

**Financial Institution Name:** International Bank for Economic Co-operation (IBEC)

**Location:** 11, Masha Poryvaeva Street, Moscow, Russia, GSP-6, 107996

## Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the 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?   | Y <input checked="" type="checkbox"/> | N <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?  | Y <input checked="" type="checkbox"/> | N <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?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 4. In addition to 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?                                       | Y <input checked="" type="checkbox"/> | N <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> ) | Y <input checked="" type="checkbox"/> | N <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?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?   | Y <input type="checkbox"/>            | N <input checked="" type="checkbox"/> |
| 8. Does the FI have record retention procedures that comply with applicable law?   | Y <input checked="" type="checkbox"/> | N <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?  | Y <input type="checkbox"/>            | N <input checked="" 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?  | Y <input checked="" type="checkbox"/> | N <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?                    | Y <input checked="" type="checkbox"/> | N <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?   | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 13. Does the FI have a requirement to collect information regarding its customers' business activities?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 14. Does the FI assess its FI customers' AML policies or practices?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?   | Y <input checked="" type="checkbox"/> | N <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?   | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |



| <b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>   | <u>Yes</u>                            | <u>No</u>                             |
|---|---------------------------------------|---------------------------------------|
| 18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?   | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?   | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| <b>V. Transaction Monitoring</b>  | <u>Yes</u>                            | <u>No</u>                             |
| 22. 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?   | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| <b>VI. AML Training</b>   | <u>Yes</u>                            | <u>No</u>                             |
| 23. 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>  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 24. Does the FI retain records of its training sessions including attendance records and relevant training materials used?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?  | Y <input checked="" type="checkbox"/> | N <input type="checkbox"/>            |
| 26. Does the FI employ third parties to carry out some of the functions of the FI?  | Y <input type="checkbox"/>            | N <input checked="" type="checkbox"/> |
| 27. If the answer to question 26 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> | Y <input type="checkbox"/>            | N <input type="checkbox"/>            |

Space for additional information:

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

About question #7: The IBEC doesn't work with natural persons.

About question #9: The IBEC doesn't have subsidiaries.

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| <b>Name: Golyshev Vladimir</b>   |
| <b>Title: Compliance officer</b>   |
| <b>Signature:</b>  |
| <b>Date: «03» october 2017</b>   |