

Public Bank (Hong Kong) Limited
Anti-Money Laundering and Know Your Customer Questionnaire

Date: _____

Name of Respondent Institution: _____

Re: Anti-Money Laundering and Know Your Customer Questionnaire (“AML Questionnaire”)

For compliance with our policy and the requirements of the Hong Kong Monetary Authority in relation to Anti-Money Laundering and Know Your Customer, it is necessary for us to obtain the updated information of our Correspondent Banks. We would therefore be grateful if your institution would send the completed AML Questionnaire by swift to CBHKHKHH or via email to figom@publicbank.com.hk or by fax to (852) 2543-4849 or by mail to Public Bank (Hong Kong) Limited, Public Bank Centre, 120 Des Voeux Road Central, Hong Kong, Attention: Financial Institutions Department.

A. Your Institution's Information		
1.	Full legal name:	
2.	Full address of registered office:	
3.	Address of principal place of business (if different from above):	
4.	Name and Place of Stock Exchange (if listed):	
5.	Principal business activities (products and services):	
6.	Purpose, reason and business rationale for opening accounts or maintaining correspondent relationship with us:	

B. Regulatory Information		
1.	Name of the banking supervisory authority in your country:	
2.	Name of your anti-money laundering and/or anti-terrorist financing (“AML”) regulatory authority and legislative your Institution is subjected to:	

C. Ownership and Management Information			
1.	Name of shareholder(s) who owns or controls 10% or more of the shares in your institution (Please indicate percentage of ownership for each shareholder/owner or provide separate sheet/chart on it.) If no shareholder has the shareholding or control 10% or more, name of the top 10 largest shareholders.	<u>Name</u>	<u>Ownership (%)</u>
2.	Current list of your Institution's Board of Directors and senior management or provide separate sheet/chart on it. (please state the names as appeared on the identification documents such as identity cards/passports)	<u>Name</u>	<u>Position</u>

D. General Anti-Money Laundering Policies, Practices & Procedures			
If you answer “no” to any question, additional information can be supplied at the end of the questionnaire.			
I. General AML Policies, Practices and Procedures:		Yes	No
1.	Is the AML compliance program approved by the Bank’s or Financial Institution’s (“FI”) board or a senior committee?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input type="checkbox"/>	<input type="checkbox"/>
4.	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?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the FI 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?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?	<input type="checkbox"/>	<input type="checkbox"/>
8.	Does the FI have record retention procedures that comply with applicable law?	<input type="checkbox"/>	<input type="checkbox"/>
9.	Are the FI’s AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	<input type="checkbox"/>	<input type="checkbox"/>
II. Risk Assessment		Yes	No
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input type="checkbox"/>	<input type="checkbox"/>
III. Know Your Customer, Due Diligence and Enhanced Due Diligence		Yes	No
12.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	<input type="checkbox"/>	<input type="checkbox"/>
13.	Does the FI have a requirement to collect information regarding its customers’ business activities?	<input type="checkbox"/>	<input type="checkbox"/>
14.	Does the FI assess its FI customers’ AML policies or practices?	<input type="checkbox"/>	<input type="checkbox"/>
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and “Know Your Customer” information?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Does the FI prohibit direct use of the correspondent account by the customer to transact business on behalf of FI i.e. payable-through accounts?	<input type="checkbox"/>	<input type="checkbox"/>
19.	If the answer to question 18 is no, does the FI conduct the following: <ul style="list-style-type: none"> i) Verify the identities of, and continuously monitor its business relationship with those customers, in accordance with the AML/CFT requirements issued by the government supervisors/regulators in its jurisdiction. ii) Be able to provide to Public Bank (Hong Kong) Limited, on request, the documents, data or information obtained by the FI in relation to those customers. 	<input type="checkbox"/>	<input type="checkbox"/>
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		Yes	No
20.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input type="checkbox"/>	<input type="checkbox"/>
21.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input type="checkbox"/>	<input type="checkbox"/>
22.	Does the FI have a database of persons, entities, countries or terrorist issued by government/competent authorities and screen customers and transactions against the database?	<input type="checkbox"/>	<input type="checkbox"/>

