



UNION BANK UK PLC
CORRESPONDENT BANKING
AML QUESTIONNAIRE

Version 1.1
April 2013



Bank Name:

Address:

Name and contact details of Head of AML Compliance:

No.	Question	Bank Response <i>(Please complete as fully as possible)</i>	Follow-up Comments
1. AML Program: Describe the structure of the AML program and the role of Compliance.			
1a	What is the primary business activities of the Bank e.g. Personal Banking, Corporate Banking, Correspondent Banking, Trade Finance, Investments, Insurance, Private Banking?		
1b	Describe the structure and staffing of the Bank's AML Department. Please confirm the number of staff dedicated to AML related functions?		
1c	Provide the title and reporting line of the Chief / Head of the AML Department.		
1d	Does the bank have a Board approved AML Policy? How frequently is the policy updated?		
1e	Has your institution developed written policies documenting the processes to prevent, detect and report suspicious transactions that have been approved by senior management?		



No.	Question	Bank Response <i>(Please complete as fully as possible)</i>	Follow-up Comments
1. AML Program: Describe the structure of the AML program and the role of Compliance.			
1f	Do you have an independent AML Compliance function? If no, provide reasons		
1g	How are AML issues escalated to Senior Management and the Board? Describe Senior Management and Board reporting and the frequency of this reporting (i.e. AML Report submitted to the Board on an annual basis)		
1h	Is regular anti-money laundering awareness training provided to staff? If yes, please provide details of the training program, including: frequency, targeted staff and delivery method.		
1i	Does the Bank communicate new AML related laws, or changes to existing AML related policies or practices to relevant employees		
1j	Has the country in which you are located established laws designed to prevent terrorist financing?		
1k	Has the country in which you are located established a central reporting agency for the purpose of collecting and assessing suspicious transaction reports?		
1l	Total number of domestic branches and		



	subsidiaries?		
1m	Total number of international branches and subsidiaries and their locations?		

2. AML Examinations and Audits: Describe AML examinations and audits		Bank Response (Please complete as fully as possible)	Follow-up Comments
2a	Is your external auditor required to review your KYC & AML policies & procedures to ascertain that rules and regulations are fully complied with? When did the last audit take place?		
2b	Provide the date of your last AML internal audit and detail any material findings and corrective action plans.		
2c	Has your institution implemented procedures related to record retention pursuant to applicable law?		

3. Customer Due Diligence: Describe the Bank's Customer Due Diligence (CDD) process including the Customer Identification Programme (CIP) and risk ranking method.		Bank Response (Please complete as fully as possible)	Follow-up Comments
3a	Has your institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, one-off transactions (i.e. walk-in clients) etc.e.g. name, date of birth, nationality, occupation, address, valid official identification		
3b	Please describe the minimum documentation required for new customers (both individuals and corporates)		



3c	Does the Bank have a requirement to collect information regarding it's customers' business activities?		
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3. Customer Due Diligence: Describe the Bank's Customer Due Diligence (CDD) process including the Customer Identification Programme (CIP) and risk ranking method.		Bank Response (Please complete as fully as possible)	Follow-up Comments
3d	Does the Bank confirm the existence of corporations/entities and beneficial ownership via independent source documents?		
3e	Does your institution screen your customer database against proscribe lists to ensure that it is not providing financial services to a listed person or entity?		
3f	Is this client screening process completed through an automated system?		
3g	If the client screening process is completed manually, please provide the frequency in which the screening is completed.		
3h	Does your financial institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in the country they are located in?		
3i	Does your institution employ enhanced due diligence for high risk clients such as Politically Exposed Persons, Correspondent Banks, Money Service Businesses?		
3j	Who signs off new high risk customers (including PEP)?		



3k	Are Politically Exposed Persons (PEPs), their families and close associates subject to enhanced due diligence?		
3l	How frequently is the Customer Due Diligence information updated?		
3m	Do you have any arrangements in place relating to profiling of countries with which your customers conduct business?		

4. Transaction Monitoring: Describe the Bank's transaction monitoring system		Bank Response <i>(Please complete as fully as possible)</i>	Follow-up Comments
4a	Does the Bank use an automated or manual AML monitoring system? If automated, is it an internal system or purchased from a vendor? If purchased from a vendor, please indicate the name of the vendor?		
4b	At a high level, describe the parameters and thresholds of the AML monitoring system and the basis on which these parameters and thresholds were determined (i.e., customer profile, geography, product type etc).		
4c	Are cash transactions incorporated in to the Bank's automated monitoring system or handled separately?		
4d	Does the Bank initiate/process transactions on behalf of non-customers e.g. those that conduct one-off transactions?		
4e	Do you require walk-in customers to produce identification documents for reference and verify before providing any service?		



4f	Does your institution take steps to understand the normal and expected transactions of your customers based on your risk assessment of your customers?		
4g	Does your institution open or maintain anonymous accounts or numbered accounts?		
4h	Do you refuse to process an inward remittance if the source of funds is not clear?		
4i	What is the average monthly number of alerts generated by the monitoring system?		

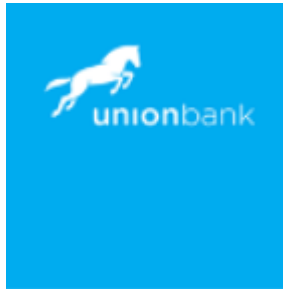
4. Transaction Monitoring: Describe the Bank's transaction monitoring system		Bank Response (Please complete as fully as possible)	Follow-up Comments
4j	Does the Bank have a dedicated staff to work alerts/cases emanating from the automated system? If yes, please state the number.		
4k	If the Bank has a manual monitoring system, please describe in detail the manual process including what the triggers are for manual review, what reports are used to conduct the manual review, etc.		
4l	Has the Bank filed large Currency Transaction Reports (CTR's) or Suspicious Activity Reports (SAR's) to its local regulator within the past year?		
4m	Does the Bank have procedures to screen for and prohibit transactions from entities / countries that have been sanctioned by the United Nations, OFAC or are the subject of similar sanctions from your local regulator?		



4n	Is an external vendor used for sanction screening, or are the sanctions lists screened manually using lists from the relevant websites? If an external vendor is used, please specify the name.		
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5. Regulatory / Law Enforcement Investigations		Bank Response (Please complete as fully as possible)	Follow-up Comments
5a	Has the Bank been the subject of any AML / Fraud / Corruption related investigations by Regulators or Law Enforcement in the past year? If yes, please detail.		
5b	Are there any restrictions on the bank on making international transfers? If so please provide details		

6. Client Base		Bank Response (Please complete as fully as possible)	Follow-up Comments
6a	Describe percentage of the Bank's customers that are retail (individuals) versus corporate?		



6b	Does the Bank offer correspondent banking services to other banks (nested relationships)? If yes, how many? What is the due diligence process for these banks. If a questionnaire is used to evaluate these banks, please provide a copy.		
6c	Does the Bank offer remittance services? If yes, is this a key business of the Bank? How does the Bank mitigate the AML risk of this business?		
6d	Does the Bank conduct business with any other type of high risk businesses such as Internet Gambling / Casinos and Currency Exchange / Casa de Cambio businesses? If yes, please detail the client type.		
7. Shell Banks		Bank Response (Please complete as fully as possible)	Follow-up Comments
7a	Does the Bank undertake business with Shell Banks? (A Shell Bank is a financial institution that does not have a physical presence in any country)		
7b	If Yes, please provide name and addresses of those Shell Banks		
8. Ownership		Bank Response (Please complete as fully as possible)	Follow-up Comments



8a	Have you been under same ownership for the past five years?		
8b	State briefly the current ownership for the Bank? Please list all owners with up to 5% Ownership Interest.		

Senior Management	Bank Response (Please complete as fully as possible)	Follow-up Comments
Chief Executive Officer:		
Full Name:		
Other Positions Held:		
Country of Residence:		

Senior Management	Bank Response (Please complete as fully as possible)	Follow-up Comments
Chief Financing Officer:		
Full Name:		



	Other Positions Held:		
	Country of Residence:		

Chairman:			
	Full Name:		
	Other Positions Held:		
	Country of Residence:		

President or equivalent			
	Full Name:		
	Other Positions Held:		
	Country of Residence:		

Board of Directors		Bank Response (Please complete as fully as possible)	Follow-up Comments
	Full Name:		
	Other Positions Held:		
	Country of Residence:		
	Full Name:		
	Other Positions Held:		
	Country of Residence:		
	Full Name:		
	Other Positions Held:		



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Other Positions Held:		
Country of Residence:		
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Other Positions Held:		
Country of Residence:		

Commercial Information		Bank Response (Please complete as fully as possible)	Follow-up Comments
	Have you closed or been requested to close accounts with a financial institution over the last five years?		

Bank Relationships at other Institutions	Bank Response (Please complete as fully as possible)	Follow-up Comments
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	Name of the bank		
	Address		
	Name of the bank		
	Address		
	Name of the bank		
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	Name of the bank		
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	Name of the bank		
	Address		
Bank Due Diligence		Bank Response (Please complete as fully as possible)	Follow-up Comments
	Number of Correspondent Banks that you provides services to?		
	Type of services provided to Correspondent Banks:		





I confirm that the above information is current, accurate and reflective of my institution's Know Your Customer/Anti Money Laundering policies.

Name: _____

Signature: _____

Position: _____

Date: _____