

Financial Institution Name: KBL European Private Bankers S.A.
Location: Luxembourg

Anti-Money Laundering Questionnaire		
<b>I. General AML Policies, Practices and Procedures:</b>		
	Yes	No
1. Is the AML Compliance program approved by the FI's board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. In addition to the 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>II. Risk Assessment:</b>		
	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence:</b>		
	Yes	No
12. Has the FI 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"/>
13. Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Does the FI assess its FI customer's AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. Does the FI 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"/>
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:</b>		
	Yes	No
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	N/A	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licences to operate in their countries of origin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT205/205COV message formats? <sup>1</sup>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>V. Transaction Monitoring:</b>		
	Yes	No
23. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>1</sup> 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)



VI. AML Training		
	Yes	No
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities.</li> <li>• Examples of different forms of money laundering involving the FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	N/A	
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities.</li> <li>• Examples of different forms of money laundering involving the FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	N/A	

Space for additional information :

(please indicate which question the information is referring to.)

19) No mandatory in Luxembourg legal framework

27) – 28) N/A – No relevant services outsourced

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Signature:		
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