

**KNOW YOUR CUSTOMER /
 ANTI-MONEY LAUNDERING
 & COUNTERING FINANCING OF TERRORISM**

Section I – General Administrative Information			
Legal Name of Institution	[Redacted]		
Legal Form	[Redacted]		
SWIFT Address	[Redacted]		
Website	[Redacted]		
Principal Place of Business (Address)	[Redacted]		
Registered Place	[Redacted]		
Banking License issuing authority, date and number	[Redacted]		
Does your Institution maintain a physical presence ¹ in the licensing country?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Is your institution an agency, branch or subsidiary of a bank with a physical presence ¹ ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, please answer the following questions :			
Name of affiliate / parent company	[Redacted]		
Is affiliate / parent company publicly traded?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, list exchanges and symbol	[Redacted]		
Indicate affiliation	<input type="checkbox"/> Agency	<input type="checkbox"/> Branch	<input type="checkbox"/> Subsidiary
Licensing country of affiliate	[Redacted]		
Is your institution a publicly traded entity ² ?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, list the exchanges & symbols	[Redacted]		
Is your good bank possible to issue bearer stocks?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, any ownership in your institution held in bearer shares?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Officer Responsible for Account / Relationship :	Officer Responsible for Compliance :		
[Redacted]	[Redacted]		
Telephone No.	[Redacted]	Telephone No.	[Redacted]
Fax No.	[Redacted]	Fax No.	[Redacted]
E-mail Address	[Redacted]	E-mail Address	[Redacted]
¹ Physical presence means your institution maintains a physical place of business, other than an electronic address, in a country where it is authorized to conduct banking activities, at which it employs at least one employee on a full-time basis and maintains records of its banking activities, and is subject to supervision by the regulators of the country authorizing the institution's license.			
² If your institution is an agency, branch or subsidiary of a publicly traded entity that is listed on one of the exchanges listed in Appendix B, the answer to the question should be "Yes."			

Section II – Scope of Business Activities

Please list the principal countries in which your institution maintains branches, agencies and subsidiaries. Additionally, please indicate the type of operation and the number of offices or locations. (Please attach additional pages if necessary.)

Country	Type (Branch, Agency, Subsidiary, etc.)	Number

Section III– Ownership and Management Information

If your institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B, please list the names of the owners of your institution and their ownership interest. Also, please list the names of the senior management and directors of your institution. (For purposes of this questionnaire, an “owner” is any person or juridical entity that, directly or indirectly, owns, controls or has voting power of twenty five percent (25%) or more of any class of securities of your institution.)

Name	Birth Date (YYYY/MM/DD)	Nationality	ID/ Passport NO	(1) Ownership Interest (%)	(2) The natural person ultimately has a controlling ownership interest. (Please tick.)	(3) The natural person holds the position of senior managing official (Director, General Manager or higher level officers) (Please tick and specify the title.)	PEPs ³ (Y/N)

Do PEPs oversee the business (day-to-day operations) between Bank SinoPac and your institution? Yes No

³ Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public functions, for example head 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 of more junior individuals in the foregoing categories (cf. FATF Forty Recommendations).

AML QUESTIONNAIRE

I. General AML Policies, Practices and Procedures		Answer	
		Yes	No
1	Is the AML compliance program approved by the FI's board or a senior committee?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構之洗錢防制遵循計畫是否經董事會或高階經理委員會之核准？		
2	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?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	洗錢防制遵循計畫中是否有指定專責主管，負責協調及監督洗錢防制架構？		
3	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否制定書面政策，規範預防、偵測、申報可疑交易的流程？		
4	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?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否設有一個內部稽核部門，或者委任其他獨立之第三方，定期性地評估洗錢防制政策及處理規章？		
5	Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否禁止為空殼銀行開立帳戶及建立業務關係？(空殼銀行係指該銀行在其註冊成立所在地並無實體存在，同時亦不附屬於任何受監管的金融事業集團)		
6	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 type="checkbox"/> Y	<input type="checkbox"/> N
	是否有制定政策以確保金融機構不會與空殼銀行或透過其帳戶或商品與代表空殼銀行從事任何交易活動？		
7	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否有政策規範與高知名度政治人物及其家屬、密切關係人之往來關係？		
8	Does the FI have record retention procedures that comply with applicable law?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否依法律規定制定適當文件保存程序？		
9	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?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	是否要求在國內及境外地區的所有分行及子公司，均遵守總行的洗錢防制政策及規章？		
II. KYC/CDD/EDD		Answer	
		Yes	No
10	Does the FI have a risk-based assessment of its customer base and their transactions?	<input type="checkbox"/> Y	<input type="checkbox"/> N
	是否有對客戶及其交易活動進行風險評估？		
11	Does the FI determine the appropriate level of enhanced due diligence necessary for those	<input type="checkbox"/> Y	<input type="checkbox"/> N

	categories of customers and transactions that the FI has reason to believe posing a heightened risk of illicit activities at or through the FI? 金融機構是否有針對可合理被認為有高度可能透過其進行違法行為的客戶及交易採行加強盡職調查措施？		
12	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? 金融機構是否執行適當的身分辨別程序，以確認客戶開戶或執行交易的最終受益方？	<input type="checkbox"/> Y	<input type="checkbox"/> N
13	Does the FI have a requirement to collect information regarding its customers' business activities? 金融機構是否要求搜集關於客戶業務活動的資料？	<input type="checkbox"/> Y	<input type="checkbox"/> N
14	Does the FI assess its FI customers' AML policies or practices? 金融機構是否評估其金融同業客戶的反洗錢政策及運作方式？	<input type="checkbox"/> Y	<input type="checkbox"/> N
15	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? 金融機構是否有程序審閱，並在適當情形下更新，與高風險客戶相關的資訊？	<input type="checkbox"/> Y	<input type="checkbox"/> N
16	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? 是否建立每位新客戶的檔案，並記錄在開戶時所蒐集的身分證明文件及 KYC 資訊？	<input type="checkbox"/> Y	<input type="checkbox"/> N
17	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? 是否根據對客戶執行風險評估，以瞭解其正常及預期的交易活動？	<input type="checkbox"/> Y	<input type="checkbox"/> N
III. Name Screening/Transaction Monitoring/ Suspicious Transaction Report		Answer	
		Yes	No
18	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? 金融機構針對須通報予政府機構之交易，是否制定政策或處理規章？	<input type="checkbox"/> Y	<input type="checkbox"/> N
19	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? 金融機構對於某些刻意規避現金交易申報義務之交易，是否有監控程序？	<input type="checkbox"/> Y	<input type="checkbox"/> N
20	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? 金融機構是否針對客戶及交易是否涉及政府或權責機構所公告的名單上的個人、團體或國家進行掃描？	<input type="checkbox"/> Y	<input type="checkbox"/> N
21	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? 金融機構是否制定政策以合理地確保僅會與持有其所在國家營業執照的通匯銀行進行交易活動？	<input type="checkbox"/> Y	<input type="checkbox"/> N
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? 金融機構是否依據 Wolfsberg Transparency Principles 適當發出 MT 202/202COV 及 MT 205/205COV 電文？	<input type="checkbox"/> Y	<input type="checkbox"/> N

23	<p>Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?</p> <p>金融機構對於異常及潛在可疑交易活動(含轉帳、金融工具例如旅行支票、匯票等)是否有監控機制?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N
IV. AML Training		Answer	
		Yes	No
24	<p>Does the FI provide AML training to relevant employees that includes:</p> <ul style="list-style-type: none"> -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. <p>金融機構是否對員工進行包含下列項目的反洗錢教育訓練?</p> <ul style="list-style-type: none"> -應向主管機關申報的交易其辨識及申報內容流程 -與此金融機構產品及服務相關的洗錢實例 -內部反洗錢政策 	<input type="checkbox"/> Y	<input type="checkbox"/> N
25	<p>Does the FI retain records of its training sessions including attendance records and relevant training materials used?</p> <p>金融機構是否保留教育訓練紀錄，包含出席紀錄及相關資料、所用教材?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N
26	<p>Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?</p> <p>金融機構與相關員工溝通新的反洗錢相關法規或相關政策及執行流程?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N
27	<p>Does the FI employ third parties to carry out some of the functions of the FI?</p> <p>金融機構是否將部份反洗錢作業委外處理?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N
28	<p>If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes:</p> <ul style="list-style-type: none"> -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. <p>若第 27 題回覆為 Yes，則是否對該委外第三方進行包含下列項目的反洗錢教育訓練?</p> <ul style="list-style-type: none"> -應向主管機關申報的交易其辨識及申報內容流程 -與此金融機構產品及服務相關的洗錢實例 -內部反洗錢政策 	<input type="checkbox"/> Y	<input type="checkbox"/> N
V. Others Information		Answer	
		Yes	No
29	<p>Is there any banking activity (product, service, transaction etc.) the FI choose not to provide in order to reduce the risk of ML?</p> <p>If the answer is "Yes", please answer question 29(a).</p> <p>金融機構是否對特定活動(產品、服務、交易等)予以限制以控管洗錢風險? 若有，請回答第 29(a)題。</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N
29(a)	<p>If yes, please specify:</p> <p>若有，請說明：</p> <div style="background-color: #cccccc; height: 20px; width: 100%; margin-top: 5px;"></div>		

30	Does your Institution provide any of the following: (a) Payable through accounts (PTA) (b) Anonymous accounts (c) Fictitious accounts	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否提供以下產品與服務: (a) 過渡帳戶 (b) 匿名帳戶 (c) 虛擬帳戶	<input type="checkbox"/> Y	<input type="checkbox"/> N
31	Has your Institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the last five years? If the answer is “Yes”, please answer question 31(a).	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構在近五年內是否因違反反洗錢法規而被裁罰或需負擔刑事責任? 若有，請回答第 31(a)題。		
31(a)	If yes, please specify: 若有，請說明: 		
32	Does the FI rank customers into different risk level classification in accordance with risk-based approach, and have periodical profile review on each customer of different risk levels? If the answer is “Yes”, please answer question 32(a), 32(b) and 32(c). If the answer is “No”, please answer question 32(d).	<input type="checkbox"/> Y	<input type="checkbox"/> N
	金融機構是否依據風險基礎方法，對客戶進行風險等級分類並依不同之風險等級進行定期資料審查？若有，請回答第 32(a)、32(b)及 32(c)題。若無，請回答第 32(d)題。		
32(a)	Please briefly explain how many risk levels are designed in your system. 請簡要說明客戶風險等級。 		
32(b)	Please specify the percentage of each risk level. 請說明各風險等級之客戶分配比例。 		
32(c)	Please specify how often KYC information updated for each customer of each risk level. 請說明各風險等級客戶之定期審查頻率。 		
32(d)	If “No” to Question 32, please elaborate how you assess customers’ risk. 若無，請簡要說明貴機構如何評估客戶風險。 		
33	Does the FI file Suspicious Transactions Reports (STR) or Suspicious Activity Reports (SAR)? If the answer is “Yes”, please answer question 33(a).	<input type="checkbox"/> Y	<input type="checkbox"/> N
	是否有通報可疑交易？若有，請回答第 33(a)題。		
33(a)	If yes, please list the total number of Alerts/SARs/STRs filed in the past 12 months. 若有，請列出過去 12 個月之警示件數及可疑交易通報件數。 		

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Name	
Title	
Department / Division	
E-mail	
Signature	
Date	

Stock Exchanges

Alberta Stock Exchange	Italian Exchange
American Stock Exchange	Jakarta Stock Exchange
Athens Stock Exchange	Jamaica Stock Exchange
Australian Stock Exchange	JSE Securities Exchange, South Africa
Bermuda Stock Exchange	Korea Stock Exchange
Bolsa de Comercio de Buenos Aires	Kuala Lumpur Stock Exchange
Bolsa de Comercio de Santiago	Ljubljana Stock Exchange
Bolsa de Valores de Caracas	London Stock Exchange
Bolsa de Valores de Lima	Malta Stock Exchange
Bolsa de Valores de Rio de Janeiro	NASD
Bolsa de Valores de São Paulo	National Stock Exchange of India, Ltd.
Bolsa Mexicana de Valores	National Stock Exchange of Lithuania
Bolsas y Mercados Españoles	New York Stock Exchange
Boston Stock Exchange	New Zealand Stock Exchange
Bourse de Luxembourg	Osaka Securities Exchange
Bourse de Montreal	Oslo Bors
BSE The Stock Exchange, Mumbai	Philippine Stock Exchange
Bucharest Stock Exchange	Prague Stock Exchange
Budapest Stock Exchange Ltd.	Shanghai Stock Exchange
Chicago Board Options Exchange	Shenzhen Stock Exchange
Chicago Stock Exchange	Singapore Exchange
Colombo Stock Exchange	Stock Exchange of Hongkong
Copenhagen Stock Exchange	Stock Exchange of Tehran
Cyprus Stock Exchange	Stock Exchange of Thailand
Deutsche Börse Ag	Stockholmsbörsen
Euronext Amsterdam	SWX Swiss Exchange
Euronext Belgium	Taiwan Stock Exchange Corp.
Euronext Brussels	Tel Aviv Stock Exchange
Euronext Lisbon	Tokyo Stock Exchange
Euronext Paris	TSX Toronto Stock Exchange
HEX Plc	Vancouver Stock Exchange
Hongkong Exchanges and Clearing	Warsaw Stock Exchange
Irish Stock Exchange	Weiner Börse Ag
Istanbul Stock Exchange	Winnipeg Stock Exchange

