

Name of Financial Institution :

**QUESTIONNAIRE ON
KNOW-YOUR CUSTOMER AND ANTI MONEY LAUNDERING**

Information submitted to: Bank of India

I	General Information	
a.	Name of your organization:	
b.	Bank License No.& Date:	
c.	License issuing authority:	
d.	Address:	
e.	Registered Office at:	
f.	Head Office at:	
g.	Principal Operating Office at:	
h.	E-mail:	
i.	Website:	
j.	Name of Anti-Money-Laundering Officer with Tel., Fax, E-mail:	
k.	Name of the supervisory organization in your Country:	
l.	If FI is publicly traded, names of exchanges:	

		Yes	No
II.	General AML policies, Practices and Procedures:		
1.	Has the country in which you are located established laws designed to prevent money laundering? If Yes, is your institution subject to such laws?		
2	Does your institution maintain a physical presence in the licensing country? Physical presence means a place of business located at affixed address (other than solely an electronic address, a post office address or an accommodation address) AND in a country in which bank is authorized to conduct banking activities and where the bank employs 1 or more individuals full time and maintains operating records related to banking activities and where the bank is subject to inspection by the banking authority which licensed the bank to conduct banking activities.		
3	Does the FI have a legal and regulatory compliance program that includes a designated Compliance Officer who 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?		
4	Does the law require banks to have procedures for the prevention of money laundering?		
5	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/ Board of FIs.?		
6	In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
7	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)		
8	Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices?		
9	Does the FI have appropriate record retention procedures pursuant to applicable law?		
10	Does your institution require that its AML policies and practices be applied to all branches and subsidiaries of the financial institution in the home country and in locations outside of home country?		
11	Does your country adhere to the 40 anti-money laundering recommendations and 9 special terrorist financing recommendations developed by the Financial Action Task Force (FATF)? If your country is not a member of the FATF, please provide the name of the comparable organisation to which your country belongs, e.g. the name of the FATF-style regional body to which your country belongs? (APG-Asia Pacific Group on Money Laundering, MONEYVAL, etc.)		

12	Do the laws and regulations in your country prohibit your institution from opening an anonymous account?		
13	Has your Institution had any regulatory or criminal enforcement action resulting from violation of AML laws or regulations		
III	Risk Management		
1	Does the FI have a risk focussed assessment of its customer base and transactions of its customers?		
2	Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the institution has reason to believe pose a heightened risk of illicit activities at or through the institution?		
3.	Whether proper system is put in place to track transactions on the basis of risk classification of countries and you do not entertain transactions with High Risk categorised countries?		
IV	Know Your Customer, Due Diligence and Enhanced Due Diligence		
1	Has your institution implemented systems for identification of its clients, including client information in case of recorded transactions, account opening such as family name/ name of the firm, activities/ job, nationality, street address, tel. Number, country/ state that issued it?		
2	Does your institution have procedures to establish a record for each client noting their respective identification documents and know your client information collected at account opening? Are copies of identification documents retained in your possession for reference? If so, how long are the records retained?		
3	Does the FI collect information and access its FI customers' AML policies or practices?		
4	Does your institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?		
V	Reportable transactions and prevention and detection of transactions with illegally obtained funds		
.1	Does your institution have policies for the identification and reporting of transactions that are required to be reported to the authorities?		
2	Does your institution screen transactions for clients or transactions the financial institutions deems to be of significantly high risk that special attention to such customer or transactions is necessary prior to completing any such transactions?		
3	Does your institution have procedures to identify transaction structured to avoid large cash reporting requirements?		
4	Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licences to work in their countries of origin?		
5	Is your institution subject to regulatory requirements on reporting of suspicious activities? Which authority is in charge of receiving suspicious activities report?		

VI	Transaction Monitoring		
1	Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers' cheques, money orders, etc)?		
2	Is your institution subject to Regulatory laws for retention of records of Suspicious Transaction Reports? If so for how long?		
3	Within last one year has your institution reported to the regulatory authority any case of money laundering or financing of terrorism?		
VII	AML Training		
1	Does your institution provide AML training to relevant employees that include identification and reporting of transactions that must be reported to govt. authorities, examples of different forms of money laundering involving the bank products and services and internal policies to prevent money laundering?		
2	Does the FI retained records of its training sessions including attendance records and relevant training material used?		
3	Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
4	Does your institution have an established audit and compliance review function to test the adequacy of AML and terrorist financing procedures?		
5	Does the FI 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?		
VIII	Documents to be enclosed in support:		
a.	Bank Licence		
b.	Memorandum of Association		
c.	Articles of Association		
d.	KYC guidelines/Policy		
e.	AML Policy		

f.	List of shareholders with percentage		
g.	List of Directors		
h.	List of Top Management officials		

(Signature)

Money Laundering Reporting Officer
Name of Principal Officer (MLRO):
FI Name:
Location:
Tel:
Fax:
E-mail:

Date: