



BANK MELLI IRAN

HAMBURG

Anti-Money Laundering Questionnaire

I. Basics

1. Full legal name	Bank Melli Iran
2. Legal address	Holzbrücke 2 20459 Hamburg Germany
3. Contact address	s.a.
4. Web address	www.bankmelli.de
5. SWIFT address	MELIDEHH
6. Legal status a) publicly held or privately owned b) Are your shares listed, if yes, on c) which stock exchange d) In case your institution is a branch, please indicate the domicile of the parent company e) others	a) 100% Bank Melli Iran, Ferdowsi Avenue, Teheran, Iran b) ./. c) ./. d) s.a. e) ./.
7. Banking license or business registration number	II 2-II20-331
8. Number of branches	./.
9. Name of the regulation body that oversees your financial institution	Bundesanstalt für Finanzdienstleistungsaufsicht
10. Name of External Auditor	C A S I S Heimann Buchholz Espinoza Partnerschaft, Wirtschaftsprüfungsgesellschaft
11. Management structure Do you have any Politically exposed Persons in the management?	No



II. Bank Information

		Yes	No
1	Is the AML compliance programm approved by your board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Do you have a legal and regulatory compliance program that includes a designated officer that is responsible for coordination and overseeing the AML framework?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Have you developed written policies documenting the processes that you have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	In addition to inspections by the government supervisors/regulators, do you have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Do you have a policy prohibiting accounts/relationship 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 checked="" type="checkbox"/>	<input type="checkbox"/>
6	Do you have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Do you have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Do you allow direct use of the correspondent account by third parties to transact business on their own behalf?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Do you provide wire transfer, bank draft and other services to non-established customers of the bank i.e. walk-ins or others who do not maintain accounts? If yes, do you identify them?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	Have you been fined for a breach of any applicable anti-money laundering legislation in the past five years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III. Risk Assessment

		Yes	No
11	Do you have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12	Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that you have reason to believe pose a heightened risk of illicit activities at or through you?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

IV. Know your Customer, Due Diligence and Enhanced Due Diligence

		Yes	No
13	Have you implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14	Do you have a requirement to collect information regarding your customers business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Do you collect information and assess your FI customers' AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Do you have a process to review and, where appropriate, update customer information relating to high risk client informations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Do you have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18	Do you permit to open and keep anonymous accounts?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19	Do you permit to open and keep fictitious accounts? (accounts that are opened by unidentified persons or that are opened to provide transactions without client identification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20	Do you complete a risk-based assessment to understand the normal and expected transactions of your customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>



V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Fund

		Yes	No
21	Do you have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22	Do you have procedures to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23	Do you screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	Do you have policies to reasonably ensure that you only operate with correspondent banks that possess licences to operate in their countries of origin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VI. Transaction Monitoring

		Yes	No
25	Do you have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments such as travellers checks, money order, etc?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VII. AML Training

		Yes	No
26	Do you provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your products and services and internal policies to prevent money laundering?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
27	Do you retain records of your training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28	Do you communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
29	Do you employ third parties to carry out some of your functions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If yes, do you 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 your products and services, internal policies to prevent money laundering?	<input type="checkbox"/>	<input type="checkbox"/>
30	Place for other informations:		

VIII. Anti Bribery

		Yes	No
31	Is a formal anti-bribery programme and a written anti-bribery statement, incl. a zero tolerance principle approved by your board or senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
32	Do you developed written policies documenting the processes to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
33	Do you developed policies covering gifts, entertainment, charitable and political contributions, sponsoring etc.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
34	Do your Human Resources policies take provisions on corruption risk into consideration?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
35	Do you developed policies allowing the reporting of breaches and suspicions (whistle blowing policies)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
36	Do you provide communication on anti-bribery developments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
37	Do you provide anti-corruption risk-based training to relevant employees on bribery and corruption?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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