

Anti-Money Laundering Questionnaire

PART I- General Information of Financial Institution	
1	Registered name: Export Development Bank of Iran (EDBI)
2	Registered address: 129, Khaled Eslamboli Ave, Tehran, Iran
3	Registration /License No. & Issuing date: 86936 24-Nov-1991
4	Establishment date: 24-Nov-1991
5	Head office physical address (if different from the above): No. 26, EDBI Tower, 15 th , St., Bucharest Ave., Argentina Square, Tehran, 1513835711 Iran
6	Contact details: Name: Mr. Seyed Kambiz Seyedan Title: Head of AML/CFT and Compliance Dept Address: No. 26, EDBI Tower, 15 th St., Bucharest Ave., Argentina Square, Tehran 1513835711, Iran Tel: +98 21 88700911 Fax: +98 21 88702136 E-mail: kambiz.seyed@edbi.ir
7	SWIFT: EDBIIRTH (inactive)
8	Website: www.edbi.ir
9	Activities type: Specialized fully Government-owned bank, to finance export of non-oil goods and other technical and engineering services of Iranian origin
10	Key geographic areas of activity where the financial institution is actively promoting its products: Middle East, Central & East Asia, Africa and Latin America
11	Has your company merged with another firm? Has your company's name changed during the past 5 years? If yes, please provide details. No
12	External Auditor: Audit Organization (of Iran)
13	Principal local regulator and supervisory board with regard to AML/CTF Compliance programs (if not the same): Central Bank of Iran and IRI FIU (Financial Intelligence Unit)
	Is your institution a branch or subsidiary of a parent financial institution? No
	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 question about parent financial institution details:
14	Parental financial institution details: Not Applicable -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? No

2 If your answer to the question above is yes, please indicate the name of stock exchange and its symbol:

3 If your answer to the 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.

Full name	% of ownership share
The Government of Iran	100%

4 Have there been any significant changes in the ownership (exceeding 5%) over the last five years? No

5 If your answer to the question above is yes, please provide details:

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 Managers.

A) CURRENT BOARD OF DIRECTORS

	SURNAME AND GIVEN NAMES	POSITION	NATIONALITY
1	Soroush, Aboozar	Chairman of the Board	Iranian
2	Salehabadi, Ali	Board Member and Managing Director	Iranian
3	Mazdeh, Mohammad Jafar	Board Member, Executive	Iranian
4	Fallahfar, Ehtesham	Board Member, Non-executive	Iranian
5	Narges Najafi	Board Member, Non-executive	Iranian

B) EXECUTIVE COMMITTEE

	SURNAME AND GIVEN NAMES	POSITION	NATIONALITY
1	Maboudi, Hamidreza	Deputy of International Affairs Division Member of Executive Committee	Iranian
2	Kharazi Moghadam , Valiollah	Deputy of Financial Affairs Division Member of Executive Committee	Iranian
3	Saedifar, Reza	Deputy of Credit Affairs Division Member of Executive	Iranian

			Committee	
4	Zekavat, Seyed Morteza	Deputy of Information Technology affairs Member of Executive Committee		Iranian
5	Ahmadi Ali	Deputy of supervision and internal control Member of Executive Committee		Iranian
7	Are there any Politically Exposed Persons (PEPs) associated with your institution, as shareholders, members of the board or senior managers of your institution? No			
8	If your answer to the question above is yes, please mention full names and details of PEPs involved.			
	Full name	Type of activities or political involvement		

Part III- Correspondent Banking Relationships

1	Does your financial institution offer correspondent accounts to other domestic or foreign financial institutions? Yes				
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" data-bbox="227 516 1403 562"> <thead> <tr> <th data-bbox="227 516 729 562">Name</th> <th data-bbox="736 516 1403 562">Address & country of domicile</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="227 585 1403 631">Some foreign and Iranian banks</td> </tr> </tbody> </table>	Name	Address & country of domicile	Some foreign and Iranian banks	
Name	Address & country of domicile				
Some foreign and Iranian banks					
3	Does your institution have policy to reasonably ensure that it only deals with correspondent banks which have license to operate in their respective country of origin? Yes				
4	Does your institution, as a policy, obtain sufficient information to gain an understanding of your correspondents' business, reputation and regulatory history? Yes				
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> No				
6	Has your institution established procedures regarding ongoing monitoring of activities conducted through correspondent accounts? Yes				
7	<p>Does your institution provide services to:</p> <p>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> No</p> <p>2-Offshore banking units? No</p> <p>3-Political and/or public figures? Yes</p>				
8	Does your institution have policies to reasonably ensure that your correspondent banks will not conduct transactions on behalf of shell banks? Yes				

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? Yes Are there effective and dissuasive sanctions available to deal with natural and legal persons that fail to comply with AML/CFT requirements? Yes
2	Is your institution subject and fully compliant with such laws? Yes
3	Do the laws and regulations in your country prohibit your institution from opening anonymous accounts? Yes
4	Has your institution appointed a designated officer/unit that is responsible for coordinating and overseeing the AML Framework? Yes
5	Does your institution have AML/CFT compliance program approved by the financial institution's Board of Directors or a designated committee? Yes
6	Does your institution have AML/CFT policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions? Yes
7	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) <ul style="list-style-type: none"> - Risk Based Assessment of customers and their transactions? Yes - Enhanced level of due diligence on customers identified as having a higher risk profile? Yes - Provide indicators to identify suspicious transactions? Yes - Procedures for detection and reporting of suspicious transactions? Yes - Ensuring that the financial institution only enters into relationships with institutions that possess licenses to operate in their countries of origin? Yes - Reviewing the AML/CFT controls of institutions applying for correspondent banking services before opening an account for them? Yes - Prohibiting accounts/relationships with shell banks? Yes - Governing relationships with Politically Exposed Persons (PEPs)? Yes - Providing regular AML/CFT training to relevant staff, including KYC (Know your customer)? Yes
8	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? Yes
9	Does your institution have an internal audit and/or compliance function to test the adequacy of AML/CFT policies and procedures? Yes Please specify the date of latest check? March first , 2021
10	Is your institution's compliance with AML/CFT policies and procedures regularly checked by external auditors? Yes Please specify the name of external auditor and the date of latest check. Central Bank of Iran- January24th, 2021

Know your customer (KYC), Due Diligence	
11	Does your institution employ a customer identification program that is designated to obtain and verify information regarding your customers' true identity, source of wealth, economic activity and the nature of anticipated transactional activity? Yes Do you have a record retention procedure? Yes
12	Does your institution identify the ultimate beneficial owners? Yes
13	Does your institution monitor and review customer information regularly? Yes
14	Does your institution take steps to understand the normal and expected transactions of its customers based on its profile/line of business? Yes
15	Does your institution employ third parties to carry out some of the elements of the customer identification program? No
Transaction 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)? Yes Has your institution ensured that the secrecy law of your country/institution does not inhibit implementation of STR requirements? Yes
17	Does your institution employ special software to support its monitoring program for suspicious or unusual activity? Yes
18	Have your institution established any procedure regarding on-going monitoring of activities conducted through customer accounts? Yes
19	Does your institution screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/competent authorities? Yes
20	Does your institution employ third parties to carry out screening and/or monitoring activities? No
21	Does your institution provide a risk assessment of its customers' base and their transactions? Yes
22	Does your institution have monitoring procedures for reporting large cash transactions that are above a fixed threshold? What is the threshold? Yes, cash transactions exceeding IRR 150,000,000 must be reported to the FIU (Financial Intelligence Unit)
23	Does your institution have policy or practice for the identification and reporting of transactions that are required to be reported to the authorities? Yes
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? Yes
25	Does your institution have policies and procedures in place to address risks associated with non-face to face business relationships and transactions? Yes

Please make sure the following documents are attached:

- Banking license of your institution and Parent company (if applicable): (Enclosure 1)
- Evidence of any name changes of your institution/parent company (if applicable) covering the previous 10 years: (Not Applicable)
- Top level management structure and full name and position of your institution's/parent company's directors and chief executive officer/s: (Please refer to Part II, 6)
- Relevant information (Please contact us if required)

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

Name: Seyed Kambiz Seyedan

Title: Mr.

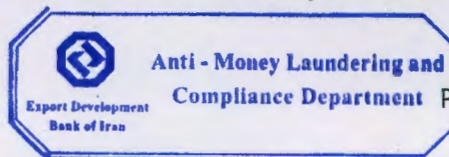
Date: April 20th, 2021

K. Seyedan.

Tel: +98 21 88700911

Fax: +98 21 88702136

E-mail: Kambiz.seyedana@edbi.ir





BANK MARKAZI JOMHOURI ISLAMI IRAN
(The Central Bank of the Islamic Republic of Iran)

Vice Governor

No , 328772

Date: 30 Jan 2014

To Whom It May Concern

This is to certify that "Export Development Bank of IRAN", a public joint stock company, has been registered with the "Department of Registration of Companies and Non-Commercial Institutes" in Iran under No.86936 as of 24th Nov. 1991.

In accordance with the license, "Export Development Bank of Iran" as a specialized fully-state-owned bank with the mission of enhancing country's export capabilities is authorized to engage in all banking activities, including foreign exchange transactions and international banking. The bank is supervised and regulated by the Central Bank of the Islamic Republic of Iran. /1847908

Yours sincerely,

H. Tehranfar,
Vice Governor

Form N/508 - 58 c. 1001 - 83/3

P. O. BOX : 15875/7177 Mirdamad Blvd., NO. 144
Tehran. ISLAMIC REPUBLIC OF IRAN
Cable : MARKAZBANK Tel 20951 Telex : 213063-8 MZBK IR
General E-Mail Address : G-secdept @ CBI. IR

Enclosure 1