



Wolfsberg Anti-Money Laundering Certification		
If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.		
1. General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	YES	
2. Does the MSB have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	YES	
3. Has the MSB developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES	
4. In addition to inspections by the government supervisors/regulators, does the MSB client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	YES	
5. Does the MSB 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.)	YES	
6. Does the MSB 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?	YES	
7. Does the MSB have policies covering relationships with Politically Exposed Persons (PEP's), Heads of International Organizations and their family and close associates?	YES	
8. Does the FI have record retention procedures that comply with applicable law?	YES	
9. Are the MSB's AML policies and practices being applied to all branches and subsidiaries of the MSB both in the home country and in locations outside of that jurisdiction?	YES	
I I . Risk Assessment	Yes	No
10. Does the MSB have a risk-based assessment of its customer base and their transactions?	YES	
11. Does the MSB 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?	YES	
I I I . Know Your Customer, Due Diligence and Enhanced Due Diligence	Yes	No
12. Has the MSB implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES	
13. Does the MSB have a requirement to collect information regarding its customers' business activities?	YES	
14. Does the MSB assess its MSB customers' AML policies or practices?	YES	
15. Does the MSB have a process to review and, where appropriate, update customer information relating to high risk client information?	YES	
16. Does the MSB have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	YES	



17. Does the MSB complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	Yes	No
18. Does the MSB have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES	
19. Where cash transaction reporting is mandatory, does the MSB have procedures to identify transactions structured to avoid such obligations?	YES	
20. Does the MSB screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	YES	
21. Does the MSB have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	YES	
22. Does the MSB adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	YES	
V. Transaction Monitoring	Yes	No
23. Does the MSB have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	YES	
VI. AML Training	Yes	No
24. Does the MSB 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. Internal policies to prevent money laundering.	YES	
25. Does the MSB retain records of its training sessions including attendance records and relevant training materials used?	YES	
26. Does the MSB communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES	
27. Does the MSB employ third parties to carry out some of the functions?	NO	
Name	Amanda L. Archibald	
Title	Chief Anti-Money Laundering Officer	
Signature		
Date	January 11, 2018	

