

**Financial Institution Name:**

**Account No.:**

### Anti-Money Laundering Questionnaire

If you answer "NO" to any question, an explanation must be supplied at the end of the questionnaire.

| <b>A. General AML Policies, Practices and Procedures:</b>  | <b>YES</b>               | <b>NO</b>                |
|--|--------------------------|--------------------------|
| 1. Is the AML compliance program approved by either the FI's board or a senior committee?  | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?  | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious  | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. In addition to inspections by the government supervisors / regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?  | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks? (A shell bank is a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.) | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?  | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their families and close associates?  | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Does the FI have record keeping procedures that comply with applicable law?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?  | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>B. Risk Assessment:</b>  | <b>YES</b>               | <b>NO</b>                |
|---|--------------------------|--------------------------|
| 10. Does the FI have a risk-based assessment of its customer base and their transactions?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. 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? | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>C. Know Your Client, Due Diligence and Enhanced Due Diligence:</b>  | <b>YES</b>               | <b>NO</b>                |
|--|--------------------------|--------------------------|
| 12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Does the FI have a requirement and procedure to collect information regarding its customers' source of wealth and source of funds?                     | <input type="checkbox"/> | <input type="checkbox"/> |

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|--|--------------------------|--------------------------|
| 14. Does the FI assess its FI customers' AML policies and practices?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Does the FI have on-going processes to review and, where appropriate, update client information?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information? | <input type="checkbox"/> | <input type="checkbox"/> |
| 17. Does the FI complete a risk-based assessment to understand the normal and expected transaction of its customers?   | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>D. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:</b>  | <b>YES</b>               | <b>NO</b>                |
|--|--------------------------|--------------------------|
| 18. Does the FI have policies or practices for identifying and reporting transactions that are suspicious or required to be reported to the authorities? | <input type="checkbox"/> | <input type="checkbox"/> |
| 19. Does the FI screen customers and transactions against lists of persons, entities or countries issued by relevant authorities?                        | <input type="checkbox"/> | <input type="checkbox"/> |
| 20. Does the FI have policies to reasonably ensure that it only operates with FI that possess licenses to operate in their jurisdiction of origin?       | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>E. Transaction Monitoring:</b>   | <b>YES</b>               | <b>NO</b>                |
|---|--------------------------|--------------------------|
| 21. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc? | <input type="checkbox"/> | <input type="checkbox"/> |

| <b>F. AML Training</b>   | <b>YES</b>               | <b>NO</b>                |
|--|--------------------------|--------------------------|
| 22. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to regulatory authorities.</li> <li>• Examples of different forms of money laundering involving FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul> | <input type="checkbox"/> | <input type="checkbox"/> |
| 23. Does the FI retain records of its training sessions including attendance records and relevant training materials used?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 24. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 25. Does the FI employ third parties to carry out some of the functions of the FI?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 26. If the answer to question 25 is yes, does the FI provide AML training to relevant third parties that includes the sections stated as question 22?  | <input type="checkbox"/> | <input type="checkbox"/> |

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| <b>Additional Information</b> (please indicate which question information is referring to): |
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|---|
| <b>Name</b>                                 |
| <b>Title:</b>                               |
| <b>Signature and Official Company Chop:</b> |
| <b>Date:</b>                                |