

Correspondent Banking AML /CTF Questionnaire

Section A – General Information

1	Full name of the Financial/Credit Institution		
2	Full address of registered office		
3	Shareholders:		
4	Ultimate Beneficial Owner:		
5	Is the Ultimate Beneficial Owner a politically exposed person (PEP) ?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
6	Directors – Senior Management		
8	GIIN/TIN:		
9	Physical address		
10	Swift/Telex		
11	Website		
12	Date of establishment		
13	Type of activities		
14	Key geographic areas where the financial institution is actively promoting its products		
15	Officer responsible for account relationship		
16	Contact details		
17	External auditor		
18	Does financial institution have branches and/or subsidiaries?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
19	Does this questionnaire apply to your head office as well as all your:		
	- National branches?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	- national subsidiaries?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	- international branches?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	- international subsidiaries?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
20	Banking license number and date of issue Please provide a copy		
21	Commercial registration		
22	Principal local regulator and AML/CTF competent authority (if not the same)		
23	Is financial institution a publicly traded company?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	Provide exchanges and listing symbols		

GARANTI BANK S.A.

Sos. Fabrica de Glucoza nr 5
 Novo Park 3 Business Center
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 Sector 2, București
 Telefon: + (40-21) 208 92 60
 Fax: + (40-21) 208 92 86
 E-mail: contact@garantibbva.ro
www.garantibbva.ro

Trade Registry number J40/4429/2009, CUI
 RO25394008; registered to Bank Registry under no. RB-PJR-40-066/2009
 and in ASF Registry under no. PJR01INCR/400019,
 share capital RON 1.208.086.946

24	Is financial institution an agency, branch or subsidiary of a bank?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
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25. If you answered NO to question 19, please provide in the table below the name, location and contact details of the branches and/or subsidiaries that are represented by this questionnaire:

Name	Location	Contact details

Section B: Respondent Bank Financial Crime Program

1. Please detail the setup of your Compliance Department including the number of staff dedicated to AML, structure and reporting lines.	
2. Do you have a regular internal audit program for Financial Crime? Please detail including your last audit and any key findings.	
3. Has your AML Compliance program ever been assessed by an external auditor? If yes, please provide the date and any key findings.	
4. Please provide the date and outcome of your institution's last AML regulatory examination.	
5. Who approves your AML policy and how frequently is it reviewed?	
6. Do you have a written Anti-Bribery and Corruption Policy (AB&C) or Programme, i.e. written procedures documenting the processes you have in place to prevent, detect and report bribery or corruption? If yes, does your ABC Policy/Programme:	

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a. covers clients and include client monitoring to identifying bribery and corruption transitions?	
7. Do your Financial Crime policies (AB&C, AML and Sanctions) cover all branches and subsidiaries of your financial institution?	

Section C: Geography

1. Where is your client base primarily located?	
2. Does your institution hold accounts for or provide products or services to individuals/entities residing in Syria, Sudan, Iran, Cuba, North Korea or Crimea/Sevastopol regions of Ukraine?	
3. Does your institution operate under an offshore banking license?	

Section D: Business Activities

1. Please detail your principal area of business (e.g. retail, commercial banking, investment banking, central bank, development bank, private banking)	
2. How many Clients bank with your institution?	

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<p>3. Does your institution offer any of the following products/services:</p> <ul style="list-style-type: none"> i) Trade finance ii) Remittance services for non-account holders iii) Bulk currency sales iv) Significant amount of activity of purchase/sale of monetary instruments v) Internet-only banking vi) Numbered/anonymous accounts vii) Sealed bags (pouch) activities <p>Please detail which apply:</p>	
<p>4. If yes to the above, please advise if these are considered high risk products and what additional monitoring/controls may be in place for these products/services.</p>	
<p>5. Do you offer “payable-through accounts” (Payable-through accounts: allows direct use of the correspondent accounts by third parties to transact business on their own behalf)</p>	
<p>6. Does your institution provide correspondent banking services to other financial institutions and will they use the clearing services provided by our institution? (Downstream correspondent banking)</p> <p>If yes, please provide the names and countries of these downstream banks</p>	

Section E: Customer Due Diligence

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1. Does your institution outsource your due diligence programme to any third parties?	
2. Please detail how your institution identifies and verifies both corporate and retail clients (as applicable).	
3. Please detail your process for identifying ultimate beneficial owners.	
4. Does your institution maintain a risk ranking process for your clients? Please note whether this is manual or automated and what parameters are used.	
5. Does your institution identify both domestic and foreign PEPs against new and existing clients? Please outline your identification process.	
6. Please advise whether your institution considers PEPs to be high risk and what enhanced due diligence is conducted.	
7. Does your institution seek to obtain the following: i) Nature of client's business ii) Purpose of account iii) Expected volume & value and type of anticipated business activity If yes, how does it use this information?	
8. Does your institution have any of the following client types:	

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<p>I) Money Service Businesses¹ II) Precious metals (Inc. diamonds) III) Casinos/online gambling IV) Arms/armament production/atomic power V) Charities VI) Virtual currency operators VII) Shell banks VIII) Shipping industry IX) PEPs</p> <p>If yes, please advise the number/ percentage of clients your institution maintains accounts for and what enhanced due diligence is undertaken for each client type</p>	
<p>9. Are there any other client types that you consider high risk and undertake enhanced due diligence on? Please detail</p>	
<p>10. Please list any particular sectors and/or countries that you have defined restrictions in place for. E.g. military/defence, nuclear etc.</p>	
<p>11. Please advise your KYC renewal process, including the frequency and whether all KYC files are up to date</p>	
<p>12. What is your institutions process for identifying and dealing with negative news on one of your clients?</p>	

¹ Money Service Businesses are businesses that exchange currency, transmit money or cash cheques for their customers

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Section F: Transaction Monitoring

1. Does your institution monitor the account activity of its customers to detect unusual or suspicious activity?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
2. If yes, please can you advise the following: i) Manual or automated (or both) ii) Vendor solution or in-house (please detail the vendor if applicable)		
3. Please can you advise what parameters are used (e.g. thresholds, behavioural scenarios, Specialised scenarios for higher risk client types e.g. PEPs).		
4. How many alerts do you receive on average per month and who deals with the review of these alerts?		
5. How many SARs have you filed in the past 12 months?		
6. Does your institution have procedures in place to exit clients if deemed necessary?		

Section G: Sanction Screening

1. Does your institution undertake sanctions screening against official lists? Please detail whether you have a manual or automated screening process and what lists you screen against.		
2. Do you screen both incoming & outgoing payments in real-time?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
3. Do you maintain internal policies, controls and procedures to ensure that	YES <input type="checkbox"/>	NO <input type="checkbox"/>

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you comply with international financial sanctions (i.e UN, EU, OFAC...)?		
4. Are you involved in transactions, investments or activities with Cuba, North Korea, Iran, Sudan, Syria and the territory of Crimea?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
5. Do you provide correspondent Banking services to Banks or other financial institutions domiciled in Cuba, North Korea, Iran, Sudan, Syria and the territory of Crimea ?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
6. Do you screen your clients at on-boarding and also re-screen your existing clients frequently to capture list updates?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
7. Who reviews the sanction alerts and what is the escalation process?		
8. If answered Yes to 4 or 5 please, confirm the following statement: <input type="checkbox"/> we will not execute any transaction related to sanctioned countries through Garanti Bank Romania SA (directly or indirectly).		

Section GH: AML Training

1. Please can you advise whether you have an AML and AB&C training program in place for all employees? Please provide details including whether any targeted training is in place.	
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I certify that the statements provided are completed and accurate and I am authorised to execute this questionnaire on behalf of (Name of your institution)

Name:

Title:

Date:

Email:

Tel:

Signature:

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