

**AML/CFT
QUESTIONNAIRE**



**GAZPROMBANK
(Open Joint-stock Company)**

Please fill in below Questionnaire by crossing the Y (Yes) or N (No) box. Please note that there are no correct or incorrect responses. IF you answer a question with No, please provide us with an explanation. If you answer a question with a yes and you like to provide us with more background information you can do this as well. In the Questionnaire you find a reference to FI, Financial Institution. This should be read as the bank on whose behalf you fill in this Questionnaire.

Financial Institution Name:	
Location:	

I. General Issues:	Y	N
1. Are money laundering and financing of terrorism considered as crimes in your country (territory)? Explanation:		
2. Has your country (territory) established laws/regulations on prevention of money laundering and financing of terrorism? Explanation:		
3. Has your country (territory) established an FIU? Explanation:		
4. Is there any local supervisory/regulatory body regulating the FI's activity in your country (territory)? Explanation:		
II. General AML/CFT Policies, Practices and Procedures:	Y	N
5. Has the FI established and implemented an AML/CFT compliance program and related procedures? Explanation:		
6. Is the AML/CFT compliance program approved by the FI's board or a senior committee? Explanation:		
7. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/CFT framework? Explanation:		
8. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions? Explanation:		
9. 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/CFT policies and practices on a regular basis? Explanation:		
10. Does the FI permit to open and keep anonymous accounts? Explanation:		
11. Does the FI permit to open and keep fictitious accounts? (accounts that are opened by unidentified persons or accounts that are opened to provide transactions without client identification) Explanation:		
12. Does the FI permit to open accounts with "passbooks"? (any person who has a passbook has the right to use the account) Explanation:		
13. Does the FI 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.) Explanation:		

14. 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? Explanation:		
15. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates? Explanation:		
16. Does the FI have record retention procedures that comply with applicable law? Explanation:		
17. Are the FI's AML/CFT 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? Explanation:		
18. Are the FI's AML/CFT policies and procedures regularly reviewed? Explanation:		
III. Risk Assessment:	Y	N
19. Does the FI have a risk-based assessment of its customer base and their transactions? Explanation:		
20. 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? Explanation:		
IV. Know Your Customer, Due Diligence and Enhanced Due Diligence:	Y	N
21. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (<i>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</i>)? Explanation:		
22. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? Explanation:		
23. Does the FI have a requirement to collect information regarding its customers' business activities? Explanation:		
24. Does the FI assess its FI customers' AML/CFT policies or practices? Explanation:		
25. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? Explanation:		
26. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information? Explanation:		
27. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? Explanation:		
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:	Y	N
28. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? Explanation:		
29. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? Explanation:		
30. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? Explanation:		
31. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin? Explanation:		
	Y	N

VI. Transaction Monitoring:		
32. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler's checks, money orders, etc? Explanation:		
VII. AML/CFT Training:	Y	N
33. Does the FI provide AML/CFT 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 and financing of terrorism involving the FI's products and services; - internal policies to prevent money laundering and financing of terrorism. Explanation:		
34. Does the FI retain records of its training sessions including attendance records and relevant training materials used? Explanation:		
35. Does the FI communicate new AML/CFT related laws or changes to existing AML/CFT related policies or practices to relevant employees? Explanation:		
36. Does the FI employ third parties to carry out some of the functions of the FI? Explanation:		
37. If the answer to question 36 is yes, does the FI provide AML/CFT training to relevant third parties that includes: - identification and reporting of transactions that must be reported to government authorities; - examples of different forms of money laundering and financing of terrorism involving the FI's products and services; - internal policies to prevent money laundering and financing of terrorism. Explanation:		
VIII. Space for Additional Information:		

Name:	
Title:	
Function:	
Signature:	
Date:	