Anti-Money Laundering Questionnaire

This document is based on the Wolfsberg Group Financial Crime Compliance Questionnaire (FCCQ) v1.1 of April 2020.

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS, with the aim of developing standards for the financial services industry and related products for the "Know Your Customer", "Money Laundering" and "Terrorist Financing" guidelines. Website www.wolfsberg-principles.com/

Company Name	
registered office of the company (country)	

1. Organization & Ownership Structure			
1	Full legal name		
2	Append a list of branches which are covered by this questionnaire		
3	Full Legal (Registered) Address		
4	Full Primary Business Address (if different from above)		
5	Date of Entity incorporation / establishment		
6	Select type of ownership and append an ownership chart if available		
6 a	Publicly traded (25% of the shares publicly traded)	Y ○	N ○

6 a1	If Y, indicate the exchange traded on and ticker symbol		
6 b	Member Owned / Mutual	Y ◯	N ◯
6 c	Government or State Owned by 25% or more	Y ◯	N ◯
6 d	Privately Owned	Y ◯	N ◯
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more		
7	% of the Entity's total shares composed of bearer shares		
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Y ◯	N ◯
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL		

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2. AGW, CTF & Sanction Programs			
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:		
9 a	Appointed Officer with sufficient experience /expertise	Y ○	N ○
9 b	Cash Reporting	Y ○	N ○
9 c	CDD	Y ○	N ○
9 d	EDD	Y ○	N ○
9 e	Beneficial Ownership	Y ○	N ○
9 f	Independent Testing	Y ○	N ○
9 g	Periodic Review	Y ○	N ○
9 h	Policies and Procedures	Y ○	N ○
9 i	Risk Assessment	Y ○	N ○
9 j	PEP Screening	Y ○	N ○
9 k	Sanctions	Y ○	N ○
9 l	Adverse Information Screening	Y ○	N ○
9 m	Suspicious Activity Reporting/ tax avoidance	Y ○	N ○
9 n	Training and Education	Y ○	N ○
9 o	Transaction Monitoring	Y ○	N ○
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Y ○	N ○
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Y ○	N ○
11 a	If Y, provide further details:		

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3. Anti Bribery & Corruption			
12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Y ◯	N ◯
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Y ◯	N ◯
14	Does the Entity provide mandatory ABC training to:		
14 a	Board and Senior Committee Management	Y ◯	N ◯
14 b	First Line of Defence	Y ◯	N ◯
14 c	Second Line of Defence	Y ◯	N ◯
14 d	Third Line of Defence	Y ◯	N ◯
14 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Y ◯	N ◯
14 f	Non-employed workers as appropriate (contractors / consultants)	Y ◯	N ◯
4. Procedures & Guidelines			
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
15 a	Money laundering	Y ◯	N ◯
15 b	Terrorist financing	Y ◯	N ◯
15 c	Sanction violations	Y ◯	N ◯
16	Does the Entity have procedures & policies that:		
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Y ◯	N ◯

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16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Y ○	N ○
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Y ○	N ○
16 d	Prohibit accounts / relationships with shell banks	Y ○	N ○
16 e	Prohibit dealing with another Entity that provides services to shell banks	Y ○	N ○
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Y ○	N ○
16 g	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Y ○	N ○
16 h	Assess the risks of relationships with PEPs, including their family and close associates	Y ○	N ○
16 i	Define escalation processes for financial crime risk issues	Y ○	N ○
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Y ○	N ○
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Y ○	N ○
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Y ○	N ○
18	Does the Entity have a record retention procedures that comply with applicable laws?	Y ○	N ○
18 a	If Y, what is the retention period?	Less than 5 years ○	5 years or more ○

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5. KYC, CDD & EDD			
19	Does the Entity verify the identity of its customers?	Y ○	N ○
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Y ○	N ○
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
21 a	Ownership structure	Y ○	N ○
21 b	Customer identification	Y ○	N ○
21 c	Expected activity	Y ○	N ○
21 d	Nature of business / employment	Y ○	N ○
21 e	Product usage	Y ○	N ○
21 f	Purpose and nature of the business relationship	Y ○	N ○
21 g	Source of funds (invested funds)	Y ○	N ○
21 h	Source of wealth	Y ○	N ○
22	Are each of the following identified:		
22 a	Ultimate beneficial owner	Y ○	N ○
22 a1	Are ultimate beneficial owners verified?	Y ○	N ○
22 b	Authorised signatories (where applicable)	Y ○	N ○
22 c	Key controllers	Y ○	N ○
22 d	Other relevant parties		
23	Does the due diligence process result in customers receiving a risk classification?	Y ○	N ○
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Y ○	N ○

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25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Y ○	N ○
26	Does the Entity have a process to review and update customer information based on:		
26 a	KYC renewal	Y ○	N ○
26 b	Trigger event	Y ○	N ○
27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?		
27 a	Non-account customers	Y ○	N ○
27 b	Offshore customers	Y ○	N ○
27 c	Shell banks	Y ○	N ○
27 d	Money & Capital Transfer/Money Service Clients (MVTS/MSB)	Y ○	N ○
27 e	PEPs	Y ○	N ○
27 f	PEP Related	Y ○	N ○
27 g	PEP Close Associate	Y ○	N ○
27 h	Correspondent Banks	Y ○	N ○
27 h1	If enhanced due diligence or enhanced due diligence & resticted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Y ○	N ○
27 i	Arms, defense, military	Y ○	N ○
27 j	Nuclear power	Y ○	N ○
27 k	Extractive industries	Y ○	N ○
27 l	Precious metals and stones	Y ○	N ○
27 m	Unregulated charities	Y ○	N ○
27 n	Regulated charities	Y ○	N ○

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27 o	Red light business / Adult entertainment	Y ○	N ○
27 p	Non-Government Organisations	Y ○	N ○
27 q	Virtual currencies	Y ○	N ○
27 r	Marijuana	Y ○	N ○
27 s	Embassies / Consulates	Y ○	N ○
27 t	Gambling	Y ○	N ○
27 u	Payment Service Provider	Y ○	N ○
27 v	Other (please specify)		
28	If restricted, provide details of the restriction		
6. Monitoring & Reporting			
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Y ○	N ○
30	What is the method used by the Entity to monitor transactions for suspicious activities?		
30 a	Automated	Y ○	N ○
30 b	Manual	Y ○	N ○
30 c	Combination of automated and manual	Y ○	N ○
31	Does the Entity have regulatory requirements to report suspicious transactions?	Y ○	N ○
31 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Y ○	N ○
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Y ○	N ○

7. Payment transparency			
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Y ○	N ○
34	"Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:		
34 a	FATF Recommendation 16	Y ○	N ○
34 b	Local Regulations	Y ○	N ○
34 b1	Specify the regulation		
34 c	If N, explain		
8. Sanctions			
35	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	Y ○	N ○
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Y ○	N ○
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Y ○	N ○
37 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Y ○	N ○
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Y ○	N ○

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37 d	European Union Consolidated List (EU)	Y ◯	N ◯
37 e	Other (specify)		
38	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	Y ◯	N ◯
9. Trainings & Continuing Education			
39	The Company offers mandatory training that includes the following:		
39 a	Identification and reporting of transactions to government authorities	Y ◯	N ◯
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Y ◯	N ◯
39 c	"Internal policies for controlling money laundering, terrorist financing and sanctions violations"	Y ◯	N ◯
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Y ◯	N ◯
40	Is the above mandatory training provided to :		
40 a	Board and Senior Committee Management	Y ◯	N ◯
40 b	1st Line of Defence	Y ◯	N ◯
40 c	2nd Line of Defence	Y ◯	N ◯
40 d	3rd Line of Defence	Y ◯	N ◯
40 e	"3rd parties to which specific FCC activities have been outsourced"	Y ◯	N ◯
40 f	Non-employed workers (contractors / consultants)	Y ◯	N ◯

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10. Audit			
41	"In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?"	Y ○	N ○
11. Services/Distributors			
42	Please list the countries in which you offer your services:		
43	Do you have sub-distributors?	Y ○	N ○
44	Please list the countries in which your sub- distributors offer their services:		
45	Are your sub-distributors in the country in which they are registered, also regulated by the Financial Markets Supervisory Authority there?	Y ○	N ○
46	Do you check the anti-money laundering and anti-terrorism financing standards of your sub- distributors? (via AML-CTF Questionnaire or similar)	Y ○	N ○
47	Have there been any changes in your ultimate beneficial owner or fictitious beneficial owners since the last query? If yes, please fill in as follows: New owners please all details, departed owners please only first name, last name.	Y ○	N ○

	First name, last name:	Nationality:	Date/place of birth	Address:
1)				
2)				
3)				
4)				

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Anti-Money Laundering Questionnaire

Additional information:

(Please specify the question to which the relevant information relates)

We hereby confirm that we will inform you immediately of any changes in ultimate or fictitious beneficial ownership. Furthermore, we will inform you in case of changes regarding trading for own and/or third party account.

Please designate a central contact person for future requests:

Surname, First name:
Position:
Email*:
Phone number:

As part of the simplification of the AML/KYC process which is required by regulation we would like to avoid an inefficient process within your company. That is why we ask for a specific contact person. In addition, the process is to be made simpler and more efficient by digitalization, which is why an e-mail address is also mandatory.
The collected information will be processed and used exclusively in connection with the fulfillment of the regulatory purposes in the AML/KYC process.
By signing this money laundering questionnaire, the signatory assures that he/she has obtained the consent of the person/persons indicated as central contact persons in this questionnaire and that the personal data provided here may be processed for this purpose.
*You are also welcome to register a group mailbox.

Signatory Information:

Surname, First name:
Position:
Signature:
Date:

Evaluate and print