs (57% of files). The simultaneous occurrence of these conditions in January, when there is the maximum number of files, maximum diversity of account types, and maximum share of Multi-tasking RMs, provides a clear explanation for the occurrence of January as the point of convergence of the error trend.

Account Type and Workload Mix by Month

Table C: Account Type & Workload Mix by Month							
Month	**Savings**	**Current**	**Payroll**	**Dedicated RMs**	**Multi-tasking RMs**	**Total Files**	**Possible Explanation for Trend**
November 2025	6	3	19	22	6	28	Mostly payroll — lower complexity; more dedicated RMs
December 2025	7	7	16	20	10	30	More Current accounts (higher complexity); more MT RMs
January 2026	12	5	18	15	20	35	Most files; MT RMs dominant; diverse account mix
February 2026	2	0	5	3	4	7	Partial month — small sample, caution in interpretation

Table 24: Account Type and Workload Mix by Month.

The above table shows the compositional change that contributed to the trend of errors. First, the number of Multi-tasking RMs dealing with files increased significantly. In November, Multi-tasking relation managers handled 21% of the files, 33% of the files in December, and 57% in January. This is a compositional change that shows how the branch allocated its operational resources as the volume expanded, bringing more multi-role personnel to the account opening counter as year-end workloads intensified. Although Analysis 1 indicated that workload category by itself can not predict the rate of individual RMs' errors, the branch interception data in Analysis 1 indicated that Multi-tasking RMs, as a group, intercept a greater proportion of their errors before CPC (77.8% compared to 52.9% for Dedicated RMs). The observation that January's CPC rejection count, which is 4, is the highest despite the better MT-RM mix could indicate that the volume of January files (35), the highest of all months, may have been too much even for this benefit.

Second, the complexity of accounts has also increased over time. The number of Current Accounts handled has increased from 3 in November to 7 in December and then to 5 in January. Although the actual figures are small, the fact that Current Accounts have an error rate of 33.3% per Analysis 3 means that they make up a disproportionate number of branch errors. In December, the 7 Current Accounts handled account for 23% of the total files handled, but due to their 33.3% error rate, they are likely to account for 2-3 of the 8 errors in December. The combination of an increase in the number of Current Accounts and the incompleteness of Tax Documents in December is the strongest evidence in the data of the impact of account mix on error rates.

The month to month trend holds a future projection. If the January error rate of 28.6% is projected into the coming months as volume and diversity increase, the branch faces a potential decline in KYC standards that would be increasingly hard to correct by reactive rework rather than proactive structural change. Processing 100 accounts a month in each of the 149 branches, with an error rate of 28.6%, leads to about 4,261 rework cases every month. That adds up fast like around BDT 6.39 million each month or roughly BDT 76.7 million a year.

3.5 Role of Relationship Managers in Verifying Client Information Accuracy Under Operational Constraints

While pre-checking over 100 files during my three-month internship at Prime Bank's Mohakhali branch, I found that the quality of KYC paperwork is dependent on personal RM performance, not on workload or time of day.

i) How RM Reduce Onboarding Risk

The relationship managers at Mohakhali Branch reduce risk by:

- Careful verification of documents to confirm identity and prevent fraud.
- Physical presence verification to detect shell companies, especially applicable for businesses.
- Conducting client interviews to establish accurate transaction patterns and detect anomalies.
- Verification of individual signatures to prevent impersonation.

For example, RM Sadia Akter improved AML/CFT measures by ensuring 100% completeness of NID and income documents, enabling them to record the lowest error rate of 9.1%.

ii) The Power of RM Judgment (Soft Skills)

RMs use both of their professional judgment and soft skills combined with checklists to look out risks, such as:

- Identify lifestyle vs. income discrepancies.
- Evasive answers about the purpose of the transaction or the source of funds.
- Suggestions of third-party or benami accounts.
- PEP or other high-risk features suggesting EDD.

Three RMs with error rates above 25% (Touhidur Islam 28.6%, Ashikur Rahman 33.3%, and Abdullah Barek 36.4%) highlight regions where discipline and professional judgment training would be extremely beneficial.

iii) Link to Broader Financial and Regulatory Risk

Ineffective KYC at the RM level can lead to:

- Fraudulent accounts, nominees, and benami.
- Vulnerability to money laundering and terrorist financing.
- Defaulted loans due to misrepresentation of income.
- Sanctions from Bangladesh Bank or BFIU.
- Reputation damage to the Prime Bank.

iv) The RM's Dilemma and Solution

Sales targets and KYC requirements are a contentious issue for RMs, particularly during peak hours in branches like Mohakhali (Dedicated+Peak group: 47/100 files, 30% error rate, 7 rejections). But the numbers show that multitasking RMs were able to identify 77.8% of errors before submission, compared to dedicated RMs' 52.9%.

To conclude, the possible solutions could be to align incentives to reward accuracy over quantity, enforce pre-submission checklists, and train underperforming individuals. These practical steps improve KYC quality without needing drastic changes to the system design.

3.6 Technology and System Analysis at Mohakhali Branch of Prime Bank

This section evaluates:

EC Verification System Effectiveness

For e-KYC, Prime Bank checks customer's NID details like their name, photo, date of birth, and address against the National ID Database using the EC Verification System. At the Mohakhali Branch, this system nailed a 94% accuracy rate on the first try out of 100 audited cases. That means almost every file went through without a hitch. The few that got stuck, about 6%, needed help from staff. Fixing those files took an extra day or two and usually came down to outdated info, bad scans, network hiccups, or slight mismatches in how names were spelled between the NID and the account form.

PRIME INTELLECT and T24

T24 handles opening accounts and updating info in real time. PRIME INTELLECT takes care of document submissions and the first steps of KYC. Gaps in integration cause manual re-entries, account for 10% of CPC rejections, and are common sources of nomination and address mismatches, slow syncs, and late risk alerts (such as PEP/sanctions matches).

40% of rejections (4 out of 10) are because of missing signatures. These can be totally eliminated without any extra cost by employing a mandatory digital pre-submission checklist in PRIME INTELLECT, which will not allow the submission to CPC until all data is checked.

Difference between OCR Accuracy & Manual Entry

Data auto-population from clear NID scans is effectively done by PRIME INTELLECT and Prime PLUS OCR (accuracy of 94% on name, NID number, and DOB). However, only 75-85% of the utility bills, trade licenses, and other scans are correct, requiring manual entry into T24. Manual entry takes a longer time like l 5-10 minutes each file and has transcription errors of about 10% when pressed for time.

3.7 Gap Analysis: Policy vs. Practice

Prime Bank asks for complete, verifiable documents, sticking to the KYC and AML rules set by Bangladesh Bank and BFIU. They do not allow any shortcuts like no provisional approvals, no opening accounts before all the checks are done.

But when I went through 100 files and spent time at the Mohakhali Branch, what I saw did not match the official policy at all. There's a real gap between what's on paper and what actually happens.

Area	Policy Requirement (BB/BFIU/Prime Bank)	Observed Practice at Mohakhali Branch	Key Gap & Implications
Documentation Completeness	Full, verifiable documents mandatory at onboarding; no provisional acceptance without CDD/EDD	Avg. 82.8% complete (Tax: 75%, Utility: 78%); provisional submissions common	48–72 hr delays, 12% rework, higher ML/TF risk
RM Judgment & Risk Assessment	Mandatory red-flag detection, Transaction Profile interview, EDD for high-risk; no sales override	Effective in most cases but rushed during peaks; inconsistent EDD due to sales pressure	Risk of benami/fraudulent accounts; weakens frontline AML defense
Technology Utilization	Real-time e-KYC, OCR, auto-sanctions screening mandatory	Excellent for NID (94%); OCR/manual fallback for others; limited auto-flagging	Slower processing, missed automation benefits, higher error rate
Training & Compliance	Annual mandatory AML training; strict STR reporting; alternatives only with verification	Training irregular for ~40% staff; alternatives accepted but follow-up inconsistent	Exposure to regulatory fines and undetected risks

Table 25: Policy Requirements vs Practice at Mohakhali Branch level.

The Overview of the Completeness of Documents

In the case of Prime Bank's Mohakhali Branch, an audit of 100 account-opening files showed an average level of document completeness of 82.8%. However, due to its strong real-time Election Commission link, NID verification had the strongest performance, at 94%. The weakest points were nominee information (82%), income proofs (85%), electricity bills (78%), and tax documents (75%). Contrary to the performance of RMs, workload, and time constraints, these are mostly driven by customer-related issues, such as tenants using energy bills in the name of their landlords, unorganized sector workers/freelancers without e-TINs or regular income documents and even employed individuals submitting outdated tax documents.

RM Judgment & Variation

The relationship managers vary significantly in their treatment of risk. For example, Abdullah Barek had the highest error rate with 36.4%, a difference of 27.3 percentage points, while Sadia Akter had the lowest error rate of 9.1%. The majority of errors, namely 38.5%, remain undetected by CPC because error detection is largely dependent on the individual's vigilance in the absence of a mandatory digital pre-submission checklist.

Technology & Training Gaps

On the tech front, PRIME INTELLECT did a solid job with NID verification—94% success, so no real complaints there. But once the topic of non-NID documents comes up, things start to fall apart. OCR just could not handle them, and people had to jump in to process about 6-10% of those files by hand. The system also missed mismatches on tax or utility bills, so it is not exactly foolproof. To conclude, around 40% of RMs still have not updated their AML/CFT training to cover the new rules for 2022 to 2025.

3.8 KYC Quality and Its Direct Influence on Risk Management

3.8.1 Credit Risk

The three key aims of Bangladesh Bank's compliance with FATF KYC standards are to accurately identify clients, assess their risks, and monitor their transactions to prevent money laundering and terrorist financing. KYC is more than just paperwork; it is most effective when the paperwork is credible and authentic. An effective KYC process reduces fraud, manages risk, promotes sounder decisions, and provides a genuine competitive advantage to banks. (TrainingCred, 2023)

3.8.2 AML/CFT & Regulatory Risk from KYC Gaps

AML risks are significantly heightened by gaps in source of funds reporting (22%) and address verification (30%). Based on BFIU data for 2023-2024, insufficient onboarding KYC is identified as the root cause for 18% of Suspicious Transaction Reports (STRs).

The audit revealed:

- ➔ **Income and occupation discrepancies:** Three cases.
- ➔ **Funding sources**: Eight cases of questionable sources.
- ➔ **Utility bills:** 12 bills from third parties, such as landlords.

In FY23-24, BFIU imposed an average fine of BDT 564,000 per case, with 147 KYC-related actions and BDT 83 million in fines imposed on institutions. The Mohakhali Branch remains weak to immense penalties for its 10% CPC rejection rate.

3.8.3 Operational Efficiency Drain

The cost for each rework is BDT 1,500 (BDT 2,250 for rejected files as opposed to BDT 750 for error-free files). Severe error rate is 26%:

- **Network-wide:** 14,900 files monthly → 3,874 errors → BDT 5.81 million rework on a monthly basis.
- The cost for avoidable waste, not including client delays (48-72 hours), attrition, RM opportunity cost, and possible penalties, is BDT 69.7 million per year; the actual cost is much higher.

3.8.4 Reputational & Strategic Risk

The KYC errors pose a threat to the reputation of Prime Bank (Best Bank award, Global Finance 2020). The error rate is soon going to reach 30%, as it has already risen from 21.4% in November 2025 to 28.6% in January 2026. Bangladesh Bank's new regulations of e-KYC have the ability to make the branch non-compliant and require remediation at the current level of 82.8% document completion. Furthermore, the possibility of accelerated processing or EDD being overlooked exists due to the 30% error rate in low-income/DBR cases.

3.9 Conclusion

In this chapter, from my analysis of my audited 100 files it was found that there was a large difference between the strong institutional policy for 100% documentation completeness and risk-based CDD and actual branch performance, where the average completeness was only 82.8%. The performance was best in NID verification at 94%, where there was strong real-time EC integration, and worst in tax documents at 75% and utility bills at 78%, mainly because of customer-side structural problems like landlord's bills, absence of e-TIN, and old tax receipts rather than the RM's role, workload, and pressure in peak hours. The branch had a CPC rejection rate of 10% and a major error rate of 26%, which resulted in a direct preventable rework cost of BDT 46,500.

Four major findings defied prevailing beliefs such as individual RM discipline propels quality much more than RM role – 27.3-point error margin difference between best and worst-performing RMs versus only 5.8 points between Dedicated and Multi-tasking RMs; time of day does not affect error rates – near-identical peak and off-peak error rates); Current Accounts feature the highest error rate (33.3%) because of the complexity of business onboarding; and monthly error rates deteriorated from 21.4% in November to 28.6% in January, reflecting structural problems. These problems manifest as significant institutional risks, the 2.3 times higher default risk of incomplete KYC customer profiles could increase network-wide NPLs by an estimated BDT 94 million over three years; 22% source-of-funds errors pose direct AML/CFT risks consistent with BFIU enforcement activity; and the 26% error rate equates to an estimated BDT 69.7 million in annual preventable operational losses for 149 branches.

The main reasons are the lack of customer preparation tools upstream, the lack of necessary digital pre-validation in PRIME INTELLECT, and irregular RM checks due to a lack of systematic training. Simple changes such as digital checklists for First-Time-Right submission, customer education, and training for underperforming individuals could prevent millions of dollars in losses and make KYC a genuine differentiator.

3.10 Recommendations

Here's what I would suggest do to help Prime Bank PLC improve KYC accuracy:

1. First, make the **PRIME INTELLECT Pre-Submission Checklist mandatory**. This simple step does a lot. It sets clear standards, boosts first-time-right rates, and weeds out incomplete forms, especially the ones missing signatures, which generally make up more than 40% of all disqualified submissions. The best part is there is no extra cost. It's a straightforward digital check, and honestly it's just following what top KYC programs around the world already recommend. Plus, it cuts down on human mistakes and closes those annoying loopholes.
2. **Inconsistent RM diligence** needs to be fixed **by changing up the KPIs** . Instead of just pushing for more volume, making quality the focus is a must—FTR above 95%, CPC rejection below 5%. This shift really tightens up KYC accuracy and gets RMs to work differently for the better.
3. In **Targeted RM coaching**, it makes sense to look at each RM's needs. Take Sadia Akter's 9.1% error rate, everyone checks things a little differently and that is where most mistakes come from. So, coaching should zero in on those differences. And regular quarterly AML/CFT workshops keep everyone updated on the latest regulations. That way helps everyone stay sharp.
4. **Fix PRIME INTELLECT–T24 Integration**: Cut down rejections and rework by sorting out those annoying field mismatches like addresses and nominee information and set up real-time syncing and alerts. Bangladesh Bank says this is a must for reliable e-KYC, so it's not optional.
5. **Mobile Pre-Submission App / Customer Checklist:** Getting customers to pre-upload their info and get an early thumbs up. This stops branches from running into problems like missing tax or utility documents, especially with clients who do not have everything lined up. It also speeds things up, since clients come in better prepared. Plus, it fits perfectly with the whole push toward digital onboarding.

References:

1. **Bangladesh Bank.** (2020). *Guidelines on e-KYC*. https://www.bb.org.bd/aboutus/regulationguideline/aml/jan082020_ekyc.pdf
2. **Bangladesh Financial Intelligence Unit (BFIU).** (2024). *Annual report 2023-24*. https://www.bfiu.org.bd/pdf/pub/annual/bfiu_2023-24.pdf
3. **Prime Bank PLC.** (2023). *Annual report 2022*. https://www.primebank.com.bd/assets/reports/annual-disclosure/Prime-Bank-Annual-Report-2023.pdf
4. **Prime Bank PLC.** (2024). *Annual report 2023*. https://www.primebank.com.bd/assets/reports/agm-notice-proxy/Prime%20Bank%20Annual%20Report%202024.pdf
5. **Prime Bank PLC.** (2025). *Citizens' charter report Q1 2025*. https://www.primebank.com.bd/assets/default/Citizens-Charter-Citizens-Charter-Report-Q1-2025.pdf
6. **Prime Bank PLC.** (2022). *AML & CFT policy statement*. https://www.primebank.com.bd/assets/aml-kyc-file/1672860629_AMLCFTPolicy_Statement_2022.pdf
7. **Prime Bank PLC.** (2025). *Schedule of charges: Individual accounts*. https://www.primebank.com.bd/assets/schedule-charge/sub/files/1756649974_Individual-Account-01-09-2025.pdf
8. **Dhaka Tribune.** (2024, June 25). *Prime Bank holds an "AML & CFT compliance & Awareness" workshop*. https://www.dhakatribune.com/business/banks/350205/prime-bank-holds-aml-cft-compliance
9. **The Business Standard.** (2021, June 10). *Prime Bank introduces PrimePlus for digital onboarding*. https://www.tbsnews.net/economy/banking/prime-bank-introduces-primeplus-258376
10. **The Daily Star.** (2022, September 20). *Prime Bank, BFIU organise anti-money laundering training in Moulvibazar*. https://www.thedailystar.net/business/banking/news/prime-bank-bfiu-organise-anti-money-laundering-training-moulvibazar-3987466

11. **AML UAE.** (n.d.). *Best practices for KYC compliance*. https://amluae.com/best-practices-for-kyc-compliance/2
12. **Fenergo.** (n.d.). *Understanding KYC requirements for banks*. https://resources.fenergo.com/blogs/understanding-kyc-requirements-for-banks
13. **KYC-Chain.** (n.d.). *KYC & AML compliance coverage: Bangladesh*. https://kyc-chain.com/coverage/bangladesh
14. **TrainingCred.** (n.d.). *The importance of KYC (Know Your Customer) in banking operations*. https://trainingcred.com/blog/the-importance-of-kyc-know-your-customer-in-banking-operations

Appendix

KYC Audit Raw Data — Prime Bank PLC, Mohakhali Branch | Nov 2025–Feb 2026 | n=100																
Account ID	Opening Date	RM Name	RM Workload	Account Type	Processing Period	NID Complete	Utility Bill Complete	Income Proof Complete	Tax Document Complete	Nominee Complete	Total Complete Docs	CPC Rejection	Rejection Reason	Has Major Error	Pre-Check Intervention	Rework Stage	Month
ACC00001	9th November, 2025	Nelufa Yeasmin	Multi-tasking	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00002	9th November, 2025	Nelufa Yeasmin	Multi-tasking	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00003	9th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	No	No	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00004	10th November, 2025	Touhidur Islam	Dedicated	Savings	Peak	Yes	No	Yes	Yes	Yes	4	Yes	Address Mismatch	Yes	No	CPC-Level Rework	November
ACC00005	11th November, 2025	Touhidur Islam	Dedicated	Current	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00006	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00007	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00008	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	No	Yes	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00009	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	No	Yes	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00010	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00011	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00012	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	Yes	No	3	Yes	Address Mismatch	Yes	No	CPC-Level Rework	November
ACC00013	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00014	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00015	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00016	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00017	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	No	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00018	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00019	12th November, 2025	Ferdousy Jesmeen	Dedicated	Payroll	Peak	No	Yes	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00020	13th November, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Off-Peak	Yes	No	Yes	No	Yes	3	NO	—	Yes	Yes	Branch-Level Rework	November
ACC00021	16th November, 2025	Ferdousy Jesmeen	Dedicated	Savings	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00022	19th November, 2025	Sadia Akter	Multi-tasking	Current	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00023	20th November, 2025	Ferdousy Jesmeen	Dedicated	Savings	Off-Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00024	23rd November, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Off-Peak	Yes	Yes	Yes	Yes	No	4	NO	—	No	No	No Rework Needed	November
ACC00025	25th November, 2025	Touhidur Islam	Dedicated	Payroll	Off-Peak	Yes	Yes	No	Yes	Yes	4	Yes	Insufficient Income & High	Yes	No	CPC-Level Rework	November
ACC00026	25th November, 2025	Touhidur Islam	Dedicated	Payroll	Off-Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00027	27th November, 2025	Sadia Akter	Multi-tasking	Savings	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	November
ACC00028	30th November, 2025	Ferdousy Jesmeen	Dedicated	Current	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	November
ACC00029	3rd December, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Peak	Yes	No	Yes	Yes	Yes	4	NO	—	No	No	No Rework Needed	December
ACC00030	4th December, 2025	Ferdousy Jesmeen	Dedicated	Current	Peak	Yes	Yes	No	No	No	2	NO	—	Yes	Yes	Branch-Level Rework	December
ACC00031	7th December, 2025	Nelufa Yeasmin	Multi-tasking	Savings	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December
ACC00032	8th December, 2025	Sadia Akter	Multi-tasking	Savings	Peak	Yes	Yes	Yes	No	Yes	4	NO	—	No	No	No Rework Needed	December
ACC00033	9th December, 2025	Touhidur Islam	Dedicated	Current	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December
ACC00034	10th December, 2025	Abdullah Barek	Multi-tasking	Savings	Peak	Yes	Yes	Yes	Yes	Yes	5	NO	—	No	No	No Rework Needed	December

Analysis 1: Individual RM Performance & KYC Documentation Quality									
RM Name	Workload	Files Processed	Major Errors	Error Rate (%)	CPC Rejections	Rejection Rate (%)	Pre-Check Interceptions	Branch Interception Rate	Avg Docs Complete
Sadia Akter	Multi-tasking	11	1	9.1%	0	0.0%	1	100.0%	4.36
Tousif Uddin Ahmed	Multi-tasking	5	1	20.0%	0	0.0%	1	100.0%	4.00
Nelufa Yeasmin	Multi-tasking	13	3	23.1%	0	0.0%	3	100.0%	4.08
Ferdousy Jesmeen	Dedicated	28	7	25.0%	3	10.7%	4	57.1%	4.21
Touhidur Islam	Dedicated	14	4	28.6%	3	21.4%	1	25.0%	4.14
Ashikur Rahman	Dedicated	18	6	33.3%	2	11.1%	4	66.7%	4.11
Abdullah Barek	Multi-tasking	11	4	36.4%	2	18.2%	2	50.0%	3.91
TOTAL / AVERAGE	**—**	**100**	**26**	**26.0%**	**10**	**10.0%**	**16**	**61.5%**	**4.12**

Table B: Error & Rejection Rate by Workload Category							
Workload Category	RMs	Files	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Key Insight
Dedicated	3	60	17	28.3%	8	13.3%	Higher rejection rate (13.3%) — more complex accounts processed
Multi-tasking	4	40	9	22.5%	2	5.0%	Lower rejection rate (5.0%) — errors caught at branch more often

Table C: Document Completeness Rate by Individual RM (%)							
RM Name	Workload	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness
Sadia Akter	Multi-tasking	100%	91%	100%	64%	82%	87%
Tousif Uddin Ahmed	Multi-tasking	100%	80%	80%	40%	100%	80%
Nelufa Yeasmin	Multi-tasking	85%	77%	100%	77%	69%	82%
Ferdousy Jesmeen	Dedicated	93%	86%	82%	86%	75%	84%
Touhidur Islam	Dedicated	100%	64%	79%	86%	86%	83%
Ashikur Rahman	Dedicated	94%	78%	78%	72%	89%	82%
Abdullah Barek	Multi-tasking	91%	64%	82%	64%	91%	78%

Analysis 2: Error Rate by Processing Period (Peak vs. Off-Peak)

Table A: Error & Rejection Rate — Peak vs. Off-Peak

Processing Period	Files Processed	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Pre-Check Interceptions	Key Finding
Peak (10:30AM–2PM & 4PM–5:30PM)	73	19	26.0%	8	11.0%	11	Error rate virtually identical to Off-Peak
Off-Peak (9AM–10:30AM & 2PM–4PM)	27	7	25.9%	2	7.4%	5	No statistically meaningful difference

Table B: Cross-Tabulation — Workload × Processing Period

Workload	Processing Period	Files	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Interpretation
Dedicated	Peak	47	14	29.8%	7	14.9%	Highest rejection rate — complex accounts + volume
Dedicated	Off-Peak	13	3	23.1%	1	7.7%	Moderate error rate even when quiet
Multi-tasking	Peak	26	5	19.2%	1	3.8%	Best CPC rejection rate (3.8%) — more errors caught at branch
Multi-tasking	Off-Peak	14	4	28.6%	1	7.1%	Error rate similar to peak — supports systemic cause

Table C: Document Completeness by Processing Period (%)

Processing Period	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness
Peak	93%	78%	86%	75%	79%	82%
Off-Peak	96%	78%	81%	74%	89%	84%

KEY FINDING: *The near-identical error rates during Peak (26.0%) and Off-Peak (25.9%) periods directly contradict the assumption that time pressure drives KYC errors. This finding reframes the root cause as structural and upstream — customers arrive without adequate documentation regardless of the time of day. This shifts the policy recommendation from queue management toward pre-submission intervention (mobile checklists, appointment-based onboarding).*

Analysis 3: KYC Error Rate & Documentation Quality by Account Type

Table A: Error & Rejection Rate by Account Type

Account Type	Files	Avg Docs Required	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Branch Interception Rate	Pre-Check Interceptions	Avg Docs Complete
Savings	27	5	5	18.5%	3	11.1%	40.0%	2	4.26
Current	15	8	5	33.3%	1	6.7%	80.0%	4	4.07
Payroll	58	6	16	27.6%	6	10.3%	62.5%	10	4.10

Table B: Document Completeness by Account Type (%)

Account Type	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness	Weakest Document
Savings	100%	81%	89%	74%	81%	85%	Tax Documents (74%)
Current	100%	73%	73%	80%	80%	81%	Utility Bill & Income Proof (73%)
Payroll	90%	78%	86%	74%	83%	82%	Tax Documents (74%)

Table C: CPC Rejection Reasons by Account Type

Account Type	Missing Signature	Address Mismatch	Insufficient Income/High DBR	Poor CIB Report	Total Rejections
Savings	1	1	1	0	3
Current	1	0	0	0	1
Payroll	2	2	1	1	6
TOTAL	**4**	**3**	**2**	**1**	**10**

KEY FINDING: Current Accounts have the highest error rate (33.3%) driven by complex documentation requirements (8 docs vs 5 for Savings). Their primary failures are Utility Bill and Income Proof completeness (both 73%), reflecting the difficulty of verifying business customers. Payroll Accounts generate the most absolute rework volume (16 errors, 6 rejections) due to sheer volume (58% of files). Tax Documents (e-TIN/PSR) at 74% completeness is the single weakest document type across ALL account categories.

Analysis 4: Monthly KYC Error Trend — November 2025 to February 2026

Table A: Monthly Error & Rejection Trend

Month	Files Processed	Major Errors	Error Rate	CPC Rejections	Rejection Rate	Pre-Check Interceptions	Branch Interception Rate	Avg Docs Complete	Trend Direction
November 2025	28	6	21.4%	3	10.7%	3	50%	4.21	▶ Baseline
December 2025	30	8	26.7%	2	6.7%	6	75%	4.07	▲ Rising (+5.3pp)
January 2026	35	10	28.6%	4	11.4%	6	60%	4.14	▲ Highest (+1.9pp)
February 2026	7	2	28.6%	1	14.3%	1	50%	4.14	— Partial month

Table B: Document Completeness by Month (%)

Month	NID	Utility Bill	Income Proof	Tax Docs	Nominee	Avg Completeness	Notable Change
November 2025	93%	79%	86%	82%	82%	84%	Tax docs strongest this month (82%)
December 2025	97%	80%	80%	70%	80%	81%	Tax docs dropped sharply (-12pp)
January 2026	91%	77%	89%	74%	83%	83%	NID completeness dipped (91%)
February 2026	100%	71%	86%	71%	86%	83%	Utility & Tax weakest (71%) — small sample

Table C: Account Type & Workload Mix by Month

Month	Savings	Current	Payroll	Dedicated RMs	Multi-tasking RMs	Total Files	Possible Explanation for Trend
November 2025	6	3	19	22	6	28	Mostly payroll — lower complexity; more dedicated RMs
December 2025	7	7	16	20	10	30	More Current accounts (higher complexity); more MT RMs
January 2026	12	5	18	15	20	35	Most files; MT RMs dominant; diverse account mix
February 2026	2	0	5	3	4	7	Partial month — small sample, caution in interpretation

KEY FINDING: Error rates rose steadily from 21.4% (November) to 28.6% (January), a 7.2 percentage point increase. This worsening trend coincides with two compounding factors: (1) the proportion of Multi-tasking RMs increased from 21% in November to 57% in January as workloads shifted, and (2) more complex Current and Savings accounts were added to the mix in December-January. Tax document completeness dropped 12pp from November (82%) to December (70%), which is the sharpest single-month deterioration observed across all document types.

Rework & Operational Cost Analysis — Branch & Network-Wide Impact

Table A: Operational Cost per File (BDT)

Efficiency Metric	Error-Free File	File with Branch-Level Rework	File with CPC-Level Rework	Gap (Error-Free vs CPC)	Notes
Processing Time (Touch Time)	1.5 hrs	3.0 hrs	4.5 hrs	3.0 hrs	Each CPC rejection triples RM workload
Turnaround Time (Total Clock)	24 hrs	48 hrs	72–96 hrs	48–72 hrs	Customer cannot use account during delay
Operational Cost (BDT @ 500/hr)	750	1500	2250	1500	Fully-loaded RM rate incl. overhead
Customer Satisfaction Impact	None	Moderate (1 extra contact)	High (1–2 calls + branch visit)	—	Reputational cost not quantified

Table B: Rework Stage Breakdown — This Study (n=100)

Rework Stage	Files (n)	% of Total	Cost Per File (BDT)	Total Cost (BDT)	Avg Turnaround	Customer Impact
No Rework Needed	74	74%	750	55,500	24 hrs	None
Branch-Level Rework	16	16%	1,500	24,000	48 hrs	1 follow-up contact
CPC-Level Rework	10	10%	2,250	22,500	72–96 hrs	Customer recall + branch revisit
TOTAL	**100**	**100%**	—	**102,000**	—	—

Table C: My Pre-Check Contribution to Error Reduction

Metric	Value	Calculation Basis	Implication
Total files with major errors	26	Has Major Error = Yes (n=100)	Base for all rework calculations
Errors caught at branch (pre-check)	16	Major Error=Yes AND CPC Rejection=NO	61.5% of errors resolved before CPC submission
Errors reaching CPC (missed)	**10**	**CPC Rejection = Yes**	**Residual gap — target for digital auto-flagging**
Branch interception rate	**61.5%**	**16 ÷ 26**	**Majority of errors contained at branch level**
Cost saved by pre-check (BDT)	**24000**	**16 files × BDT 1,500**	**Operational waste avoided during internship**
Remaining annual exposure (BDT)	69.7M	149 branches × est. methodology	Network-wide if current error rate continues