

## AML Questionnaire

The following questions are intended to facilitate our understanding of the Anti-Money Laundering Policies & Procedures your institution has implemented.

(Please circle as appropriate.)

1. Are you subject to local laws and regulations designed to prevent Money Laundering?  
YES
2. Do you maintain mandatory written policies and procedures for the prevention of money laundering?  
YES
3. Do you have arrangements for the independent monitoring and auditing of compliance with the policies and procedures?  
YES
4. Do your policies and procedures meet the requirements of local law and regulations on anti-money laundering and the financing of terrorism?  
YES
5. Where relevant - Are these policies and procedures also mandatory for all your overseas operations?  
YES
6. Do your customer identification procedures meet the current recommendations of the FATF?  
YES
7. Is all relevant staff trained on your own policies and procedures and on the requirements of local law and regulations?  
YES  
If so, how frequently? Annual
8. Do your procedures require the beneficial owners (natural persons) of corporate customers?  
YES
9. Do your procedures require the verification of identification information for all counterparties?  
YES
10. Do your procedures require retention of the relevant KYC records?  
YES  
If yes, for how long? 10 years



11. Do your procedures require the disclosure of suspicious transactions to law enforcement and/or regulatory agencies?  
YES

12. Do you complete customer identification on institutions to which you offer correspondent banking services in accordance with the Wolfsberg Principles for Correspondent Banks, including the provisions relating to "downstream" financial institution customers?  
YES

13. Do your procedures require you to identify the source of your customers' initial funds? And, when necessary, identify other funds that are processed through the account during the term of the relationship?  
YES

14. Do your policies and procedures require you to rate your customers according to the money laundering and terrorist financing that they represent to your institution? If so, how frequently are the ratings updated?  
YES Every day

15. Has your institution implemented an automated system for monitoring, on an ongoing basis, the transactional activity of your customers? Is this system independently audited on a periodic basis?  
YES

16. Do your policies prohibit dealings with Shell Banks? (A Shell Bank is a bank that has no physical presence in its country of incorporation (except if a subsidiary of a regulated bank))  
YES

17. Please state the type of banking or financial services business you undertake.

Deposit Taking	NO
Current account and third party payments	NO
Securities Dealing	NO
Futures and Options Trading	NO
Foreign Currency Dealing	NO
Fund Management	YES
Custody	YES
Derivatives and similar instruments	NO
Lending	NO
Leasing	NO

18. If you offer payable through accounts as part of your correspondent banking services to other institutions, do you satisfy yourselves that your client institution has verified the identity of, and performed ongoing due diligence on, its customers having direct access to accounts with you and is able to provide customer identification data upon your request.  
YES



19. Please describe the nature of your customer base

Retail Customers – Domestic	YES
Retail Customers – International	NO
Corporate Customers – Domestic	YES
Corporate Customers – International	YES
Financial Institutions – Domestic	YES
Financial Institutions – International	YES

20. Do you have customers who are:

High Net Worth Individuals (net worth exceeding USD 10,000,000) served by a dedicated private banking or similar unit	NO
Senior Political Figures	NO
Money transmission services which are not licensed or authorized by a regulatory or governmental body	NO

21. Does your institution directly or through its customers have any business relationships with any countries/entities/individuals that are on the OFAC lists as updated time to time?

NO

22. With Iran? See Appendix A

If yes, does your institution exercise vigilance over transactions involving Iranian banks and the potential connection between Iran's energy industry and the funding of its nuclear effort?

NO

23. Does your institutions impose restrictions on customers engaged in any CISADA sanctionable activities?

YES

24. Has your institution identified any international bank customer that is likely to be engaged in any of the following sanctionable activities?

- Facilitating the efforts of the Government of Iran to acquire or develop Weapons of Mass Destruction or delivery systems for WMD or to provide support for terrorist organizations or acts of international terrorism;
- Facilitating the activities of a person subject to financial sanctions pursuant to the United Nations Security Council Resolutions 1737, 1747, 1803, or 1929, or other Security Council resolution that imposes sanctions with respect to Iran;
- Engaging in money laundering, or facilitating efforts by the Central Bank of Iran or any other financial institution, to carry out either of the facilitating activities described above; or



- Facilitating a significant transaction or transactions providing significant financial services for: (i) the Iran's Islamic Revolutionary Guard Corps or any of its agents or affiliates whose property and interests are blocked pursuant to the International Emergency Economic Powers Act (IEEPA), or (ii) a financial institution whose property and interests in property are blocked pursuant to IEEPA in connection with Iran's proliferation of WMD, Iran's proliferation of delivery systems for WMD, or Iran's support for international terrorism

NO

25. Does your institution comply with FATCA regulations?

YES

*If you have answered NO to any of the questions 1 to 16 or question 18 above please provide supporting explanations.*

Thank you for providing this information. This certification must be signed by the Compliance Officer of your institution.



Print Name: Gutierrez\_Cayon Alfredo

Date: 220/01/18

Signature:

## Appendix A

**Business Relationships in Iran** – refers specifically to relationships with the Iranian government or sanctioned activity under the Comprehensive Iran Sanctions, Accountability and Divestment Act of 2010 (CISADA):

- Investment in Iran's petroleum production
- Expansion of Iran's refined petroleum industry
- Export of refined petroleum products to Iran, or assistance to Iran's ability to import such products
- Provision of goods, services, technology, information or support to Iran's oil and natural gas sector
- Underwriting or providing insurance or reinsurance, financing or brokering, and providing ships or shipping services to deliver refined petroleum products to Iran.

