

DUE DILLIGENCE QUESTIONNAIRE

Anti-Money Laundering & Anti-Terrorist Financing

This questionnaire is designed to provide Commercial Bank INTESA SANPAOLO ROMANIA SA with information about you, and your policies and procedures.

The Wolfsberg questionnaire provides the basis for the majority of the sections included in this document, so you may wish to use this as a guide to completing this. Please provide the additional information and details where requested.

Full Name of the Bank				
Country of incorporation:				
Registered address:				
AML Officer/Compliance Officer Contact Details (name, title, address, phone, e-mail):				
Date:				
			Yes	No
Does your country adhere to the 40 anti-money laundering recommendations and nine special terrorist financing recommendations developed by the Financial Action Task Force (FATF)?				
Can you confirm that your Bank is in compliance with the all FATF recommendations mentioned above?				
If "NO" please provide details:				
Purpose	1	What is the purpose of the business relationship with INTESA SANPAOLO ROMANIA: ...		
Nature of business	2	List nature of business of your bank (e.g. retail banking, wholesale banking etc.): ...		
			Yes	No
	3	Does your institution currently operate as an offshore financial entity ¹ ? <i>If the answer is "yes", please confirm the following:</i> a) <i>The type of activity that you are permitted to undertake (including any documentation which supports this):</i> ... b) <i>The number and type of clients that you currently maintain on your books:</i> ... c) <i>The locations of the clients currently on your books:</i> ... ¹ <i>An offshore financial entity is defined as a bank that is located outside the country of residence of its depositors, typically in a low tax jurisdiction, and whose primary or sole offering is/are financial services to non-resident depositors.</i>		
			Yes	No
Ownership / Management	4	Is your bank a private company?		

team	5	Is your bank a Government – Owned Company?		
	6	Is your bank listed on any stock exchange? If “YES” please provide details: ...		
	7	List names and titles of your bank’s Senior Management Team (Board of Directors, Audit Committee, CEO): ...		
	8	Please indicate the names of all shareholders who, <u>directly or indirectly</u> , own, control or have voting rights power exceeding 10%: <u>Surname and Name/Entity Name</u> <u>% of Ownership</u> <u>Nationality/Country of Incorporation</u> <u>Date of Birth/Date of Incorporation</u> ...		
			Yes	No
Supervisory Authority	9	Do any of your controlling owners or senior management team currently hold, or have held, important public positions (often referred to as “politically exposed persons”)? <i>If “yes”, describe:</i> ...		
	10	Please specify the name of the Supervisory Authority : ...		
	11	Please specify the name of your Financial Intelligence Unit (FIU): ...		
			Yes	No
Payable-through accounts	12	Does your regulatory Supervisory Authority undertake monitoring visits on a regular basis, to assess your money laundering and terrorist financing policies and procedures? <i>Please specify when was the last inspection</i> ...		
			Yes	No
	13	Does your institution allow payable through accounts or the direct use of your correspondent account by your customers to transact business? <i>If “YES”, describe:</i> ...		
	14	If “YES”, does your institution have policies and procedures that require you to verify the identity of and perform on-going due diligence on such customers and their use of such accounts?		
	15	Regarding the above, are you able to provide relevant customer identification data upon request?		
	16	What is your bank’s “know your customer” policy with respect to such correspondents or third parties? <i>Please describe:</i> ...		
			Yes	No

Laws	17	<p>Has your country established laws designed to prevent money laundering and terrorist financing?</p> <p><i>If "YES" please list the name of the most relevant laws in your country related to the question above: ...</i></p>		
AML policies, practices, and procedures			Yes	No
	18	<p>Does the bank have an AML compliance program approved at board or a senior committee level?</p> <p>- <i>Please describe what is the nature and frequency of AML reporting to board / senior management? ...</i></p>		
	19	<p>Does your bank have AML/KYC/CTF policies and practices that apply to all branches and subsidiaries, both in the bank's home country and in other jurisdictions?</p> <p>- <i>How do you communicate and enforce the policy and practices across your network of domestic and foreign offices? ...</i></p>		
	20	<p>Does the bank have a compliance program that includes a designated officer that is responsible for coordinating and overseeing AML/CTF?</p> <p>- <i>Have a formal / independent Anti-Money Laundering Compliance function? Describe the structure of the AML function, including the approximate number of dedicated resources. ...</i></p> <p>- <i>Who is ultimately responsible for AML/CTF, monitoring and reporting within your organisation? (job title and reporting line) ...</i></p>		
	21	<p>Does the bank have documented policies outlining the processes that have been implemented to identify, prevent, detect and report suspicious transactions to the appropriate authorities?</p> <p>- <i>How often does you review the policies and procedures?</i></p>		
	22	<p>Does the bank have an internal audit function or other independent third party, other than government supervisors/regulators, that assesses AML/CTF policies and practices on a regular basis?</p> <p>- <i>What is the frequency of review? ...</i></p> <p>- <i>When did the most recent Audit examination take place? ...</i></p>		
23	<p>Does the bank have Policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?</p> <p><i>Please provide details about the following:</i></p> <p>- <i>What is the local definition of a PEP? ...</i></p> <p>- <i>How are PEPs identified? Which database is used for PEP screening? ...</i></p> <p>- <i>What enhanced due diligence / monitoring is conducted for PEPs? ...</i></p>			

		<ul style="list-style-type: none"> - Are local PEPs treated the same as foreign PEPs? ... - Is there a time limit for when a PEP ceases to be classified as a PEP? ... - Is screening conducted at client on boarding to identify PEPs and related individuals? Is there automated, on-going screening of customers and connected parties? ... 		
	24	<p>Do your policies and procedures require you to keep customer identification account files, business correspondence and records for a specific period of time?</p> <ul style="list-style-type: none"> - If yes, for how long? ... 		
Banking license	25	<p>Please specify your institution's registration/license number:</p> <p>License No: ... issued by ... on ...</p>		
Compliance			Yes	No
	26	Are you in substantial compliance with your national anti-money laundering and terrorist financing regulations and sanction measures regulations and the regulatory requirements in all jurisdictions in which you operate?		
Penalties			Yes	No
	27	Are there any civil or criminal penalties that have been imposed on your institution in respect of AML or ATF requirements?		
Training			Yes	No
	28	<p>Does your institution have an established employee-training program to teach employees about money laundering and terrorist financing and to assist them in identifying suspicious activities?</p> <p>Please provide details about the following:</p> <ul style="list-style-type: none"> - Who are the target group of employees for training? ... - Does the bank provide tailored based AML/CTF training? ... - What is the frequency of training delivered? ... - Is the training delivered to all Branches and Subsidiaries domestically and in other jurisdictions? ... 		
	29	Does your institution retain records of its training sessions including attendance records and relevant training materials used?		
	30	Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
Know Your Customer, Due Dilligence and Enhanced Due Dilligence			Yes	No
	31	<p>Does your institution have a written policy to ensure that reasonable measures are taken to obtain information about the identity of customers and beneficial owners including ensuring that your institution does not transact business with sanctioned individuals, entities or countries with which transacting is prohibited by appropriate government agencies, law enforcement or regulators?</p> <p>Please provide details about the following:</p> <ul style="list-style-type: none"> - Who is responsible for KYC during on-boarding and review? ... - Is the KYC process centralized or do branches conduct their own KYC? If branches conduct their own KYC, is there centralized review and/or approval? ... 		

		- <i>Is a consistent KYC approach employed throughout the bank? ...</i>		
32	Does your institution, or any of your subsidiaries, have assets, interests or operations in Iran, the Democratic People’s Republic of Korea (North Korea), Syria, Sudan or Cuba? <i>If “yes”, please describe: ...</i>			
33	Does your institution have a requirement to collect information regarding its customers’ business activities? <i>Please provide details about the following:</i> <ul style="list-style-type: none"> - <i>Is KYC due diligence conducted for all clients? ...</i> - <i>Is there a sign-off / approval process for customer KYC? Does the approval process differ for KYC reviews / updates? ...</i> 			
34	Does your institution assess its bank customers’ AML/CTF policies or practices? <i>Please provide details about the following:</i> <ul style="list-style-type: none"> - <i>How is this done (standard Wolfsberg / tailored questionnaire)? ...</i> - <i>Does the bank assess the money laundering risks associated with its correspondent bank customers on the basis of the countries and types of banks served? How are these risks assessed? ...</i> - <i>Does the bank have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin? ...</i> 			
35	Does your institution have a process to review and, where appropriate, update customer information /documents and perform a new due diligence process for that customers? <ul style="list-style-type: none"> - <i>What is the frequency of review for High Risk clients? ...</i> 			
36	Does your institution have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information? <i>Please provide details about the following:</i> <ul style="list-style-type: none"> - <i>What is the minimum documentation/information standard for new customers? ...</i> - <i>Does the bank review source of funds when conducting due diligence on new customers? ...</i> 			
37	Does your institution apply customer due diligence measures when ... 37.a. ... establishing a business relationship? 37.b. ... carrying out occasional transactions of significant amount?			
38	Does your institutions apply enhanced due diligence for the following situations: <ul style="list-style-type: none"> - <i>Business relationships with “politically exposed persons” residing in a third country?</i> - <i>Situations which by their nature can present a higher risk of money laundering or terrorist financing?</i> - <i>When the customer has been not physically present for identification purposes?</i> - <i>In respect of cross-frontier correspondent banking relationships and other similar relationships with respondent institutions from third countries?</i> 			

		<i>Please describe the Enhanced due diligence process in your bank ...</i>		Yes	No
Reporting of suspicious activities/Transaction monitoring	39	Is there an established method at your institution for identifying and reporting suspicious activities or transactions to the appropriate authorities? - <i>Please specify if your institution is using automatic programs for identifying suspicious transactions. ...</i> - <i>Please describe briefly the process for identifying and reporting of suspicious activities/transactions. ...</i>			
	40	Does your institution have in place procedures in order to identify transactions structured to avoid reporting obligations, where cash transaction reporting is mandatory? - <i>What are the local thresholds for cash reporting? ...</i>			
	41	Does your bank have a monitoring system / screening for customers and transactions (incoming and outgoing) against lists of sanctioned persons, entities or countries issued by government/competent authorities? <i>Please describe briefly the process and what lists are used for screening against. ...</i>			
Shell Banks and other	42	Does your institution maintain accounts for banks that do not have a physical presence in any country (i.e. shell banks)?			
	43	Does your institution have policies to reasonably ensure that it will not conduct transactions with or on behalf of shell banks through any of its accounts or products?			
	44	Does your institution have policies to reasonably ensure that any correspondent banks to which it provides services possess licenses to operate in their countries of origin?			
	45	Does your institution have a policy that prohibits opening or maintaining anonymous accounts?			
	46	Do you maintain a place of business that is located at a fixed address in each country in which you are authorized to conduct banking activities?			
Third parties and agents	47	Does your institution employ third parties or agents to carry out any functions in respect of which AML or ATF obligations apply?			
	48	If yes, does your institution provide appropriate AML or ATF training to and oversight of such third parties or agents?			
<p>I confirm that, to the best of my knowledge, the above information is correct, accurate and reflective of my company's money laundering, combating terrorist financing and know your customer policies, procedures and programs.</p>					
Completed by:	Full Name: Title: Address: Date Completed:				