



MCB BANK LTD.

QUESTIONNAIRE

(FILLED-IN FOR OUR CORRESPONDENT BANKS & MONEY SERVICES BUSINESSES DEALING WITH MCB BANK)

Anti-Money Laundering, Combating Terrorist Financing & Know Your Customer

In order to comply with Bank's obligations as prescribed by AML/CTF/KYC Laws of Sri Lanka as well as regulations of the Central Bank (Central Bank of Sri Lanka), please find below details related to AML/CTF/KYC rules and laws complied in MCB Bank LTD.

Section I – General Information

1	Legal Name Of Institution:	MCB Bank Ltd - Sri Lanka (Branch office of MCB Pakistan)
2	Principal Office:	No.08, Leyden Bastian Road, Comlombo 01
3	Corporate Legal Form:	Public Limited Company
4	Date Of Establishment:	July 9, 1947 (In Pakistan) , April 12, 1994 (In Sri Lanka)
5	Name of Local Licensing Authority / Regulator:	Central Bank of Sri Lanka
6	Is there any Regulatory Authority for Supervision of your Institution?	Financial Intelligence Unit of Central Bank of Sri Lanka
7	Banking License No:	Dated 22nd April 1994
8	Taxation Identification No:	194000189 - 7000
9	Name of External Auditor:	KPMG Ford Rhodes Thornton and Company
10	Official Website Address:	www.mcb.com.lk

Section II – Non Shell Bank Arrangements

1	Institution is not a Shell Bank*	<input checked="" type="checkbox"/>
2	Institution does not maintain accounts for Shell Banks and does not conduct business with Shell Banks.	<input checked="" type="checkbox"/>

* Shell Bank means a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated financial group (cf. FATF Forty Recommendations).

Section III – Ownership and Management Information

1	Please indicate Stock Exchange Name(s) & Symbol(s) on which shares are traded: MCB Bank Ltd Pakistan is registered in Pakistan Stock Exchange, London Stock Exchange (for GDRs)
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2	Please list the names of all owners** in the table below and their ownership interest (add further rows if necessary):		
	Name and Domicile	Ownership interest (%)	Nature of ownership (direct/indirect)
	N/A		

** An "owner" is any person or legal entity that; directly or indirectly; owns or control any class of securities or other voting interests in the Institution.

3	Have there been any significant changes in ownership over the last five years? If yes, please provide details:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	N/A	

4	Are there any Politically Exposed Persons *** among your Institution's ownership structure and executive management? If yes, please provide details (name and role):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

*** Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public function, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials, or their family members or close associates. The definition is not intended to cover middle ranking or more junior individuals in the foregoing categories (cf. FATF Forty Recommendations).

Section IV – Business Activity

1	Please provide the principal types of Business Activity	
	a	Corporate Banking
	b	Retail Banking
	c	Investment Banking
	d	Trade Services
	e	Islamic Banking

Anti-Money Laundering Questionnaire

Section I - General AML Policies, Practices and Procedures:

1	Does the AML compliance program require approval of the FI's Board or a senior committee thereof?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2	Does the FI have 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 FI?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3	Has the FI 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
5	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6	Does the FI have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7	Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8	Does the FI provide training to employees regarding AML/CTF/KYC?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
9	Is the FI fully compliant with The FATF Recommendations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section II - Risk Assessment

10	Does the FI have a risk focused assessment of its customer base and transactions of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section III - Know Your Customer, Due Diligence and Enhanced Due Diligence

12	Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (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)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13	Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14	Does the FI collect information and assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section IV - Reportable Transactions and Prevention & Detection of Transactions with Illegally Obtained Funds

17	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
18	Does the FI have policies or practices to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
19	Does the FI have policies or practices to screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

20	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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
21	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that properly licensed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22	Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and *MT 205/205COV message formats? ¹	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
*		

¹ The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

V. Transaction Monitoring

23	Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers checks, money orders, etc.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VI. AML Training

24	Does the FI 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 involving the FI's products and services and internal policies to prevent money laundering?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
25	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
26	Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
27	Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the FI's products and services and internal policies to prevent money laundering?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

I hereby confirm that the statements given above are true and correct. I also confirm that I am authorized to complete this document.

A.K.R.A.Fernando Department Head Compliance No.08, Leyden Bastian Road, Colombo 01 Sri Lanka	A.K.R.A.Fernando Department Head Compliance No.08, Leyden Bastian Road, Colombo 01 Sri Lanka
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Name, designation & address of Chief Compliance Officer of the Institution

Completed by:
Name, designation and Signature

Date: 18-Apr-18

Official Contact Address: No.08, Leyden Bastian Road, Colombo 01

Telephone No(s): 011 5 222 230

E-mail Address: compliance.queries@mcb.com.lk

Please send your queries, if Any by e-mail to: compliance.queries@mcb.com.lk
(OR) via courier to the following postal address:

Compliance Department
No.08,
Layden Bastian Road,
Colombo 01.