

FOREIGN FINANCIAL INSTITUTION DUE DILIGENCE QUESTIONNAIRE

Name of Account	Account Number: <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> - <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/> <input style="width: 15px; height: 15px;" type="text"/>

FFI Policies and Procedures Risk Assessment

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| Yes | No | Does the "FFI" have a written and current AML program? |
| Yes | No | Has the "FFI" developed written policies and procedures in place to prevent, detect & report suspicious activity which are approved by senior management? |
| Yes | No | Does the "FFI" have a designated Compliance Officer that is responsible for coordinating and overseeing the AML program? |
| Yes | No | Does the "FFI" have a risk focused assessment of its customer base and transactions of its customers? |
| Yes | No | Does the "FFI" have a policy prohibiting accounts relationships with shell banks (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.) |
| Yes | No | Does the "FFI" have policies or practices to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? |
| Yes | No | Does the "FFI" have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? |
| Yes | No | Does the "FFI" require that its AML policies and practices be applied to all branches and subsidiaries of the "FFI" both in the home country and in locations outside of the home country? |

FFI Customer Identification Risk Assessment

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| Yes | No | Has the "FFI" implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. |
| Yes | No | Does the "FFI" accept accounts from jurisdictions with AML sanctions in force? |
| Yes | No | Does the "FFI" have policies covering relationships with politically exposed persons consistent with industry best practices? |
| Yes | No | Does the "FFI" have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening? |
| Yes | No | Does the "FFI" take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers? |
| Yes | No | Does the "FFI" collect information and assess its customers' AML policies/practices? |
| Yes | No | Does the "FFI" have a requirement to collect information regarding its customers' business activities? |

