

KNOW YOUR CUSTOMER AND ANTI-MONEY LAUNDERING
WOLFSBERG GROUP QUESTIONNAIRE

Sr. No.	Questionnaire	Response
1.	Website Address:	
2.	Name of the Local Licensing Authority/Banking Regulator	
3.	Head Office Address	
4.	Head Office Website Address	
5.	Name of Head Office Licensing Authority/Banking Regulator	

SECTION – II- WOLFSBERG QUESTIONNAIRE

GENERAL AML POLICIES, PRACTICES AND PROCEDURES

Sr.No.	Questionnaire	Response	
1.	Is the AML Compliance program approved by the FI's Board or a Senior Committee?	YES	NO
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for co-ordinating and overseeing the AML framework	YES	NO
3.	Has the FI formulated written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES	NO
4.	In addition to inspections by the Government supervisors/regulators, does the FI client have an internal audit function or other independent third party who assesses AML policies and practices on a regular basis?	YES	NO
5.	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)	YES	NO
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?	YES	NO
7.	Does the FI have policies covering relationships with politically exposed persons (PEP's), their family and close associates?	YES	NO
8.	Does the FI have record retention procedures that comply with applicable law?	YES	NO
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?	YES	NO

RISK ASSESSMENT

Sr.No.	Questionnaire	Response	
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	YES	NO
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?	YES	NO
12.	Has the FI implemented processes for the identification of those customers who maintain or operate accounts or conduct transactions?	YES	NO
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	YES	NO
14.	Does the FI, assess its FI customers' AML Policies or practices?	YES	NO
15.	Does the FI have a process to review and where appropriate, update customer information relating to high risk client information?	YES	NO
16.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	YES	NO
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES	NO
18.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES	NO
19.	Where cash transaction reporting is mandatory, Does the FI have procedures to identify transactions structured to avoid such obligations?	YES	NO
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by Government/competent authorities?	YES	NO
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?	YES	NO

TRANSACTION MONITORING

Sr.No.	Questionnaire	Response	
22.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travellers checks, money orders, etc.	YES	NO
23.	Does the FI provide AML Training to relevant employees that includes: <ul style="list-style-type: none"> • 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 	YES	NO

Sr.No.	Questionnaire	Response	
24.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES	NO
25.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES	NO
26.	Does the FI employ third parties to carry out some of the functions of the FI?	YES	NO
27.	If the answer to question 26 is Yes. Does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to Government authorities. • Examples of difference forms of Money Laundering involving the FI's products and services. • Internal policies to prevent Money Laundering. 	YES	NO

SECTION – III – SUPPLEMENTARY QUESTIONS

Sr.No.	Questionnaire	Response	
28.	Does the FI have any anonymous or numbered Accounts?	YES	NO
29.	Does the FI maintain nested accounts (i.e. do you allow your customers/other financial institutions direct access to your accounts held with us)? If yes, please provide YES/NO Answers to Questions (A) to (C). (YES/NO) A) Do you verify the identity of such Bank customers and conduct additional due diligence on them? B) Please confirm you conduct ongoing monitoring on these customers. C) Do you identify the owners of the Banks that maintain nested accounts. If its shares not publicly traded?	YES	NO
30.	Does the FI maintain correspondent Banking relationships with another FI who allows direct use of their correspondent account by third parties to transact business on their behalf (i.e. payable through account or nested account)?	YES	NO
31.	Does the FI by the following definition hold an offshore banking License? (License to conduct banking activities which as a condition of the license, prohibits the licensed entity from conducting banking activities with the citizens of, or in the local currency of, the country which issued the license).	YES	NO
32.	Does the FI have specific systems and controls in place to screen transactions for customers or transactions deemed to be of significant high risk (which may include persons, entities or countries) against lists issued by Government/International bodies/competent authorities, which include (please provide YES/NO Answer to each question (A) to (E) below): A) UK B) EU C) US D) UN E) Other Local Regulation	A) YES B) YES C) YES D) YES E) YES	NO NO NO NO NO

Space for additional information:
Please indicate which question the information is referring

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Name	
Title	
Signature	
Date	