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| *In accordance with internal rules and regulations we are required to assess the policies and procedures you have in place to fight money laundering and terrorist financing. In this context please reply to the questions below.* |

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| **Company Name:** |  |
| **Date of registration:** |  |
| **Registered company number:** |  |
| **Registered address** | *Country, town, address, office, post code* |
| **Business address (if different)** | *Country, town, address, office, post code* |
| **Company website address:** |  |

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| **Name of license:** |  |
| **License number:** |  |
| **Issuing authority:** |  |
| **If you don’t have license, please describe why:** |  |

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| **AML-CTF/ Sanctions & Embargoes Policies Practices and Procedures** |

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| **1. Does the company have an AML-CTF/Sanctions & Embargoes compliance program?** |  |
| **2. Does this program apply to all of the company’s domestic and foreign branches and subsidiaries?** |  |
| **3. a) Is the AML compliance program approved by the company’s board or a senior committee?** |  |
| **b) If yes, how frequently is it updated?** |  |
| **4. a) Does the board / senior committee receive regular management information reporting on AML-CTF/Sanctions & Embargoes matters?** |  |
| **b) If yes, with what frequency?** |  |
| **5. a) Does the company have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?** |  |
| **b) If yes, provide the name and contact details of this person and his/her reporting line.** |  |
| **6. a) Does the company have a formal independent AML-CTF/Sanctions & Embargoes compliance function?** |  |
| **b) Describe the governance and structure of the AML-CTF/Sanctions Embargoes compliance function including the approximate number of employees.** |  |
| **7. Has the company developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?** |  |
| **8. When was the last regulatory exam related to AML-CTF and which government regulatory body conducted the exam?** |  |
| **Describe any pertinent findings and the actions taken to address them.** |  |
| **9. In addition to inspections by the government regulatory body, does the company have an internal audit function or other independent third party that assesses AML-CFT policies and practices on a regular basis?** |  |
| **What is the frequency of the review/ assessment?** |  |
| **b) Have there been any material audit findings relating to AML-CTF/Sanctions & Embargoes?** |  |
| **c) If yes, describe and advise what actions are being taken to address them.** |  |
| **10. Does the company have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates** |  |
| **a) Outline these policies and how these risks are managed (identification, risk classification, validation...).** |  |
| **11. If yes, what categories of customers and transactions are considered to present a heightened risk? -** |  |
| **12. Are there any particular categories of customers that are prohibited?** |  |
| **13. If yes, please give details.** |  |
| **14. Does the company have obligations to identify the beneficial owners of its customers?** |  |
| **15. Does the company have obligations to collect information relating to the customer’s and beneficial owner(s)’ source of wealth and source of funds?** |  |
| **16. Does the company have a requirement to collect information regarding its customers’ business activities?** |  |
| **17. Describe the minimum documentation requirements for new clients and their beneficial owners, including the steps to verify their identity.** |  |
| **18. Does the company have a process to review and, where appropriate, update customer information relating to high risk client information?** |  |
| **a) Does this include an immediate review in the event of trigger events?** |  |
| **b) How frequently is customer due diligence/KYC information updated?** |  |
| **19. Does the company have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information?** |  |
| **20. Does the company complete a risk-based assessment to understand the normal and expected transactions of its customers?** |  |
| **a) Is this assessment updated on a regular basis?** |  |
| **21. Describe the organisation of the KYC structure for on-boarding and review (reporting line, centralized, decentralized ...).** |  |
| **22. Does the company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?** |  |
| **23. Does the company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers?** |  |
| **24. What types of monitoring programmes (automated/ manual) are used to cover potentially suspicious activity?** |  |
| **25. Are these programmes in-house or purchased solutions?** |  |
| **26. At high level, describe the parameters and thresholds of the transaction monitoring system.** |  |
| **27. Does the company have a feedback loop providing a link between transaction monitoring output and KYC / relationship risk management?** |  |
| **28. Does this link also include sanctions screening output?** |  |
| **29. Is the company or any of its subsidiaries, joint-ventures, directors or officers the target of any economic or financial sanctions?** |  |
| **a) If yes, provide details** |  |
| **30. Is the company or any of its subsidiaries or joint-ventures located within or operating from any countries subject to US comprehensive sanctions?** |  |
| **31. Is the company or any of its subsidiaries or joint-ventures engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any countries subject to US comprehensive sanctions or any person or entity which is the target of any Sanctions?** |  |
| **32. If responses to questions 29, 30 or 31 are “Yes”:** |  |
| **The list of subsidiaries or joint ventures concerned by Yes responses must be provided and following questions must be answered distinctly for all entities in relationship with Alfa-Bank (including the company Itself)** |  |
| **a) Please explain and detail what percentages of sales and/or purchases involve each country subject to US comprehensive sanctions or Sanctioned Person.** |  |
| **b) Please explain if there is an intention to expand the scope of the activity.** |  |
| **c) Please confirm that the transactions considered with Alfa-Bank do not involve any countries subject to US comprehensive sanctions or Sanctioned Person directly or indirectly and explain the controls in place to ensure that activity related to any countries subject to US comprehensive sanctions or Sanctioned Person does not pass through Alfa-Bank.** |  |
| **33. Please describe how the company ensures compliance with applicable sanctions / embargoes:** |  |
| **a) Does the company screen customers against lists of persons, entities or countries issued by government/competent authorities?** |  |
| **i) If yes, what is the screening frequency?** |  |
| **ii) Are the screening programs automated or manual?** |  |
| **iii) Are the screening programs in-house or purchased?** |  |
| **If purchased, please give the name of the provider:** |  |
| **34. Which sanctions list(s) do you screen transactions and customers (including beneficial owners) against (UN, US, EU, other)?** |  |

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| Are any of the authorized representatives, directors or business owners (owning 25% or more of the company) politically exposed persons? e.g – are they senior military, government, or political officials, or relatives or associates of such officials?  If yes, please provide detailed information about such persons (if necessary please continue on an additional sheet). | Yes ☐ No ☐  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |