FidBank UK Professional Firms AML Program Assessment Questionnaire

FIDBANK UK QUESTIONS	FOR CLIENT
A. Overview of your Firm:	
1. Please provide a brief overview of your Firm, including a list of products and services, and its organisational structure (including number of employees, customers, with a breakdown between corporate & retail, etc.)	
B. AML Program:	
1. Describe the structure of the AML Program and the role of Compliance.	
2. Describe the structure and staffing of your Firm's AML Department. Please confirm the number of staff dedicated to AML-related functions and their responsibilities.	
3. Provide the title and reporting line of the Chief or Head of the AML Department to Senior Management.	
4. Has your Firm appointed a Money Laundering Reporting Officer (MLRO)? Is the MLRO within the AML / Compliance team?	
5. Does your Firm have a Board-approved AML Policy? How frequently is the policy is updated? Were there major revisions to the Policy since the last update?	
6. How are AML issues escalated to Senior Management and the Board? 7. Please explain in detail how senior management and the Board exerts oversight on your Firm's AML framework. 8. Describe Senior Management and Board reporting and the frequency of this reporting.	

9. What is the oversight exerted by the Parent – Please explain in detail (e.g. any oversight meetings/other forums & frequency, site visits, reports, testing etc.)	
10. Is regular anti-money laundering awareness training provided to staff, including for new hires? If yes, please provide details of the training program: a. Frequency, targeted staff and delivery (Are trainings held online or in classrooms?); 11. Does your Firm provide refresher AML training to its employees? If yes, please provide further details including frequency, targeted staff, delivery etc. 12. Also, any other focused training (especially for employees managing AML)	
13. Does your Firm's AML Program have a list of prohibited clients/accounts/ relationships?	
14. Does your Firm's AML Program have a list of high-risk clients/accounts/ relationships?	
C. AML Examinations and Audits:	
1. Describe your Firm's AML examinations and audits results.	
2. Does your Firm have an independent internal audit function? Please advise how many staff, reporting line etc.	
3. What is the expected frequency of internal audit review on Your Firm's AML controls?	
4. Provide the date of your last AML internal audit and discuss any findings and corrective action plans.	

5. Provide the date of your last AML external audit, by whom it was conducted and discuss any findings and corrective action plans.	
6. Are (domestic) branches, if any, subject to IA? Frequency and any major findings in the last two years and details of corrective action plan.	
7. Provide the date of the last AML regulatory examination and discuss any findings and corrective action plans.	
D. Customer Due Diligence:	
1. Describe your Firm's customer due diligence process, including identification and verification of customers, and how customers are risk ranked.	
2. Describe the minimum documentation required for new customers.	
3. How are customer identities verified?	
4. How does your Firm risk rank its customer base?	
5. What percentage does your Firm identify ultimate beneficial ownership for entities? a. Is this to first level or ultimate level?	
6. How is negative news identified for prospective and existing clients and what actions are taken upon identification?	
7. Are politically exposed persons (PEPs) identified and subject to enhanced due diligence? If yes, briefly describe the enhanced due diligence applied, including how PEPs are identified.	
8. Do your policies and procedures require the identification of account owners to what beneficial ownership level/threshold?	
9. Are there controls in place to identify shell companies?	
10. How frequently is the customer due diligence information updated?	
11. Describe your Firm's customer base, including industry types served, the geographies where your Firm's customers conduct business.	

12. What customer types require enhanced due diligence? Describe what your enhanced due diligence process entails.	
E. Transaction Monitoring:	
1. Describe your Firm's transaction monitoring system for AML-related alerts.	

2. Does your Firm use an automated or manual monitoring system?
   a. If automated, is it an internal system or purchased from a vendor? If purchased from a vendor, please indicate the vendor.
   b. If manual, are there plans to move to an automated system? In what time frame?
   c. How long has your Firm used the system?	

3. At a high level, describe the parameters /scenarios and thresholds of the system and the bases for determining these parameters and thresholds (i.e., customer profile, geography, scenarios).	
4. Are cash transactions incorporated in your automated system or handled separately?	
5. What is the average monthly number of alerts generated by the monitoring system?	
6. Does your Firm have a dedicated staff to work alerts/cases emanating from the automated system?	
7. Are first level alerts reviewed in local/regional levels initially or are all alerts reviewed in a central system?	
8. How many currency transactions reports or suspicious activity reports to its local regulator in the current year?	
9. If your Firm has a manual 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.	
10. Has your Firm filed a large number of currency transaction reports or suspicious activity reports to its local regulator in the current year compared to prior years, if yes – reasons for the same?	
11. Are accounts closed or maintained upon SAR filings?	

F. Sanctions Screening:	
1. Please provide overview of your Firm's Sanctions Screening Program? This includes: a. Manual or automated process/system; b. Names of systems used to screen customers and transactions (please distinguish if the systems differ); c. Screening match tolerances (i.e. fuzzy logic matching thresholds, etc.); and d. The average volume of sanctions alerts (including how many staff are responsible for such reviews) and review process (including how many staff are responsible for such reviews).	
2. Independent of local law requirements, does your Firm screen against additional lists published by the UN, EU, or OFAC?	
3. Does your Firm have procedures to screen for and prohibit transactions from entities / countries that have been sanctioned by the UN, EU, OFAC, or are the subject of similar sanctions from your local regulator?	
4. Does the jurisdiction in which your Firm operates mandate sanctions compliance? If so, which sanctions regime does the jurisdiction follow: local law implementing selected United Nations (UN) resolutions, all UN sanctions programs, European Union (EU) sanctions programs, or U.S./Office of Foreign Assets Control (OFAC) sanctions?	
5. Are both customer static data and transactional data screened? Please describe the process. What is the frequency of screening?	
6. Has your Firm blocked or rejected customer property or transactions during the past year?	
7. Are blocked or rejected items reported to the local regulators/government?	
G. Mandatory Sanctions Questions:	
Does your Firm maintain accounts for or provide products or services to, for the benefit of, or at the direction or order of individuals or entities appearing on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) or entities owned or controlled by any of the foregoing?	

a. In addition, does your Firm maintain accounts for or provide products or services to, for the benefit of, or at the direction or order of entities owned or controlled by Cubans (wherever located), or persons or entities located in Iran, North Korea, Syria, or the Crimea, Luhansk or Donetsk regions? b. If the response is in the affirmative, additional details, as noted on the questionnaire must be obtained concerning the Iranian, Cuban, North Korean, or Syrian individual or entities involved, the number and types of transactions and the reasons this business is conducted.	

H. Public Records and Material Negative Media:	
1. How do you screen negative news? Is it automated or manual?	
2. Who is responsible for this and what is the escalation path when a negative news is identified on any of your customers?	
3. Provide details on significant or material negative news involving AML, fraud or corruption and any existing AML regulatory action.	
4. Discuss any regulatory enforcement actions or public records detailing significant or material news involving AML, fraud, or corruption as appropriate. a. What is the current status? b. What remedial actions have been taken or are planned to be taken?	

I. Lines of business that may pose additional AML risk, including the offering of remittance services:	
1. Does your Firm offer remittance services and, if so, is this a key business of your Firm? a. How does the CB mitigate the AML risk of this business? b. Do the remittance services flow through the FidBank UK account? If so, are the services provided by exchange houses or trading companies?	
2. Does your Firm offer Payable-Through Accounts? *These are prohibited by FidBank UK policy.*	
3. Are there any other high-risk businesses such as MSBs or internet gambling companies?	

a. If yes, will the activity flow through FidBank UK? b. What are the expected values/volume?	
4. Does your Firm offer products or services directly to virtual currency operators, e.g. miners and/or exchanges? If yes, will the activity flow through FidBank UK? (*Please provide expected values/volume if possible*)	
5. Does your Firm permit transactions to or from virtual currency operators at the instruction of their own customers? a. Does your Firm require any additional due diligence in respect of these transactions? b. How are these transactions monitored for suspicious activity?	
6. Does your Firm hold accounts for any of the following entities/client types: a. Charities / NGOs; (please specify if registered or unregistered) b. Embassies, Foreign Legations or Consular Offices; c. Casinos, On-line Betting Companies or Gaming Companies; d. Mobile Money Operators. If yes, will the activity flow through FidBank UK? (*Please provide expected values/volume if possible*)	
7. What are your Firm's controls surrounding Cyber Crime and Fraud?	

Completed by (name and job title):

Date: