

## Wolfsberg Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

<b>I. General AML Policies, Practices and Procedures</b>	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	<input checked="" 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 checked="" 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 transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Does the FI have a policy prohibiting accounts/relationships with 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> )	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>II. Risk Assessment</b>	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<b><u>Yes</u></b>	<b><u>No</u></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 checked="" type="checkbox"/>	<input type="checkbox"/>
13. Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Does the FI assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	<b><u>Yes</u></b>	<b><u>No</u></b>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats <sup>1</sup> ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>



<sup>1</sup> The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any

<i>V. Transaction Monitoring</i>		<u>Yes</u>	<u>No</u>
23. 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<i>VI. AML Training</i>		<u>Yes</u>	<u>No</u>
24. Does the FI provide AML training to relevant employees that includes:		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>○ Identification and reporting of transactions that must be reported to government authorities.</li> <li>○ Examples of different forms of money laundering involving the FI's products and services.</li> <li>○ Internal policies to prevent money laundering.</li> </ul>			
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
28. If the answer to question 27 is Yes, does the FI provide AML training to relevant third parties that includes:		YES	
<ul style="list-style-type: none"> <li>○ Identification and reporting of transactions that must be reported to government authorities.</li> <li>○ Examples of different forms of money laundering involving the FI's products and services.</li> <li>○ Internal policies to prevent money laundering.</li> </ul>			

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Space for additional information:

*(Please indicate which question the information is referring to.)*

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particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles.  
Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg\\_NYCH\\_Statement\\_on\\_Payment\\_Message\\_Standards\\_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)



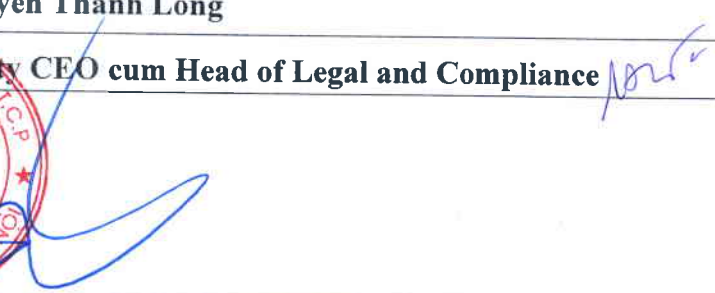


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<b>Name: Nguyen Thanh Long</b>
<b>Title: Deputy CEO cum Head of Legal and Compliance</b>
<b>Signature:</b> 
<b>Date: February 8<sup>th</sup>, 2018</b>

