

AML QUESTIONNAIRE - FOR CORRESPONDENT BANKS



Section I – General Information

Name of Credit Institution	FIMBank p.l.c.	
Legal Form¹	Public Limited Company	
Principal Place Of Business	7 th Floor, the Plaza Commercial Centre, Bisazza Street, Sliema, SLM1640 Malta	
Date Established	8.11.1994	
Country of Registration	Malta	Please state registration number (if applicable) C17003
Listed on	Malta Stock Exchange	Please state the exchanges where you are listed (the major exchange is sufficient) and include your listed exchanges and symbols

Section II – Ownership & Management Information (only for use when subject bank is not a public traded entity)

In the space provided below please list the Ownership [Govt/Public/Private] and the Percentage of Holding²

Name	Ownership interest (percentage)	Nature of ownership (direct/ indirect)
Massaleh Investments K.S.C.C	44.07%	Direct
Astrolabe General Trading & Contracting Company	5.82%	Direct
International Finance Corporation	5.78%	Direct
Fouad M. T. Alghanim	5.62%	Direct

Section III – Anti Money Laundering (AML) Controls

Is your good institution supervised by a national authority? Yes No ☒ ☐	Please state the supervisory authority & date/status of Banking Authorisation: Malta Financial Services Authority Bank Licence issued on 15.11.1994	
Is the supervision carried out with special regard to the prevention of money laundering and combating terrorist financing?	Yes No ☒ ☐	
Are there any specific laws or regulations on Money Laundering prevention in your country? Kindly provide a list "Prevention of Money Laundering Act" (Act XIX of 1994, last amended by LN 105 2008) and the "Prevention of Money Laundering and Funding of Terrorism Regulations" (LN 180 of 2008).	Yes No ☒ ☐	
Is money laundering considered as a crime in your legislation?	Yes No ☒ ☐	
Is terrorist financing considered as a crime in your legislation?	Yes No ☒ ☐	
Does your country's regulatory body require all credit institutions to have anti-money laundering and know your customer procedures?	Yes No ☒ ☐	
Do your regulations/directives require the recognition of the true identity of customers and the origin of their funds?	Yes No ☒ ☐	

¹ Please specify the type of entity, for example: a partnership or a company (public or private, etc.)

² For purposes of this question, an "owner" is any person or legal entity that, directly or indirectly, owns, controls or has voting power of 25% or more of any class of securities of your bank – please check cross references

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If so, is your Institution in compliance with AML and KYC rules?	Yes ☒ No ☐
Do you comply with the recommendations of the FATF or the European Union or with equal standards? Please specify.	Yes ☒ No ☐
Do you have written anti-money laundering procedures and policies?	Yes ☒ No ☐
If so, do they include at least:	
• the identification of the true identity, source of funds, economic activities and the nature of anticipated transactional activities of all customers prior to establishing a business relationship?	Yes ☒ No ☐
• the verification of beneficial owners of funds?	Yes ☒ No ☐
• the appointment of a compliance officer / Money Laundering Reporting Officer and if yes, please provide us with the following contact details; a) Compliance Officer / MLRO name: Mr. Marcel Cassar / Mr. Ivan Fsadni b) Designation: First Executive Vice-President, Chief Financial Officer & Company Secretary/ Head of Audit c) Full Address: 7 th Floor, the Plaza Commercial Centre, Bisazza street, Sliema SLM1640, Malta d) E-mail address: lcd@fimbank.com mlro@fimbank.com e) Phone / Fax No: +356 21 322 100 - +356 21 322 122 f) Swift code FIMB MT M3	Yes ☒ No ☐
• staff training in terms of AML, which is carried out on a regular basis?	Yes ☒ No ☐
• an employee training program to educate employees in the ways of preventing money laundering transactions and to assist them in identifying suspicious transactions, which is carried out on a regular basis?	Yes ☒ No ☐
If your answer to the previous question is 'No', do you plan to develop written policies?	Yes ☐ No ☐
Does the AML compliance programme require the approval of your institution's Board or senior committee thereof?	Yes ☒ No ☐
Is your customer identification program designed to obtain and verify information regarding your customers' true identity, source of funds, economic activities and the nature of anticipated transactional activities?	Yes ☒ No ☐
Is your customer identification program designed on a risk approach requiring enhanced due diligence on the appropriate risk level for countries/territories or special customer groups?	Yes ☒ No ☐
Do you have account opening procedures (customer acceptance policy) in place?	Yes ☒ No ☐
In addition to inspections by the government supervisors/regulators, do you have an internal audit function or another independent third party such as an External Auditor, that assesses AML policies and practices on a regular basis. Please specify the name of the External Auditor if such a measure is in place KPMG, Malta.	Yes ☒ No ☐
Is your monitoring program designed to facilitate the identification of suspicious transactional activities?	Yes ☒ No ☐
Does your institution maintain records on customer identification, account files and correspondence for a specific period of time and cooperate with local authorities so as to permit investigation of suspicious activities as well as provide, if necessary, evidence for prosecution of criminal behavior?	Yes ☒ No ☐

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Have you implemented a process aimed at assessing your compliance with international anti-money laundering and anti-terrorist financing policies, regulations, legislation and/ or sanction lists issued by relevant international or regional organisations? Please specify.			Yes ☒ No ☐
Are your policies and directives applicable for all branches and subsidiaries, both in the home country and in locations outside the home country, at least as a minimum standard?			Yes ☒ No ☐
Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices?			Yes ☒ No ☐
Has a USA Patriot Act Certification (as well for Correspondent Banks) been provided by your good institution?	Yes ☒ No ☐	Please state the issuing date and the internet source if available:	
Do you provide any banking services to “shell” banks?	Yes ³ ☐ No ☒	A shell bank is generally defined as an entity that does not maintain a physical presence.	
Has your Institution ever had any regulatory or criminal enforcement actions resulting from violations of anti money laundering laws or regulations			Yes ☐ No ☒

The undersigned, based on his/her best knowledge and belief, certifies the above referenced questions were answered considering the existing internal controls of the subject financial institutions, and further present an accurate representation of the existing state of the institution’s anti-money laundering and anti-terrorist financing internal controls and financial services activities.

COMPLETED BY:	Marcel Cassar	Officer responsible for account/relationship: Thomas Dissen	Secondary contact: Corinne Lanfranco
POSITION:	First Executive Vice President, Chief Financial Officer & Company Secretary	First Vice President & Head of Corporate and Institutional Banking Tel: +356 21 322 100	Telephone number: +356 23 280 210
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Original signed by Mr. Marcel Cassar

³ If yes, please provide details