

FIRST COMMERCIAL BANK

KNOW YOUR CUSTOMER /

ANTI-MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM

QUESTIONNAIRE

Section I – General Administrative Information	
Legal Name of Institution	
Legal Form	
SWIFT Address / Website	
Principal Place of Business (Address)	
Registered at / Banking License issuing authority 、 date and number	
Does your Institution maintain a physical presence ¹ in the licensing country? YES NO	
Is your institution an agency, branch or subsidiary of a bank with a physical presence ? YES NO If yes, please answer the following questions :	
<ul style="list-style-type: none">• Name of affiliate / parent company:• Is affiliate / parent company publicly traded? YES NO If yes, list exchanges and symbols:• Indicate affiliation: agency branch subsidiary• Licensing country of affiliate:	
Is your institution a publicly traded entity ² ? YES NO <ul style="list-style-type: none">• If yes, please list the exchanges & symbols:	
Officer Responsible for Account / Relationship :	Secondary Contact :
Telephone No. :	Telephone No. :
Fax No. :	Fax No. :
E-mail Address :	E-mail Address :

¹ Physical presence means your institution maintains a physical place of business, other than an electronic address, in a country where it is authorized to conduct banking activities, at which it employs at least one employee on a full-time basis and maintains records of its banking activities, and is subject to supervision by the regulators of the country authorizing the institution's license.

² If your institution is an agency, branch or subsidiary of a publicly traded entity that is listed on one of the exchanges listed in Appendix B, the answer to the question should be "Yes."

Section II – Scope of Business Activities		
Please list the principal countries in which your institution maintains branches, agencies and subsidiaries. Additionally, please indicate the type of operation and the number of offices or locations. (Please attach additional pages if necessary.)		
Country	Type (Branch, Agency, Subsidiary, etc.)	Number
Please list the principal areas of business in which your institution participates in terms of contribution to revenue.		
Principal areas of business activity (Commercial, Private, Corporate, Wholesale, Insurance, etc.)		Approximate percent of revenue

Section III– Ownership and Management Information (Only for use when the subject institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B)		
If your institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B, please list the names of the owners of your institution and their ownership interest. (For purposes of this questionnaire, an “owner” is any person or juridical entity that, directly or indirectly, owns, controls or has voting power of twenty percent (20%) or more of any class of securities of your institution.)		
Name of Institution	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)

If any of the foregoing owners is a juridical entity, please list the names of the shareholders of the legal entity, and their ownership interest in the legal entity ³ . (Please attach additional sheets if necessary).			
Name of Entity	Shareholders	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)

3 If the second tier shareholders are also juridical entities, the third tier shareholder's names, ownership interests, and nature of ownership shall also be listed. This exercise should continue through the required number of iterations until the true beneficial owners are identified. Note: If any legal entity is publicly held, please indicate only that it is publicly held and the exchange on which shares are traded.

Please list the names of the principal officers and directors of your bank, their respective positions, and the number of years they have been employed by the bank. (Please attach additional sheets if necessary).		
Name	Position	Years of Service

Are there any Politically Exposed Persons ⁴ among your Institution's ownership structure and executive management? YES NO
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4 Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public functions, for example Head of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials, or their family members or close associates. The definition is not intended to cover middle ranking of more junior individuals in the foregoing categories (cf. FATF Forty Recommendations).

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Signature :

Completed by :

Position :

Date :

Name of Institution :

Address of

E-mail :

**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &
COUNTERING THE FINANCING OF TERRORISM CONTROLS**

	Yes	No
1.Does the AML CFT, and KYC compliance program require approval of your institution's Board or a senior committee thereof?	Yes	No
2.Does your Institution have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	Yes	No
3.Has your Institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Yes	No
4.In addition to inspections by the government supervisors / regulators, does your institution's client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes	No
5.Does your Institution 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
6.Does your Institution have policies covering relationships with politically exposed persons consistent with industry best practices?	Yes	No
7.Does your Institution have appropriate record retention procedures pursuant to applicable law?	Yes	No
8.Does your Institution require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	Yes	No
9.Does your Institution have a risk focused assessment of its customer base and transactions of its customers?	Yes	No
10.Does your Institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your Institution has reason to believe pose a heightened risk of illicit activities at or through the FI?	Yes	No
11.Has your Institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country / state that issued it)?	Yes	No
12.Does your Institution have a requirement to collect information regarding its customers' business activities?	Yes	No
13.Does your Institution collect information and assess its FI customers' AML policies or practices?	Yes	No

14.Does your Institution 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
15.Does your Institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Yes	No
16.Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes	No
17.Does your Institution have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes	No
18.Does your Institution screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Yes	No
19.Does your Institution 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? (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
20.Does your Institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes	No
21.Does your Institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	Yes	No
22.Does your Institution provide AML training to relevant employees that includes 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 and internal policies to prevent money laundering?	Yes	No
23.Does your Institution retain records of its training sessions including attendance records and relevant training materials used?	Yes	No
24.Does your Institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes	No
25.Does your Institution employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes 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 and internal policies to prevent money laundering?	Yes	No
※ For all above, please provide comments on any 「No <input checked="" type="checkbox"/>」 responses :		

26.Does your Institution provide payable through accounts ? (if Yes, please comment)	Yes	No
27.Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the last five years ? (if Yes, please comment)	Yes	No

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Signature :

Completed by :

Position :

Date :

Name of Institution :

Address of

institution :

E-mail :

<p>KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM – APPENDIX A</p>

This is the list of the institution's agencies, branches, and subsidiaries to which the certification of adherence in the representation letter applies :

**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &
COUNTERING THE FINANCING OF TERRORISM – APPENDIX B**

Stock Exchanges

- Alberta Stock Exchange
- American Stock Exchange
- Athens Stock Exchange
- Australian Stock Exchange
- Bermuda Stock Exchange
- Bolsa de Comercio de Buenos Aires
- Bolsa de Comercio de Santiago
- Bolsa de Valores de Caracas
- Bolsa de Valores de Lima
- Bolsa de Valores de Rio de Janeiro
- Bolsa de Valores de São Paulo
- Bolsa Mexicana de Valores
- Bolsas y Mercados Españoles
- Boston Stock Exchange
- Bourse de Luxembourg
- Bourse de Montreal
- BSE The Stock Exchange, Mumbai
- Bucharest Stock Exchange
- Budapest Stock Exchange Ltd.
- Chicago Board Options Exchange
- Chicago Stock Exchange
- Colombo Stock Exchange
- Copenhagen Stock Exchange
- Cyprus Stock Exchange
- Deutsche Börse Ag
- Euronext Amsterdam
- Euronext Belgium
- Euronext Brussels
- Euronext Lisbon
- Euronext Paris
- HEX Plc
- Hongkong Exchanges and Clearing
- Irish Stock Exchange
- Istanbul Stock Exchange
- Italian Exchange
- Jakarta Stock Exchange
- Jamaica Stock Exchange
- JSE Securities Exchange, South Africa
- Korea Stock Exchange
- Kuala Lumpur Stock Exchange
- Ljubljana Stock Exchange
- London Stock Exchange
- Malta Stock Exchange
- NASD
- National Stock Exchange of India, Ltd.
- National Stock Exchange of Lithuania
- New York Stock Exchange
- New Zealand Stock Exchange
- Osaka Securities Exchange
- Oslo Bors
- Philippine Stock Exchange
- Prague Stock Exchange
- Shanghai Stock Exchange
- Shenzhen Stock Exchange
- Singapore Exchange
- Stock Exchange of Hongkong
- Stock Exchange of Tehran
- Stock Exchange of Thailand
- Stockholmsbörsen
- SWX Swiss Exchange
- Taiwan Stock Exchange Corp.
- Tel Aviv Stock Exchange
- Tokyo Stock Exchange
- TSX Toronto Stock Exchange
- Vancouver Stock Exchange
- Warsaw Stock Exchange
- Weiner Börse Ag
- Winnipeg Stock Exchange