

Anti Money Laundering (AML) & Know Your Customer (KYC) Questionnaire

Emirates NBD Bank (PJSC) provides the following standard Anti Money Laundering (AML) and Know Your Customer (KYC) Questionnaire covering its Head Office and domestic branches in the UAE.

1. Institution Name: Emirates NBD Bank (PJSC)
2. Address:
Registered Office : P.O. Box 777
Dubai, United Arab Emirates
Principal place of business: Banlyas Road, Deira, Dubai, United Arab Emirates
Location of Head Office : Same as above
3. Commercial Registration No: 1013450- Department of Economic Development, Government of Dubai.
4. Compliance Contact Name: **Michael Sai Chun Wong** (Head of Anti Money Laundering)
Email address: **MichaelWON@EmiratesNBD.com**
5. Website address:
<http://www.emiratesnbd.com>
6. a) Are you publicly owned?
Yes No
Ownership Structure Emirates NBD Bank (PJSC) is a Public Joint Stock Company listed on the Dubai Financial Market exchange, which is 55.76% owned by the Government of Dubai and no other single shareholder holds more than 10% of the remaining 44.24% shares.
b) Are you listed on any stock exchange? If so, please specify the name?
Yes No
Emirates NBD Bank (PJSC) is listed on the Dubai Financial Markets ("DFM").
c) Has there been any significant change in the ownership of the FI (exceeding 25%) over the last one year?
Yes No

d) Does the FI have Politically Exposed Persons (PEPs) that are Shareholders of its Bank, or members of its board of directors or senior managers?

Yes No

7. Is money laundering a criminal offence in your country?

Yes No

8. Are there specific laws and/or regulations in place covering Anti-Money Laundering? If so, what are these called?

Yes No

Federal Law No. (7)/2014 replaced the earlier Federal Law No. (1)/2004 on Combating Terrorist Crimes; criminalizing terrorist financing and terrorist offences (dated 20th August 2014).

Federal Law No. (9)/2014 amended certain provisions (e.g. predicate offences) of Federal Law No. (4)/2002 concerning the Combating of Money Laundering Crimes (dated 26th October 2014).

Regulations concerning Procedures for Anti-Money Laundering dated 14 November 2000 and subsequent amendments issued by the Central Bank of the United Arab Emirates (2922/2008 dated 17th June 2008).

9. Has the FI been prosecuted or fined for failure to comply with anti - money laundering laws in the last 5 years?

Yes No

10. Do the laws and regulations in your jurisdiction limit or prohibit the opening or maintenance of anonymous or numbered accounts?

Yes No

11. Do the regulations require banks / financial institutions to Know Your Customer before transacting any business with them?

Yes No

12. Do the regulations require banks / financial institutions to have effective controls in place to prevent and identify the proceeds of crime being laundered through their systems?

Yes No

13. Do the regulations require banks / financial institutions to report any suspicious transactions to a law enforcement or other agency designed for that purpose?
- Yes No
14. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?
- Yes No
15. Is the AML compliance program approved by the FI's Board or a senior committee?
- Yes No
16. Are the FI's AML 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?
- Yes No
17. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?
- Yes No
18. Does the FI provide AML training to relevant employees that include 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
- Yes No
19. Does the FI retain records of its training sessions including attendance records and relevant training materials used?
- Yes No
20. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?
- Yes No
21. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?
- Yes No

22. Does the FI rely on automated processes in order to detect usual activity related to money laundering?

Yes No

23. Where a cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?

Yes No

Whilst there is no threshold for reporting suspicious activities, Emirates NBD has detailed STR reporting procedures which entails reporting regardless of value of transaction.

24. 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.?

Yes No

25. Does the FI provide downstream correspondent banking services to other financial institutions?

Yes No

26. 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?

Yes No

27. 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)?

Yes No

28. 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?

Yes No

29. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?

Yes No

30. 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?
Yes No
31. Does the FI have a risk based assessment of its customer base and their transactions?
Yes No
32. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?
Yes No
33. Does the FI have a requirement to collect information regarding its customers' business activities?
Yes No
34. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?
Yes No
35. Does the FI have a process review and, where appropriate, update customer information relating to high risk client information?
Yes No
If yes, does the FI apply an enhanced due diligence on such accounts:
Yes No
36. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?
Yes No
If yes, does the FI apply an enhanced due diligence on such accounts:
Yes No
37. Does the FI screen its transactions against sanctions lists?
Yes No

38. Does the FI employ third parties to carry out some of the functions of the FI?

Yes No

39. If the answer to Question 38 is yes, does the FI provide AML 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 involving the FI's products and services and internal policies to prevent money laundering?

Yes No

40. Does the FI assess its FI customers' AML policies or practices?

Yes No

41. Does the FI have record retention procedures that comply with applicable law?

Yes No

42. 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 policies and practices on a regular basis

Yes No

I confirm that I am authorized to complete this document.

Name: Michael Sai Chun Wong
Title: Head of Anti-Money Laundering
Emirates NBD Bank (PJSC)
Dated: 10th January, 2018