

## FINANCIAL INSTITUTION QUESTIONNAIRE

<i>I. General informations about the Financial Institution (FI)</i>	
1.1	<b>Official name of the FI</b> <b>Complete name:</b> <b>Short name:</b>
1.2	<b>Organizational-legal form</b>
1.3	<b>Registration:</b> Number Date of issue Name of issuing authority
1.4	<b>Tax identification number</b>
1.5	<b>Banking supervisory authority</b>
1.6	<b>License to conduct banking operations:</b> Number Date of issue Name of the issuing authority Operations allowed Valid till
1.7	<b>Data on the value of registered and paid-up share capital</b>
1.8	<b>Address of the head office</b>
1.9	<b>Legal address</b>
1.10	<b>Postal address</b>
1.11	<b>Contact details (phone, fax, e-mail, website)</b>
1.12	<b>Contact person for relations with financial institutions (name, phone, e-mail)</b>
1.13	<b>REUTERS code</b>
1.14	<b>BLOOMBERG code</b>
1.15	<b>Identification code for FATCA (GIIN)</b>
1.16	<b>SWIFT/ T.E.L.E.X</b>
1.17	<b>List of LORO accounts</b>
1.18	<b>List of NOSTRO accounts</b>
1.19	<b>Number of branches and agencies</b>
1.20	<b>Name of the audit company</b>
1.21	<b>Information about the IF in</b> <b>"Bankers Almanac"</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <b>"Reed Business Information"</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <b>"SWIFT KYC Registry"</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <b>other</b>
1.22	<b>Participation in the deposit insurance system (if applicable)</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable

<i>II. Information about owners, management bodies and FI activity</i>																									
2.1	<b>Name of legal or individual persons holding or controlling a holding greater than or equal to 1% of the shares of the FI (if they hold a smaller quota, please name the five largest shareholders, indicating the share they held).</b>  Individuals: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Last name, first name</th> <th style="width: 20%;">Country of residence</th> <th style="width: 20%;">Shareholding, %</th> <th style="width: 30%;">Entitled to vote, %</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Last name, first name	Country of residence	Shareholding, %	Entitled to vote, %																				
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	<p>Legal entities:</p> <table border="1"> <thead> <tr> <th>Name of shareholders</th> <th>Type of activity</th> <th>Country of residence</th> <th>Shareholding, %</th> <th>Entitled to vote, %</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Name of shareholders	Type of activity	Country of residence	Shareholding, %	Entitled to vote, %																							
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2.2	<p><b>Information on the identity of the beneficial owner, who exercises final control over the activity of the financial institution (holds over 25% of the bank's shares).</b></p> <p><input type="checkbox"/> The FI does not have a beneficial owner (no individual person owns at least 25% of the ownership of the company), but I agree to present information about the owners I know</p> <p><input type="checkbox"/> The FI has the following actual beneficiaries of operations in / from the account:</p> <p>Last name, first name: _____</p> <p>Date and place of birth: _____</p> <p>Personal identification number: _____</p> <p>Passport / Identity card: _____</p> <p>The issuing authority: - _____</p> <p>Address: (street, city, country) _____</p> <p>Politically exposed (Yes / No) - _____</p>																												
2.3	<p><b>Information on the parent company, affiliation with any corporation, holding, financial-industrial group or other association, whose member is the FI (bank).</b></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If YES, please indicate below:</p>																												
2.4	<p><b>Information on the presence or absence of the permanent management body at the FI headquarters.</b></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>																												
2.5	<p><b>Information on the structure and competence of the management body:</b></p> <table border="1"> <thead> <tr> <th>First name, last name</th> <th>Date of birth</th> <th>Country of residence</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	First name, last name	Date of birth	Country of residence	Position																								
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<p><b>III. Information on the program on preventing and combating money laundering and terrorism financing</b></p>																													
3.1	<p><b>Policies, Procedures and Practices on combating money laundering and terrorism financing (AML/CFT):</b></p>																												
3.1.1	<p>Please indicate the name and web address of the public institution which has control over compliance with laws and regulations aimed at preventing and combating money laundering and terrorist financing.</p>																												

	1 _____ 2 _____ 3 _____	
3.1.2	Please specify the national laws and regulations in force, aimed at preventing and combating money laundering and terrorist financing, as well as the approval body and the date of their approval / entry into force. 1 _____ 2 _____ 3 _____	
3.1.3	Please indicate the internal regulations governing the activity of preventing and combating money laundering and terrorism financing, as well as the approval body and the date of approval/entry into force: 1 _____ 2 _____ 3 _____	
3.1.4	Has the financial institution implemented the FATF Recommendations (40 + 9)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.5	Does the FI's Program contains provisions on the existence within the institution of a responsible person in the field of AML/CFT, as well as its responsibilities for ensuring supervision and measures for implementation of the Program? If Yes, please provide the contact details of the responsible person concerning AML/CFT (name, surname, position, phone, fax, e-mail.): _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.6	Does the FI's Program contains provisions on the existence within the institution of an independent and specialized subdivision/service, responsible for performing the activity on AML/CFT? a) Please Indicate the number of employees of the division / service specialized in AML/CFT: _____ b) Please Indicate the name of the specialized division / service in AML/CFT and the leader's contact details (name, surname, position, phone, fax, e-mail):	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.7	Does FI Program contain requirements that regulate the process of preventing, detecting and reporting suspicious transactions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.8	Is there established within the FI a position of internal audit or an independent 3rd person who systematically performs evaluations of internal AML/CFT policies and procedures?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.9	Does the FI Program provide procedures that regulate the business relationship with politically exposed persons?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.10	Does the FI Program contain provisions regarding the possession and storage of information? What is the information storage term: _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.1.11	Are the FI's AML/CFT policies, practices and procedures applied to all subsidiaries / branches and subdivisions of the institution both in the country and abroad?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3.2</b>	<b>Risk evaluation</b>	
3.2.1	Does the FI apply the risk-based approach to its customers and their performed transactions? Based on how many levels of risk are FI's clients classified: _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.2.2	Does the FI perform a general risk evaluation which involves identifying and assessing risks relating to money laundering and terrorist financing? Please indicate the periodicity of the evaluation: _____	<input type="checkbox"/> Yes <input type="checkbox"/> No

<b>3.3</b>	<b>"Know Your Customer" Rules</b>	
3.3.1	Are the "Know Your Customer" Rule/Policy followed within your FI?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.2	Does the FI perform the identification and identity verification of all customers as well as beneficiary owners at the establishment of business relationships or until the accounts are opened?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.2.1.	Does the identification and verification of the identity of individuals or legal persons, of the beneficial owner based on identity documents take place within the FI? * If "Yes", please indicate how the procedure for identifying customers and beneficial owners is performed:	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.2.2	Does the FI identify the beneficial owner and take appropriate and risk-based measures to verify his identity, so that the reporting entity has, the certainty that it knows who the beneficial owner is in order to understand the ownership and control structure of individuals and legal entities?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.2.3	Does the FI get information on the purpose and nature of the business relationship, on complex and unusual transactions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.3	Does FI identify all customers at the performing of some occasional transactions, as well as performing of some electronic transactions, whether the transaction is carried out in a single operation or several operations?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.4	Does FI perform the updating of information obtained at clients' identification? Indicate the updating frequency : _____	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.5	In the cases listed below, the IF undertakes more identification measures than the standard ones (additional / increased): - The individual or the legal/entity is not present at identification, - In cross-border banking relationships, - In business relationships or transactions with politically exposed persons.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.6	Does the FI apply increased precautions to its customers or transactions considered to be of high risk?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.3.7	In transactions or business relations with politically exposed persons, the financial institution shall ensure:	
	Appropriate risk-based procedures for determining whether a person is politically exposed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Obtaining the approval of senior management (or FI administrators) for establishing or continuing business relationships with such persons?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Taking appropriate measures to establish the source of the goods involved in the business relationship or in the transactions carried out?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Carrying out an increased and permanent monitoring of the business relationship.	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3.4</b>	<b>Transaction monitoring</b>	
3.4.1	Does the FI have a system for detecting and fixing suspicious payments or transactions? * If "Yes", please indicate which method is used:  <input type="checkbox"/> Automated <input type="checkbox"/> Manual <input type="checkbox"/> Combined	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4.2	Does FI take actions in order to understand the ordinary transactions of its clients based on their risk evaluation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4.3	Does the FI have procedures for monitoring unusual or suspicious activities?	<input type="checkbox"/> Yes <input type="checkbox"/> No

3.4.4	Does the monitoring program provide requirements for obtaining supporting documents when carry out a transaction for identifying the source of funds/income used by the clients?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4.5	Does FI establish business relationships with high risk customers only after obtain the approval of the senior management or of the administrator?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.4.6	Does the FI have an updated list of politically exposed persons, as well procedures for carrying out increased and permanent monitoring of the transactions with these customers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3.5</b>	<b>Transactions reporting, prevention and detection of suspicious transactions</b>	
3.5.1	Does the FI have a system for detecting and fixing suspicious payments or transactions and those that exceed a certain limit, according to the requirements of the legislation, as well as reporting to the competent bodies?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.2	Does FI dispose the procedure for reporting to the public authorities for the supervision and control of information about suspicious operations in the legalization (laundering) of illegally obtained revenues and / or terrorist financing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.3	Does FI dispose of procedures for identification of structured transactions performed in order to avoid reporting requirements for large amounts of cash?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.4	Does FI evaluate in real time (before processing) transactions of its clients that imply countries of specific interest (off-shore zones etc.) as well as clients' transactions with high risk?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.5.	Does FI dispose of an automat blocking control system of customers / transactions based on the lists of suspects / terrorists / on whom sanctions or prohibitions have been applied both nationally and internationally?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.6	Does FI dispose the procedures by which bank employees are required to verify customer identification data, and to track those transactions that are carried out on behalf of persons involved or suspected in terrorist activities or in the manufacturing / trafficking of drugs, according to the lists of persons and companies suspected of money laundering and/or terrorist financing by government / international agencies? * If "Yes", indicate with which specific lists: <input type="checkbox"/> OFAC <input type="checkbox"/> UN <input type="checkbox"/> EU	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.5.7	In cross-border banking, the financial institution takes one or more of the following measures:	
	Collecting sufficient information about a corresponding institution to fully understand the nature of its work and to ascertain, from publicly available information, its reputation and the quality of supervision?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Evaluate the policies to prevent and combat money laundering and terrorist financing applied by the corresponding institution?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Obtaining approval from senior management before establishing relationships with correspondent banks?	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Has the finding that the correspondent institution has verified the identity of customers whose transactions are carried out through its accounts, applied permanent precautionary measures and is able to provide relevant precautionary data on request?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>3.6</b>	<b>Other additional information</b>	
3.6.1	Does FI open anonymous accounts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.2	Does the FI carry out financial operations through internet banking systems?	<input type="checkbox"/> Yes <input type="checkbox"/> No

3.6.3	Does FI maintain relations with the banks registered in off-shore areas?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.4	Does FI keep correspondent relationships with banks that do not have physical presence in a certain state (Shell Banks)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.5	Does FI have a policy in the FI according to which the correspondent relation will initiated only with banks that are licensed to conduct banking operations in their country of origin.	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.6	Does the FI maintain relations with banks, registered in countries that do not cooperate with the FATF in the fight against money laundering or presents an increased danger in terms of the level of crime and corruption?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.7	Does the IF organize staff trainings in the field of AML/CFT?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.8	Does the IF keep the records of training session that includes information related to the personnel involved and materials used?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.9	Is the staff of the FI informed about any changes in internal regulations and in the relevant legislation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.10	Does the FI participate in seminars organized by the Banks Association or by the public supervisory and control authority in the field of preventing and combating money laundering and terrorism financing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.11	Have there been applied sanctions by supervisors or other authorities in the last 5 years against FI for violating the legislation in the field of preventing and combating money laundering and terrorism financing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.12	Has the FI been the subject of prosecutions, accusations, investigations, which have been linked to money laundering and terrorism financing in the last 5 years?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.13	Should FI be considered as a USA tax resident?	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.6.14	Are the beneficiary owners of FI USA tax residents?	<input type="checkbox"/> Yes <input type="checkbox"/> No

We confirm that the presented information is true and it reflects exactly our bank's policy on preventing and combating of money laundering and terrorism financing.

Date \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
(position) ( first name last name) (signature)

Stamp

**Information about the 3rd parts which will use the services of correspondent banking operations**

Name of the bank (third parts)	The headquarter

Signature