

Anti-Money Laundering / Anti- Terrorist Financing Questionnaire

I. Customer Information :

Legal name of Institution :

Principal place of business (address), web address:

Corporate legal form :

Registration Number (Fiscal/Unique Code):

Banking license:

Proof of Incorporation :

Name of ultimate parent institution (if applicable):

Parent Institution's Physical Address :

Relationship with parent (agency / branch / subsidiary):

Jurisdiction of licensing authority and regulator of parent:

Name of Banking Supervision:

Registration/License?

Authority which issues banking license:

Number of branches: domestic, foreign

Name of external auditors:

Official Authority of reporting in case of suspicion of ML or FT:

Main Shareholders and their ownership interest (%)

Executive President & CEO:

Has your institution appointed a compliance officer for AML/CFT/KYC? YES /NO

Name :

Phone number :

E-mail address :

Authorized Officer responsible for the establishment of Correspondent Banking/Account relationship

II. General AML Policies, Practices and Procedures

YES

NO

1. Has the country in which you are located established laws designed to prevent money laundering and terrorism financing?

2. Does the law require banks to have procedures for the prevention of money laundering and terrorism financing?

3. Does your country adhere to the 40 anti-money laundering recommendations and 9 special terrorist financing

recommendations developed by the Financial Action Task Force (FATF)?								
4. Does the FI have a legal and regulatory compliance program that requires approval of the FI's Board or a senior committee thereof?								
5. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?								
6. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?								
7. In case your institution does not have such regulations, are they planned to be introduced? Please indicate the estimated date of its implementation.								
8. Has your institution been subject of any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorism financing in the past five years?								
9. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?								
10. Does the FI have a policy prohibiting accounts/relationships with shell banks? (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.)								
11. Does your institution provide services to offshore banks, internet banks type institutions or banks located in high-risk area, as per FATF Recommendations?								
12. Does the FI have policies covering relationships with politically exposed persons, their family and close associates consistent with industry best practices?								
13. Does your institution have a Code of Conduct and representations by their employees of their understanding and agreement to abide by the Code of Conduct including AML provisions?								
14. Does the FI have record retention procedures that comply with applicable law?								
15. Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?								
<p>16. Does the FI have foreign branches and/or subsidiaries engaged in banking or non banking financial activities that are subject to the FI AML Policies?</p> <p>16.a) If Yes, are these branches and/or subsidiaries subject to the anti – money laundering laws applicable to the FI head office?</p> <p>16.b) If No, please provide information for each foreign branch/subsidiary below:</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 20%;">Country</th> <th style="text-align: left; width: 30%;">Government Institution</th> <th style="text-align: left; width: 50%;">Is your institution subject to and fully compliant with local country's laws design to prevent money laundering and terrorist financing. <input type="checkbox"/>Yes <input type="checkbox"/> No</th> </tr> </thead> <tbody> <tr> <td>_____</td> <td>_____</td> <td>_____</td> </tr> </tbody> </table>	Country	Government Institution	Is your institution subject to and fully compliant with local country's laws design to prevent money laundering and terrorist financing. <input type="checkbox"/> Yes <input type="checkbox"/> No	_____	_____	_____		
Country	Government Institution	Is your institution subject to and fully compliant with local country's laws design to prevent money laundering and terrorist financing. <input type="checkbox"/> Yes <input type="checkbox"/> No						
_____	_____	_____						
	<input type="checkbox"/> Yes <input type="checkbox"/> No							

_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No		
_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No		
<input type="checkbox"/> Branch subject to the stricter of HO laws or host country laws				
III. Risk Assessment				
17. Does the FI have a risk based assessment of its customer base and transactions of its customers?				
18. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?				
19. Does the FI have proper system put in place to track transactions on the basis of risk classification of countries and do not entertain transactions with high risk categorized countries?				
IV. Know Your Customer, Due Diligence and Enhanced Due Diligence				
20. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. <i>(for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?</i>				
21. Does your AML/CFT/KYC Policies and Procedures require: <ul style="list-style-type: none"> a. recognizing the true identity of customers and checking their legitimacy before transacting any business with them? b. identifying any third party that makes use of correspondent banking services? c. monitoring client activity to detect suspicious activity and due diligence?; d. reporting suspicious activities and transactions to the appropriate AML/CFT/KYC authorities? e. keeping all the records related to customer identification and their transactions? For how long? 				
22. Does your AML/CFT/KYC Policies and Procedures allow to: <ul style="list-style-type: none"> a. open or maintain of anonymous accounts? b. conduct business with the banks having no physical presence in any country of Jurisdiction - shell banks? c. maintain currently accounts for shell banks? 				
23. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?				
24. Does the FI have a requirement to collect information regarding its customers' business activities?				
25. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know your Customer" information?				
26. Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?				
27. Does the FI have process to review and, where appropriate, update customer information relating to high risk client information?				
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds				
28. Does your institution have policies or practices for the identification and reporting of transactions that are required to be				

reported to the authorities?		
29. Where cash transaction reporting is mandatory, does your institution have policies and procedures to identify transactions structured to avoid such obligations?		
30. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?		
31. Does the FI have policies to reasonably ensure that transactions are not conducted with countries that appear as sanctioned entities on lists provided by government/international bodies?		
32. Does your institution have policies and procedures to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
33. Does your institution have policies and procedures to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
34. Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FIs that do not comply with industry best practices?		
VI. Transaction Monitoring		
35. Does your institution have a monitoring program for suspicious or unusual activities that covers funds transfers (incoming and outgoing), and monetary instruments (such as travellers checks, money orders, etc.)?		
VII. AML Training		
36. Does your institution provide AML awareness training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services, internal policies to prevent money laundering as well as the process to report suspicious transactions?		
37. Does your institution retain records of its training sessions including attendance records and relevant training materials used?		
38. Does your institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
39. Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?		