

Does your institution have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?

Yes No

Does the company have a written AML Program and written policies in place documenting the processes to prevent, detect and report suspicious transactions?

Yes No

Does your institution have record retention procedures that comply with applicable law?

Yes No

Are your institution's AML policies and practices being applied to all branches and subsidiaries of the institution both in the home country and in locations outside of that jurisdiction?

Yes No

RISK ASSESSMENT AND DUE DILIGENCE

Has your institution implemented processes for the identification of customers on whose behalf it maintains or operates accounts or conducts transactions?

Yes No

Does your Institution have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?

Yes No

Does your Institution complete a risk-based assessment to understand the normal and expected transactions of its customers?

Yes No

Does your Institution have a requirement to collect information regarding its customers' business activities?

Yes No

Do you perform a risk-based assessment of your customer base and their transactions?

Yes No

Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that pose a heightened risk of illicit activities?

Yes No

TRANSACTION MONITORING AND REPORTING

Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?

Yes No

Do you have an automated system in place for monitoring unusual/suspicious activity?

If yes, please provide details of the system you use. If no, please provide details as to how transaction monitoring is done.

Yes No

AML FUNCTION AND TRAINING

Number of employees devoted to AML Compliance full time (please provide details):

Does your Institution provide AML 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 Institution's products and services
- Internal policies to prevent money laundering

Yes No

Does your Institution retain records of its training sessions including attendance records and relevant training materials used?

Yes No

Does your Institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?

Yes No

Does your Institution employ third parties to carry out some of the functions of the Institution?

Yes No

If yes, does your Institution provide AML training to relevant third parties that includes:

Identification and reporting of transactions that must be reported to government authorities. Examples of different forms of money laundering involving the Institution's products and services. Internal policies to prevent money laundering

Yes No

RECENT AUDITS, REGULATORY FINDINGS/FINES AND/OR REMEDIAL ACTIONS

Date of last audit and any material findings related to AML Compliance (please provide details):

Date of last regulatory visit and any material findings related to AML Compliance (please provide details):

Any material regulatory findings/fines and remedial actions undertaken in the last 5 years (please provide details):

Name

Title

Signature

Date