

Anti-Money Laundering & Combating Financing of Terrorism Compliance Questionnaire

Part I- General information of Financial Institution	
1	Registered name:
2	Registered address:
3	Registration/license No. and issuing date: (please provide a copy)
4	Establishment date:
5	Head office physical address (if different from the above):
6	Contact details: Name: Title: Address: Tel.: E-mail:
7	Swift:
8	Website:
9	Activities type:
10	Key geographic areas of activity where the financial institution is actively promoting its products.
11	Has your company merged with another firm? Has your company's name changed during the past 5 years? If yes, please provide details.
12	External auditor:
13	Principal local regulator and supervisory body with regard to AML/CFT Compliance programs (if not the same):
	Is your institution a branch or subsidiary of a parent financial institution?
	If your answer to the question above is yes, please specify the relationship type: <input type="checkbox"/> Branch <input type="checkbox"/> subsidiary please go to the next questions about parent financial institution' details:
14	Parent financial institution' details: - Name of parent company: - Registered address: - Physical address: - Swift/Telex: - Website: - Banking license: - Principal local regulator and AML/CFT competent authority (if not the same): - Is parent company listed on any stock exchange? - If yes, on which stock exchange are the shares listed and what the symbol is?

Part II-Ownership and Management information

1	Is your institution listed on any stock exchange?						
2	If your answer to the question above is yes, please indicate the name of stock exchange and its symbol?						
3	<p>If your answer to Part II, item 2, is no, please list full names of shareholders who directly or indirectly own, control or have 5% or more of the shares or voting power of your institution.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; text-align: left;">Full name</th> <th style="width: 40%; text-align: left;">% of ownership share</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="height: 100px;"></td> </tr> </tbody> </table>	Full name	% of ownership share				
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4	Have there been any significant changes in the ownership (exceeding 5%) over the last five years?						
5	If your answer to the question above is yes, please provide details:						
6	<p>Please list the names and positions of the Board of Directors (BOD) members and the Chief Executive Officer(CEO); if your institution is a subsidiary or branch, please also specify the name of the Chief Executive Officer/ General Manager.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%; text-align: left;">Full name</th> <th style="width: 20%; text-align: left;">Nationality</th> <th style="width: 50%; text-align: left;">Position</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="height: 100px;"></td> </tr> </tbody> </table>	Full name	Nationality	Position			
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7	Are there any Politically Exposed Persons (PEPs) associated with your institution, as shareholders, members of the board or senior managers of your institution?						
8	<p>If your answer to the question above is yes, please mention full names and details of PEPs involved.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%; text-align: left;">Full name</th> <th style="width: 60%; text-align: left;">Type of activities or political involvement</th> </tr> </thead> <tbody> <tr> <td colspan="2" style="height: 100px;"></td> </tr> </tbody> </table>	Full name	Type of activities or political involvement				
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Part III-Correspondent Banking Relationships																							
1	Does your financial institution offer correspondent accounts to other domestic or foreign financial institutions?																						
2	<p>If your answer to the question above is yes, please list the names, addresses and primary country of domicile of ten major institutions you offer correspondent accounts in below;</p> <table border="1"> <thead> <tr> <th>Name</th> <th>Address and country of domicile</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Name	Address and country of domicile																				
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3	Does your institution have a policy to reasonably ensure that it only deals with correspondent banks which have license to operate in their respective country of origin?																						
4	Does your institution, as a policy, obtain sufficient information to gain an understanding of your correspondents' business, reputation and regulatory history?																						
5	Does your institution offer "payable through Account" or any other product allowing transaction through Nostro and Vostro accounts? (<i>payable through accounts are type of correspondent banks accounts that are used directly by third parties to transact business on their own behalf.</i>)																						
6	Has your institution established procedures regarding ongoing monitoring of activities conducted through correspondent accounts?																						
7	<p>Does your institution provide financial services to :</p> <ol style="list-style-type: none"> 1) Shell Banks? (<i>a shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group</i>) 2) Offshore banking units? 3) Political and/or public figures? 																						
8	Does your institution have policies to reasonably ensure that your correspondent banks will not conduct transactions on behalf of shell banks?																						

Part IV-Anti money-laundering & combating financing of terrorism regulations, policies and procedures	
1	<p>Has your country (or the country of registration, if different) established laws to prevent and criminalise money- laundering and terrorist financing?</p> <p>Are there effective and dissuasive sanctions available to deal with natural and legal persons that fail to comply with AML/CFT requirements?</p>
2	Is your institution subject and fully compliant with such laws?
3	Do the laws and regulations in your country prohibit your institution from opening anonymous accounts?
4	Has your institution appointed a designated officer/unit that is responsible for coordinating and overseeing the AML framework?
5	Does your institution have AML/CFT compliance program approved by the financial institution's Board of Directors or a designated committee?
6	Does your institution have written AML/CFT policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions?
7	<p>If your answer to the question above is yes, please indicate whether your AML/CFT policies and procedures include the following topics: (please answer following questions just with yes or no)</p> <ul style="list-style-type: none"> - Risk based assessment of customers and their transactions? - Enhanced level of due diligence on those customers identified as having a higher risk profile? - Provide indicators to identify suspicious transactions? - Procedures for detection and reporting of suspicious transactions? - Ensuring that the financial institution only enters into relationships with institutions that possess licenses to operate in their countries of origin? - Reviewing the AML/CFT controls of institutions applying for correspondent banking services before opening an account for them? - Prohibiting accounts/relationships with shell banks? - Governing relationships with Politically Exposed Persons (PEPs)? - Providing regular AML/CFT training to relevant staff, including KYC (Know Your Customer)?
8	Are your institution's policies, procedures and practices being applied to all branches and subsidiaries of your institution both in the home country and in locations outside of that jurisdiction?
9	<p>Does your institution have an internal audit and / or compliance function to test the adequacy of AML/CFT policies and procedures?</p> <p>Please specify the date of latest check.</p>
10	<p>Is Your institution' compliance with AML/CFT policies and procedures regularly checked by external auditors?</p> <p>Please specify the name of external auditor and the date of latest check.</p>
Know your customer (KYC), Due Diligence	
11	<p>Does your institution employ a customer identification program that is designed to obtain and verify information regarding your customers' true identity, source of wealth, economic activity and the nature of anticipated transactional activity?</p> <p>Do you have a record retention procedure?</p>
12	Does your institution identify the ultimate beneficial owners?
13	Does your institution monitor and review customer information regularly?
14	Does your institution take steps to understand the normal and expected transactions of its customers based on its profile/line of business?
15	Does your institution employ third parties to carry out some of the elements of the customer identification program?

Transactions monitoring, risk assessment and suspicious reporting	
16	Does your institution have a monitoring program for suspicious or unusual activity that covers funds transfer and monetary instruments (such as traveler cheques, money orders, etc)? Has your institution ensured that the secrecy law of your country/ institution does not inhibit implementation of STR requirements?
17	Does your institution employ special software to support its monitoring program for suspicious or unusual activity?
18	Have your institution established any procedure regarding on-going monitoring of activities conducted through customer accounts.
19	Does your institution screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/ competent authorities?
20	Does your institution employ third parties to carry out screening and /or monitoring activities?
21	Does your institution provide a risk assessment of its customers' base and their transactions?
22	Does your institution have monitoring procedures for reporting large cash transactions that are above a fixed threshold? What is the threshold?
23	Does your institution have policy or practice for the identification and reporting of transactions that are required to be reported to the authorities?
24	Does your institution have the required system in place to ensure its electronic banking (and wire transfers) are not abused for the purpose of money laundering and financing of terrorism?
25	Does your institution have policies and procedures in place to address risks associated with non-face to face business relationships and transactions?

Please make sure the following documents are attached:

- ✓ Banking license of your institution and Parent company (if applicable);
- ✓ Evidence of any name changes of your institution/Parent company (if applicable) covering the previous 10 years;
- ✓ Top level management structure and full name and position of your institution's / Parent company's Directors and Chief Executive Officer/s;
- ✓ Other relevant information.

I, the undersigned, confirm the validity and accuracy of the information given above.

Name:

Title:

Signature

Date:

Tel/Fax:

E-mail: