

INSTITUTION NAME:
LOCATION:

ANTI-MONEY LAUNDERING QUESTIONNAIRE		
BASIC INFORMATION		
1	Full Legal name of Company	
2	Legal Address	
3	Contact Address	
4	Legal Status (Publicly held or privately owned; are your shares listed, if yes, on which stock exchange)	
5	List of jurisdictions where your subsidiaries are located	
6	Registration Number, date of Registration	
7	Ownership Structure	
8	Management structure. Do you have any Politically Exposed Persons in the management?	
9	Number of Employees	
10	Number of Branches	
11	Principal lines of Business	
12	Name of local regulatory body regulating your activities	

GENERAL AML POLICIES, PRACTICES & PROCEDURES		YES	NO
13	a. Are you subject to supervision in the country you operate by your regulators? Regulator: <input type="radio"/> BOJ <input type="radio"/> FSC <input type="radio"/> Other _____	<input type="radio"/>	<input type="radio"/>
	b. Are you in possession of a valid BOJ Cambio Licence?	<input type="radio"/>	<input type="radio"/>
14	Does your institution have a legal and regulatory compliance programme that includes a designated officer and responsible for overseeing AML framework? Name: _____ Contact #: _____	<input type="radio"/>	<input type="radio"/>
15	Is the AML Compliance programme approved by your board or a senior committee? Comment: _____	<input type="radio"/>	<input type="radio"/>
16	Do you have documented AML / CFT policies stating the processes to prevent detect and report suspicious transactions? (Kindly provide a copy of your board approved AML/CFT Policy Manual)	<input type="radio"/>	<input type="radio"/>
17	In addition to inspections by BOJ, do you have an internal audit function or other independent AML/CFT policy reviews? If so, how often and when was the last audit done? _____	<input type="radio"/>	<input type="radio"/>

18	Do you have policies covering relationships with Politically Exposed Persons (PEPs), their families and close associates?	<input type="radio"/>	<input type="radio"/>
19	Does your institution have a policy prohibiting accounts / relationship with shell banks?	<input type="radio"/>	<input type="radio"/>
20	Does your institution have record retention procedures that comply with applicable law?	<input type="radio"/>	<input type="radio"/>
21	Are there controls and sanctions in place to ensure detection and reporting procedures are being followed?	<input type="radio"/>	<input type="radio"/>
22	Are your institution's AML Policies and practices applied to all branches and subsidiaries?	<input type="radio"/>	<input type="radio"/>

RISK ASSESSMENT		YES	NO
23	Is your institution a money services business (exchange house, casa de cambio / remittance)?	<input type="radio"/>	<input type="radio"/>
24	Have there been any recent material ownership changes or recent changes in the Executive Management structure within the last 5 years? Describe the change: _____	<input type="radio"/>	<input type="radio"/>
25	Do you have a risk based assessment of your customer base and their transactions?	<input type="radio"/>	<input type="radio"/>
26	Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that you believe to pose a heightened risk of illicit activities?	<input type="radio"/>	<input type="radio"/>

KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE		YES	NO
27	Have you implemented processes for the identification of customers?	<input type="radio"/>	<input type="radio"/>
28	Is there a process in place to identify repeat customers?	<input type="radio"/>	<input type="radio"/>
29	Are KYC details and source of funds determined for your transactions over USD\$1,000 and above and repeat customers?	<input type="radio"/>	<input type="radio"/>
30	Does your institution assess its (FI, Cambio, Remittance) customers' AML policies or practices?	<input type="radio"/>	<input type="radio"/>
31	Do you have procedures in place for advanced due diligence on high risk customers? If so, describe: _____	<input type="radio"/>	<input type="radio"/>
32	Do you have procedures to establish a record for each new customer noting their respective identification documents and KYD information?	<input type="radio"/>	<input type="radio"/>
33	Do you monitor account activity to determine those transactions of its customers that do not conform with the normal or expected transactions for that customer?	<input type="radio"/>	<input type="radio"/>

REPORTABLE TRANSACTIONS AND PREVENTION AND DETECTION OF TRANSACTIONS WITH ILLEGALLY OBTAINED FUNDS		YES	NO
34	Do you have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input type="radio"/>	<input type="radio"/>
35	Do you screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?	<input type="radio"/>	<input type="radio"/>

TRANSACTION MONITORING		YES	NO
36	Do you have a monitoring program for unusual and potentially suspicious activity?	<input type="radio"/>	<input type="radio"/>

AML TRAINING		YES	NO
37	Do you provide AML 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. * Internal policies to prevent money laundering.	<input type="radio"/>	<input type="radio"/>
38	Do you retain records of its training sessions including attendance records and relevant training materials used?	<input type="radio"/>	<input type="radio"/>
39	Do you communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input type="radio"/>	<input type="radio"/>

NAME
TITLE
SIGNATURE
DATE

<p><i>I, undersigned, hereby certify that this questionnaire has, to the best of my knowledge, been completed correctly and that _____ and all its entities, including any wholly owned subsidiaries, affiliates or members, have policies, programmes and procedures in place designed to ensure compliance in all respects with regard to all anti-money laundering and anti-terrorist financing legislation and regulations in each jurisdiction in which it operates and that any weakness identified as a result of regulatory review are being addressed. Further, that there are no known circumstances which could expose Alliance Financial Services Ltd and its groups of companies to any liability for money laundering or terrorist financing and that to the best of your knowledge and belief, your organization's AML/CFT policies and procedures have been implemented and are working effectively.</i></p>
Signature
Date

INTERNAL USE ONLY
Date Received
Reviewed by
Comments