

**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. & issuing date:
4	Establishment date:
5	Head Office physical address (if different from the above):
6	Contact details: Name: Title: Address: Tel: Fax: e-mail:
7	SWIFT:
8	Website:
9	GIIN code:
10	Number of employees:
11	Number of full time employees in the AML, CTF & Compliance Department?
12	Number of branches: (Domestic branches: Foreign branches:)
13	Number of subsidiaries:
14	Subsidiaries' information: Nationality (Location of foundation): Contact information : <ul style="list-style-type: none"> ▪ Name ▪ Title ▪ Phone ▪ Fax ▪ E-mail address CEO Information: <ul style="list-style-type: none"> ▪ Name ▪ Passport No. ▪ Phone ▪ Birth of date Principal Business Activity: Regulatory Authority responsible for supervision of Institution: Name of external auditors:
15	Local regulator:

16	AML/CFT authority:
17	Activities type: retail banking <input type="checkbox"/> business banking <input type="checkbox"/> corporate banking <input type="checkbox"/> private banking <input type="checkbox"/> investment banking <input type="checkbox"/>
18	Key geographic areas of activity where the financial institution is actively promoting its products:
19	The nature and purpose of establishment of business relation with the Bank:
20	Has your company merged with another firm? Yes <input type="checkbox"/> No <input type="checkbox"/>
21	Has your company's name changed during the past 5 years? Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please provide details.
22	External Auditor:
23	Principal local regulator and supervisory board with regard to AML/CTF Compliance programs (if not the same):
24	Is your institution a branch or subsidiary of a parent financial institution?
25	If your answer to the question above is yes, please specify the relationship type: <input type="checkbox"/> Branch <input type="checkbox"/> Subsidiary
26	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: -Is your 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 the Part II, item 1 is no, please list full names of shareholders who directly or indirectly own, control or have 25% or more of the shares or voting power of your institution.</p> <table border="1"> <thead> <tr> <th><u>Full name</u></th> <th><u>% of ownership share</u></th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	<u>Full name</u>	<u>% of ownership share</u>				
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4	Have there been any significant changes in the ownership (exceeding 25%) over the last five years?						
5	If your answer to the question above is yes, please provide details:						
6	<p>Please provide information on the current ultimate beneficial owner(s) of your institution?</p> <p>(Beneficial owner refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement. UBO is determined through the following information:</p> <p>A. The identity of the natural person(s) (if any) who directly or indirectly ultimately has a controlling ownership interest on over 25 percent of the ownership in a legal person, or has a managing position in the managing board.</p> <p>B. In case, there is doubt under A as to whether the person(s) with the controlling ownership interest is the beneficial owner(s) or where no natural person exerts control through ownership interests, the identity of the natural person(s) (if any) exercising control of the legal person or arrangement through other means (letter of attorney).</p> <p>C. Where no natural person is identified under A or B above, the identity of the relevant natural person who holds the position of senior managing official).</p>						
7	<p>Please list the names and positions of the Chief Executive Officer (CEO) and executive management; if your institution is a subsidiary or branch, please also specify the name of the Chief executive Officer/General Manager.</p> <table border="1"> <thead> <tr> <th><u>Full Name</u></th> <th><u>Nationality</u></th> <th><u>Position</u></th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	<u>Full Name</u>	<u>Nationality</u>	<u>Position</u>			
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8	Are there any Politically Exposed Persons (PEPs) associated with your institution, as shareholders, members of the board or senior managers of your institution?				
9	<p>If your answer to the question above is yes, please mention full names and details of PEPs involved.</p> <table border="1" data-bbox="225 412 1398 456"> <thead> <tr> <th data-bbox="225 412 842 456">Full name</th> <th data-bbox="842 412 1398 456">Type of activities or political involvement</th> </tr> </thead> <tbody> <tr> <td data-bbox="225 456 842 618"> </td> <td data-bbox="842 456 1398 618"> </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>What institutions are your major correspondents and counterparts?</p> <table border="1" data-bbox="225 898 1102 931"> <thead> <tr> <th data-bbox="225 898 699 931">Name</th> <th data-bbox="699 898 1102 931">Address & country of domicile</th> </tr> </thead> <tbody> <tr> <td data-bbox="225 931 699 1227"> </td> <td data-bbox="699 931 1102 1227"> </td> </tr> </tbody> </table>	Name	Address & country of domicile		
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3	Does your financial institution offer correspondent accounts to other foreign financial institutions which are located in high risk jurisdictions? If yes, please list the names, addresses and primary country of domicile.				
4	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?				
5	Does your institution, as a policy, obtain sufficient information to gain an understanding of your correspondents' business, reputation and regulatory history?				
6	<p>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>)</p> <p>If yes, please explain if your institution has conducted CDD on the customers having direct access to correspondent accounts, and if your institution is able to provide relevant CDD information upon request.</p>				
7	Has your institution established procedures regarding ongoing monitoring of activities conducted through correspondent accounts?				



8	Does your institution provide services to: 1) Shell Banks (<i>a shell bank is defined as a bank incorporated in a jurisdiction in which has no physical presence and which is unaffiliated with a regulated financial group</i>) 2) Offshore banking units? 3) Political and/or public figures?
9	Does your institution have policies to reasonably ensure that your correspondent banks will not conduct transactions on behalf of shell banks?
10	Does your institution provide nested correspondent banking? (e.g. downstream correspondent banking service)

Part IV-Anti Money–Laundering & Combating Financing of Terrorism Regulations, policies and procedures	
1	Has your country (or the country of registration, if different) established laws to prevent and criminalize money-laundering and terrorist financing? Please list the names of the relevant laws. Are there effective and dissuasive sanctions available to deal with natural and legal persons that fail to comply with AML/CFT requirements?
2	Is your institution subject to and fully compliant with such laws?
3	Are your institution’s subsidiaries, if any, subject to and fully compliant with such laws? If no, to which countries’ AML/CFT laws are they subject to and compliant with?
4	Do the laws and regulations in your country prohibit your institution from opening anonymous accounts?
5	Does your FI adhere to FATF, Basel Committee and Wolfsberg Group AML/CFT standards?
6	Has your institution appointed a designated officer/unit that is responsible for coordinating and overseeing the AML Framework? If yes, please provide the following details of responsible officer: Name: _____ Title: _____ Email: _____ Tel: _____ Fax: _____
7	Does your institution have AML/CFT compliance program approved by the financial institution's Board of Directors or a designated committee? If yes, Please provide a copy of applied policies.
8	How often do you review and update your AML/CFT policies?
9	Does your institution have AML/CFT policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions?

10	<ul style="list-style-type: none"> - 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) - Risk Based Assessment of customers and their transactions? - Enhanced level of due diligence on 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?
11	Are your institution's policies, procedures and practices being applied to all branches and subsidiaries of your institution both in the name of home country and in locations outside of that jurisdiction?
12	Does your institution have an internal audit and/or compliance function to test the adequacy of AML/CFT policies and procedures? Please specify the date of latest check?
13	Is your institution's compliance with AML/CFT policies and procedures regularly checked by external auditors? Please specify the name of external auditor and the date of latest check.
14	Do you use external vendors for customer and payment screening activities?
15	If yes, please name the software and mention what controls you use to ensure compliance with AML/CTF and sanctions requirements?
Customer Due Diligence (CDD)	
16	Does your institution employ a customer identification program that is designated to obtain and verify customer's identity, beneficial owner, source of wealth, economic activity, and purpose and intended nature of the business relationship using reliable, independent source documents, data or information?
17	Does your institution apply a risk-based approach to perform CDD? If yes, please elaborate on your risk model, and describe which categories of customers or industries are subject to enhanced due diligence measures (EDD) and which categories are restricted, or prohibited?
18	Please provide your records keeping periods for customer records, transaction records, external reporting and staff training.
19	Does your institution monitor and review customer information regularly?
20	Does your institution take steps to understand the normal and expected transactions of its customers based on its profile/line of business?
21	Does your institution employ third parties to carry out some of the elements of the customer identification program?
22	Does your institution provide services to one-off customers? If yes, how does your institution identify these customers?
23	Please briefly describe your procedures for identification of ultimate beneficial owners, verification of source of funds, and understanding the expected activity of your customers.
Transaction monitoring, risk assessment and suspicious reporting	
24	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?
25	Does your institution employ special software to support its monitoring program for suspicious or unusual activity?
26	Have your institution established any procedure regarding on-going monitoring of activities conducted through customer accounts?
27	Does your institution screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/competent authorities? If yes, please mention if the screening is done automated or manually Please provide the sanctions list you check the clients against? (eg OFAC, UN, EU....).
28	Does your institution employ third parties to carry out screening and/or monitoring activities?
29	Does your institution provide a risk assessment of its customers' base and their transactions? If yes, please elaborate on your risk model
30	Does your institution have monitoring procedures for reporting large cash transactions that are above a designated threshold? What is the threshold?
31	Does your institution have policy or practice for the identification and reporting of transactions that are required to be reported to the authorities?
32	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?
33	Does your institution identify the source of funds in transactions being made to EDBI?
34	Does your institution have policies and procedures in place to address risks associated with non-face to face business relationships and transactions?
35	In the past five years, has any action been brought against your institution resulting from violations of laws or regulations concerning money laundering or terrorist financing? If yes, please provide details.

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;
- Other relevant information

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

Name:

Title:

Signature:

Date:

Tel/Fax:

E-mail: