نموذج مكافحة غسل الأموال
AML Questionnaire

This form is for Correspondent banks & Financial Institutions (Certified Investment Company)

As per our Regulator, Capital Market Authority (CMA) guidelines / directives and as per our company's internal KYC / AML guidelines, the following questions are intended to facilitate our understanding of the Anti-Money Laundering Policies and Procedures in your institution. Please complete all questions and return your response along with requested documents. By courier with copy by E-Mail to Compliance@emiratesNBDCapital.com.sa Attn: Head of Compliance, ENBD Capital KSA.

I. General Information	
Organization Name:	
License No. & Date:	
Regulatory Name:	
Address:	
Registered Office Location :	
Head Office at:	
Principal Operating Office Location :	
E-mail:	
Website:	
AML Officer Contact Info:	Name: Title: Phone: Fax: Email:
If listed in a stock exchange, please specify:	

	II. General AML policies, Practices and Procedures:	YES	NO
1	Has the country in which you are located established laws designed to prevent money laundering?		
2	Does your F.I. (Investment Company) has 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 F.I?		
3	Does the law in your country require banks to have procedures for the prevention of money laundering?		
4	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 F.I.?		
5	In addition to inspections by the government supervisors/ regulators, does your F.I. (Investment Company) have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
6	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)		
7	Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices?		
8	Does your F.I. (Investment Company) have appropriate record retention procedures pursuant to applicable law?		
9	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?		
10	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 organization to which your country belongs, e.g. the name of the FATF-style regional body to which your country belongs?		

	III. Risk:	YES	NO
1	Does your F.I. (Investment Company) have a risk focused assessment of its customer base and transactions of its customers?		
2	Does your institution (Investment Company)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 categorized countries?		

	IV. Know Your Customer, Due Diligence and Enhanced Due Diligence:	YES	NO
1	Has your institution (Investment Company) 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 (Investment Company) 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 retain in your possession for reference?		
3	Does your F.I. (Investment Company) collect information and to comply with your AML policies or practices?		
4	Does your institution (Investment Company) take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?		
5	Does your institution (Investment Company) open accounts for persons using ANONYMOUS names or those who demand that their ID is not to be disclosed?		
6	Does your AML/CTF/KYC policies & Procedures require identifying and prohibiting using third party of your correspondent banking accounts?		

	V. Reportable transactions and prevention and detection of transactions with illegally obtained funds:	YES	NO
1	Does your institution (Investment Company) have policies for the identification and reporting of transactions that are required to be reported to the authorities?		
2	Does your institution (Investment Company) 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 (Investment Company) have procedures to identify transaction structured to avoid large cash reporting requirements?		
4	Does your institution (Investment Company) have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell bank through any of its accounts?		
5	Does your institution (Investment Company) have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to work in their countries of origin?		

	VI. Transaction Monitoring:	YES	NO
1	Does your F.I. (Investment Company) have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as traveler checks, money orders, etc.)?		

	VII. AML Training:	YES	NO
1	Does your institution (Investment Company) provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities with examples of different forms of money laundering involving the bank products and services and internal policies to prevent money laundering?		
2	Does your F.I. (Investment Company) retain records of its training sessions including attendance records and relevant training material used?		
3	Does your institution (Investment Company) communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
4	Does your institution (Investment Company) have an established audit and compliance review function to test the adequacy of AML and terrorist financing procedures?		

5	Does your F.I. (Investment Company) employ agents to carry out some of the functions of your F.I. (Investment Company) and if so does your F.I. (Investment Company) provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities with examples of different forms of money laundering involving your (Investment Company) F.I's products and services and internal policies to prevent money laundering?		

	VIII. Documents to be enclosed in support:
	Please provide duly attested copy of the following documents: **1.** Organization License **2.** Commercial registration **3.** Memorandum of Association **4.** Articles of Association **5.** KYC/ AML/CTF Policy & Procedures guidelines **6.** List of shareholders exceeding 10%. **7.** List of Directors **8.** List of Top Management officials

Completed By	
Name	Title
Date	Signature
Compliance / AML Name	Title:
Date	Signature
Stamp / Seal:	