

Section I - General Information

Name of Credit Institution:	FIMBank p.l.c.	
Legal Form ¹ :	Public Limited Company	
Principal Place Of Business:	Mercury Tower, The Exchange Financial & Business Centre, Elia Zammit Street, St Julian's STJ 3155, Malta	
Date Established:	8.11.1994	
Country of Registration:	Malta	Registration Number: C17003
Please state the exchange where you are listed (the major exchange is sufficient) and include your listed exchange and symbols	Malta Stock Exchange, USD, FIM	

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

The list of shareholders registered with a holding of 5% or more, can be accessed from <http://www.fimbank.com/shareholder-services>

Section III – Anti Money Laundering (AML) Controls

1. Please state the supervisory authority & date/status of Banking Authorisation:	Malta Financial Services Authority Licence issued on 15.11.1994
2. Is your good institution supervised by a national authority?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Is the supervision carried out with special regard to the prevention of money laundering and combating terrorist financing?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
4. Are there any specific laws or regulations on Money Laundering prevention in your country? Kindly provide a list of laws/regulations: • "Prevention of Money Laundering Act" (Act XIX of 1994, last amended by (LN 105 of 2008). • "Prevention of Money Laundering and Funding of Terrorism Regulations" (LN 180 of 2008).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
5. Is money laundering considered as a crime in your legislation?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
6. Is terrorist financing considered as a crime in your legislation?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
7. Does your country's regulatory body require all credit institutions to have anti-money laundering and know your customer procedures?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
8. Do your regulations/directives require the recognition of the true identity of customers and the origin of their funds? If so, is your institution in compliance with AML and KYC rules?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
9. Do you comply with the recommendations of the FATF or the European Union or with equal standards?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

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

10. Do you have written anti-money laundering procedures and policies? If so, do they include at least:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.1 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.2 the verification of beneficial owners of funds?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.3 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: Michael Davis b) Designation: Executive Vice President, Group Chief Compliance Officer c) Full Address: Mercury Tower, The Exchange Financial & Business Centre Elia Zammit Street, St Julian's, STJ 3155, Malta d) E-mail address: compliance@fimbank.com • mlro@fimbank.com e) Phone / Fax No: +356 21 322 100 / +356 21 322 122 f) Swift code: FIMBMTM3	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.4 staff training in terms of AML, which is carried out on a regular basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
10.5 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
11. If your answer to the previous question is 'No', do you plan to develop written policies?	Yes <input type="checkbox"/> No <input type="checkbox"/>
12. Has your institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13. Does the AML compliance programme require the approval of your institution's board or senior committee thereof?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
14. 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
15. Is there a formal risk assessment based on customers, services, products, and jurisdictions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
16. Is the risk assessment updated as and when new products or services are offered?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
17. Are customers and counterparties assessed as high risk subject to enhanced due diligence procedures in the context of KYC and ongoing reviews/monitoring?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
18. Do the AML/CTF Policy and Procedures cover the identification and verification of all UBOs, i.e. natural persons, who own greater than 10% of corporate customers at the time of account opening?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

19. Do the AML/CTF Policy and Procedures cover the identification and verification of all controllers and identification of all directors of corporate customers at the time of account opening?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
20. Do the verification procedures above include the retaining of appropriately certified copies of official identification documentation which includes address verification?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
21. Do you have account opening procedures (customer acceptance policy) in place?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
22. 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?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Please specify the name of the External Auditor if such a measure is in place.	KPMG Malta
23. Is your monitoring program designed to facilitate the identification of suspicious transactional activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
24. 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
25. 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?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
26. Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
27. Where cash transaction reporting is mandatory, does your institution have procedures to identify transactions structured to avoid such obligations?	Fimbank does not deal in cash.
28. Does your institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
29. Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
30. Does your institution adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ³	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
31. 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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
32. Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices ?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

³ The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

33. Does your institution retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
34. Does your institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
35. Does your institution employ third parties to carry out some of the functions of the FI?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
36. If the answer to question 35 is 'Yes', does your institution provide AML training to relevant third parties that includes: <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? 	Yes <input type="checkbox"/> No <input type="checkbox"/>
37. Has a USA Patriot Act Certification (as well for Correspondent Banks) been provided by your good institution? ⁴	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
38. Do you provide any banking services to "shell" banks? ⁵ If 'Yes', please provide details.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
39. Has your institution ever had any regulatory or criminal enforcement actions resulting from violations of anti money laundering laws or regulations?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Officer responsible for account/relationship: Corinne Lanfranco
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Website: www.fimbank.com
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⁴Please state the issuing date and the internet source if available.

⁵A shell bank is generally defined as an entity that does not maintain a physical presence.

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: Michael Davis

Designation: Executive Vice President, Group Chief Compliance Officer

Date: 12th June 2018



Original Signed by Michael Davis