

Приложение № 5
к Правилам внутреннего контроля по
противодействию легализации доходов, полученных
от преступной деятельности, и финансированию
терроризма в АКБ «Asia Alliance Bank»



Questionnaire

(to be filled by a partner financial institution)

I. General Information

1.1. Full legal name of financial institution (FI)			
1.2. Legal Form (for example Public Limited Company, Joint Stock Company, Partnership, but this is not exhaustive etc.)			
1.3. Legal address			
1.4. Mailing address			
1.5. Registration/License No		1.6. Date of registration	
1.7. Registration body			
1.8. Type of license			
1.9. License number		1.10. Date of issue of the license	
1.11. SWIFT, TELEX			
1.12. FI contacts		1.13. Key contact person	
Telephone		Name:	
Fax		Title	
Website address		Telephone	
e-mail		e-mail	

II. Ownership, management and regulatory information

2.1. If FI is publicly held, please indicate exchange on which shares are traded:
2.2. If Institution is privately owned, please list the names of all owners in the table below and their ownership interest (add further rows if necessary)

3.4. 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 type="checkbox"/>	<input type="checkbox"/>
3.5. Does the FI have a policy prohibiting accounts/relationships with shell banks?	<input type="checkbox"/>	<input type="checkbox"/>
3.6. 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 type="checkbox"/>	<input type="checkbox"/>
3.7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input type="checkbox"/>	<input type="checkbox"/>
3.8. Does the FI have record retention procedures that comply with applicable law?	<input type="checkbox"/>	<input type="checkbox"/>
3.9. 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 type="checkbox"/>	<input type="checkbox"/>
3.10. Has your FI had any regulatory or criminal enforcement actions resulting due to violations of anti-money laundering laws or regulations?	<input type="checkbox"/>	<input type="checkbox"/>
B. Risk Assessment	Yes	No
3.11. Does the FI have a risk-based assessment of its customer base and their transactions?	<input type="checkbox"/>	<input type="checkbox"/>
3.12. 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 type="checkbox"/>	<input type="checkbox"/>
C. Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
3.13. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	<input type="checkbox"/>	<input type="checkbox"/>
3.14. Does the FI have a requirement to collect information regarding its customers' business activities?	<input type="checkbox"/>	<input type="checkbox"/>
3.15. Does the FI assess its FI customers' AML policies or practices?	<input type="checkbox"/>	<input type="checkbox"/>
3.16. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input type="checkbox"/>	<input type="checkbox"/>
3.17. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	<input type="checkbox"/>	<input type="checkbox"/>
3.18. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input type="checkbox"/>	<input type="checkbox"/>
3.19. Does your FI ability to provide essential identification data about the client according to the inquiry of the bank respondent in order to examine operations?	<input type="checkbox"/>	<input type="checkbox"/>
D. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
3.20. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input type="checkbox"/>	<input type="checkbox"/>
3.21. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input type="checkbox"/>	<input type="checkbox"/>
3.22. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input type="checkbox"/>	<input type="checkbox"/>
3.23. 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 type="checkbox"/>	<input type="checkbox"/>
E. Transaction Monitoring	Yes	No
3.24. 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 type="checkbox"/>	<input type="checkbox"/>

F. AML Training	Yes	No
3.25. 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. 	<input type="checkbox"/>	<input type="checkbox"/>
3.26. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input type="checkbox"/>	<input type="checkbox"/>
3.27. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input type="checkbox"/>	<input type="checkbox"/>
3.28. Does the FI employ third parties to carry out some of the functions of the FI?	<input type="checkbox"/>	<input type="checkbox"/>
3.29. 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 different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	<input type="checkbox"/>	<input type="checkbox"/>

Space for additional information:

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

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I confirm that, to the best of my knowledge, the above information is current, accurate and reflective of my institution's anti-money laundering policies.	
Signature:	
Title:	
Date:	

(Seal)

In this questionnaire the following references are used:

- "Beneficial owner" means the natural person(s) who ultimately owns or controls the customer and/or the natural person on whose behalf a transaction or activity is being conducted. The beneficial owner shall at least include:
 - a) in the case of corporate entities:
 - (i) the natural person(s) who ultimately owns or controls a legal entity through direct or indirect ownership or control over a sufficient percentage of the shares or voting rights in that legal entity, including through bearer share holdings, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards; a percentage of 25 % plus one share shall be deemed sufficient to meet this criterion;
 - (ii) the natural person(s) who otherwise exercises control over the management of a legal entity:
 - b) in the case of legal entities, such as foundations, and legal arrangements, such as trusts, which administer and distribute funds:

- (i) where the future beneficiaries have already been determined, the natural person(s) who is the beneficiary of 25 % or more of the property of a legal arrangement or entity;
- (ii) where the individuals that benefit from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;
- (iii) the natural person(s) who exercises control over 25 % or more of the property of a legal arrangement or entity.

■ “Politically exposed person” means natural persons who are or have been entrusted with prominent public functions and immediate family members, or persons known to be close associates, of such persons.

“Shell banks” means a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.