



ANTI MONEY LAUNDERING QUESTIONNAIRE

(name of the bank)

Confidential	Confidential	Confidential	Confidential	Confidential	Confidential	Confidential	Confidential	
		QUESTIONNAIRE						
		Prevention of money laundering						
		Fight against terrorism financing						
		Fight against weapons of mass destruction						
							YES ⁽¹⁾	NO ⁽¹⁾
1 Identification of clients and other business relations								
1.1 Has your establishment put in place a clients' identification procedure and other relationships in line with the FATF recommendations in force?								
If the answer is yes, respond to the following questions								
1.2. Does your client identification and the identification of other business relationships require obtaining								
* for natural persons								
a) presentation of a valid official identity document which includes a photograph of which you keep a copy (national identity card, passport,...) ?								
b) presentation of a document to justify residency?								
c) Where necessary indicate the actual beneficiary (2) on behalf of whom the the transactions are made								



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* For corporate clients	YES	NO
a) Presentation of a certificate of registration at the trade register and real estate credit		
or an original or authenticated copy of any other document of equal value?		
b) or a document justifying the address of the headquarters of the corporate body?		
c) determination of the actual beneficiary ⁽²⁾		
* for the legal representative, agent or other intermediary of individuals and corporate bodies		
la) presentation of a valid official identity document that includes a photograph?		
b) presentation of a document proving permanent legal residence?		
* for natural persons and corporate clients		
Proof of identity and permanent legal residence of guarantors within the framework of financing?		
1.3. Does your identification procedure require your identifying		
Trustees and beneficiaries of of trust funds (trust, trust company, anstalt,...) ?		
1.4. Does your procedure require the identification of politically exposed persons?		
1.5. Does your procedure require making statements to CENTIF or another Financial Intelligence Unit when it is difficult to identify the actual beneficiary?		
1.6. Does your procedure require a periodic updating of the client's data?		
1.7. Does your procedure require harmonization:	YES	NO



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a) of your client files and lists relating to freeze of assets sanctions?		
b) files of legal representatives and the lists of frozen assets?		
II Knowledge of clients		
2.1. Does your procedure require that you collect all necessary information to define the the client's profile: identity, activtiies, income or turn over, asset, balance sheets?		
2.2. Does your procedure provide for a system of input validation?		
2.3. Does your procedure prohibit the recommendation of anonymous placements?		
2.4. Does your procedure prohibit establishing relationships with shell banks?		
2.5. Does your procedure require that you ask your corresponding banks not to maintain relationships with shell banks?		
III Vigilance in the processing of transactions		
3.4. Does your procedure demand checks on operations by sampling or with a threshold?		
3.5. Does your procedure provide for special scrutiny for some complex transactions that do not have an economic reason or lawful purpose?		



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III Vigilance in the processing of transactions (continued)	YES	NO
3.6. Does your procedure provide for more vigilance in respect of international operations?		
3.7. Does your procedure require the checking of cheques?		
3.8. Does your procedure require the checking of transfers in particular the originator's transfer data: name, address, account number		
3.9. Does your procedure require enhanced vigilance measures on transactions with countries quoted by FATF as being deficient in strategies relating anti money laundering and terrorism financing?		
3.10. Does your procedure require filtering international transactions with a view to detecting any names that may be on lists relating to freeze of assets sanctions?		
3.10. Does your procedure require the filtering of domestic operations with a view to detecting names that may be on lists relating to freeze of assets sanctions?		
IV Obligation to record and report to the FIU ⁽³⁾ ?		
4.1. Does your procedure require subjecting certain transactions to special scrutiny and recording the results in a Register?		
IV Obligation to record and report to the FIU (3) (continue)	YES	NO
4.2. Does your procedure reporting that you report to the financial intelligence unit (CENTIF ⁽⁴⁾ or other FIU) :		



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a) suspicion of money laundering?		
b) suspicion of terrorism financing?		
c) suspicion of the financing of the proliferation of weapons of mass destruction?		
d) difficulties making it impossible to determine the actual beneficiaries of your clients?		
e) difficulties making it impossible to determine the actual originators of transactions over which you are making special investigations?		
V Staff training	YES	NO
Have staff of your establishment received training on anti money laundering terrorism financing and the proliferation of weapons of mass destruction?		
5.2. Does your procedure require regular training on these topics?		
5.3. Does your procedure mention the obligations of confidentiality attached to data relating to anti money laundering and terrorism financing?		
VI Preservation of documents	YES	NO
6.1. Does your procedure require the preservation of documents relating to the identity of your clients for 10 years with effect from the date of the termination of the business relationship?		



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6.2. Does your procedure require your preserving supporting documents for 10 years with effect from the date of the transactions?		
<p>(1) <i>Put a cross in the box corresponding to your answer</i></p>		
<p>(2) <i>Actual beneficiary = natural person who ultimately controls a legal structure or benefits from transactions made</i></p>		
<p>(3) <i>FIU = Financial Intelligence Units, CENTIF in UEMOA countries</i></p>		
<p>(4) <i>CENTIF = Cellule Nationale de Traitement des Informations Financières</i></p>		

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Certificate:

I confirm that I am authorized to complete this document and that, to my knowledge, the above information is up to date and faithfully the anti-money laundering policies of our institution.

Name :

Signature:

Title :

Date :

Stamp

(P.S. Please note that EBID will not be able to process the proposed transaction or commercial relationship if this form has not been duly completed, signed and sealed, or if incomplete information is provided).