



Reviewed 5th September 2017

**ANTI MONEY LAUNDERING & COMBATING FINANCING OF TERRORISM
COMPLIANCE QUESTIONNAIRE**

PART I-General Information of Financial Institution	
1	Registered name: Persia International Bank Plc
2	Registered address: 6, Lothbury, London, EC2R 7HH
3	Registration /License No.: 208020 Issuing Date: 1st December 2001 Issuing authority: Financial Services Authority
4	Establishment date: 16th May 2001
5	Head Office physical address (if different from the above):
6	Contact details: Name: Mr. Graham Dorkins Title: Compliance Manager & Money Laundering Reporting Officer Address: 6, Lothbury, London, EC2R 7HH Tel: +44-207-214-7260 Fax: +44-207-606-2020 e-mail: g.dorkins@persiabank.co.uk
7	SWIFT: PIBPGB2L
8	Website: www.persiabank.co.uk
9	GIIN No.: 076DQA.99999.SL.826
10	Number of employees: 32
11	Number of branches: One (Domestic branches: NIL Foreign branches: One)
12	Number of subsidiaries: NIL
13	Subsidiaries' information: <u>Number 13 - Not applicable, since we do not have any subsidiaries</u> Nationality (Location of foundation): Contact information : <ul style="list-style-type: none">▪ Name▪ Title▪ Phone▪ Fax▪ E-mail address CEO Information: <ul style="list-style-type: none">▪ Name▪ Phone▪ Date of Birth



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	Principal Business Activity:
	Regulatory Authority responsible for supervision of your subsidiary: Name & address of external auditors:
14	Local regulator/supervisory authority: Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA)
15	AML/CFT authority (i.e. Principal local regulator and supervisory board with regard to AML/CTF Compliance programs: Financial Conduct Authority (FCA) (for AML/CTF and other conduct issues)
16	Activities type: Trade Finance, Commercial and Syndicated Loans and Correspondent Banking
17	Key geographic areas of activity where your Bank is actively promoting its products: UK, Iran & Dubai
18	Has your company merged with another firm? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
19	Has your company's name changed during the past 5 years? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, please provide details.
20	External Auditor's name & address: Mazars LLP, Tower Bridge House, St Katharine's Way, London E1W 1DD
21	Is your Bank a branch or subsidiary of a parent financial institution? No
22	If your answer to the question above is yes, please specify the relationship type: <input type="checkbox"/> Branch <input type="checkbox"/> Subsidiary
23	Parent financial institution details: <u>(we are the parent financial institution – details on the first page)</u> -Name of parent company: -Registered address: -Physical address: -SWIFT/Telex: -Website: -Banking License: -Principal local regulator and AML/CFT competent authority: -Is your parent company listed on any stock exchange: -If yes, on which stock exchange are the shares listed and what the symbol is?



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PART II- Ownership and Management Information	
1	Is your institution listed on any stock exchange? No
2	If your answer to the question above is yes, please indicate the name of stock exchange and its symbol: Not Applicable
3	<p>If your answer to the Part II, item 1 is no, please list full names of shareholders who directly or indirectly own, control or have 5% or more of the shares or voting power of your institution.</p> <p>Full name _____ % of ownership share</p> <p>Bank Mellat 60% Bank Tejarat 40%</p>
4	Have there been any significant changes in the ownership (exceeding 5%) over the last five years? No
5	<p>If your answer to the question above is yes, please provide details:</p> <p>Not Applicable</p>
6	<p>Please provide information on the current ultimate beneficial owner(s) of your institution? (The ultimate beneficial owner means the person(s), who is entitled to enjoy the economic rights stemming from the ownership, although the ownership has been registered in the name of someone else (the legal owner), who holds the object in his own name but on behalf of the beneficial owner)</p> <p>(1) Bank Mellat Tehran 60% <i>(Bank Mellat's 10% or more Shareholder Structure)</i></p> <ul style="list-style-type: none">• IRI (Islamic Republic of Iran) Government 19.66%• Provincial Investment Companies (Edalat Stock) 30% *** <p>(2) Bank Tejarat Tehran 40% <i>(Bank Tejarat's 10% or more Shareholder Structure)</i></p> <ul style="list-style-type: none">• Government of Islamic Republic of Iran 19.48%• Provincial Edalat (Justice) Stock Brokerage Companies 40% *** <p>*** No individual or company holds more than 10% shares</p>
7	<p>Please list the names and positions of the Board of Directors (BOD) members and the Chief Executive Officer (CEO); if your institution is a subsidiary or branch, please also specify the name of the Chief executive Officer/General Manager.</p> <p>Full Name _____ Nationality _____ Position _____</p>



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	<p>Mr. F. Shahmir Title (Position): Independent Non-Executive Director and Chairman (Designate) Nationality: British</p> <p>Dr. Hadi Akhlaghi Feizasr Title (Position): Non-Executive Director and Vice Chairman Nationality: Iranian</p> <p>Mr. Mohammad Ebrahim Moghaddam Noudehi Title (position): Non-Executive Director and Deputy Chairman Nationality: Iranian</p> <p>Mr. Mohammad Reza Meskarian Title (position): Chief Executive Officer Nationality: Iranian</p> <p>Mr. Mohammad Ali Nasrollahi Malek Title: Chief Financial Officer Nationality: Iranian</p> <p>Mr. Rassoul Ajdari Title: Chief Operating Officer Nationality: Iranian</p> <p>Mr. P. J. Quinn Title: Independent Non-Executive Director Nationality: British</p>				
8	Are there any Politically Exposed Persons (PEPs) associated with your institution, as shareholders, members of the board or senior managers of your institution? Yes				
9	<p>If your answer to the question above is yes, please mention full names and details of PEPs involved.</p> <table border="1"><thead><tr><th><u>Full name</u></th><th><u>Type of activities or political involvement</u></th></tr></thead><tbody><tr><td colspan="2">All our directors as listed in field no. 7 (with the exception of Mr. F. Shahmir and Mr. P. J. Quinn) are classified by KYC C6 as being Level 3 PEPs owing to the fact that our Shareholder Banks are viewed as being state owned.</td></tr></tbody></table>	<u>Full name</u>	<u>Type of activities or political involvement</u>	All our directors as listed in field no. 7 (with the exception of Mr. F. Shahmir and Mr. P. J. Quinn) are classified by KYC C6 as being Level 3 PEPs owing to the fact that our Shareholder Banks are viewed as being state owned.	
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Part III- Correspondent Banking Relationships	
1	Does your Bank offer correspondent accounts to other domestic or foreign Banks? Yes
2	What Banks are your major correspondents and counterparts? <u>Name</u> <u>Address & country of domicile</u> At present we are not prepared to divulge
3	Does your Bank offer correspondent accounts to other foreign Banks which are located in high risk jurisdictions? If yes, please list the names, addresses and primary country of domicile. Iran At present we are not prepared to divulge
4	Does your Bank have a policy to reasonably ensure that it only deals with correspondent banks which have license to operate in their respective country of origin? Yes
5	(a) Does your Bank have a policy, which obtain sufficient information to gain an understanding of your correspondents' business, reputation and regulatory history? (b) Do you assess your correspondents' AML polices & practices? Yes to both
6	Does your Bank offer "payable through account" or any other product allowing transaction through Nostro and Vostro accounts? (<i>Payable through accounts are type of correspondent banks accounts that are used directly by third parties to transact business on their own behalf</i>) No
7	Has your Bank established procedures regarding ongoing monitoring of activities conducted through correspondent accounts and business relationship? Yes
8	Does your Bank provide services to: 1) Shell Banks (<i>a shell bank is defined as a bank incorporated in a jurisdiction in which has no physical presence and which is unaffiliated with a regulated financial group</i>) No 2) Offshore banking units? No 3) Political and/or public figures? No 4) Other institutions outside of your country? Yes 5) Internet Banking? No 6) Unregulated Money Service Bureaus? No



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	<p>7) Internet gambling companies? No</p> <p>8) Nested Accounts? No</p> <p><i>(For any questions answered “Yes”, please state below whether there are policies and procedures to mitigate potential risks associate with these higher risk customer types and explain how you mitigate these risks).</i></p> <p>We do have policy and procedure to mitigate potential risks associated with the high risk customers. These is done by risk based approach.</p>
9	<p>Does your Bank have policies to reasonably ensure that your correspondent banks will not conduct transactions on behalf of shell banks? Yes</p>
10	<p>Does your Bank provide nested correspondent banking? (e.g. downstream correspondent banking service) No</p> <p>If “Yes” state below which type of financial institutions it acts for:</p>

<p>Part IV-Anti Money–Laundering & Combating Financing of Terrorism Regulations, policies and procedures</p>	
1	<p>Has your country (or the country of registration, if different) established laws to prevent and criminalize money-laundering and terrorist financing? Yes</p> <p>Please provide name of the government agency responsible for applying AML enforcement action. Financial Conduct Authority (FCA) (for AML/CTF and other conduct issues)</p> <p>Please list the names of the relevant laws. The Money Laundering Terrorist Financing & Transfer of funds (information on the payer) Regulation 2017</p> <p>Are there effective and dissuasive sanctions available to deal with natural and legal persons that fail to comply with AML/CFT requirements? Yes</p>
2	<p>Is your Bank subject to and fully compliant with such laws? Yes</p>
3	<p>Are your Bank’s subsidiaries, if any, subject to and fully compliant with such laws? Not Applicable since we do not have any subsidiaries.</p> <p>If no, to which countries’ AML/CFT laws are they subject to and compliant with?</p>
4	<p>Do the laws and regulations in your country prohibit your Bank from opening anonymous accounts? Yes</p>



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5	Does your Bank adhere to FATF, Basel Committee and Wolfsberg Group AML/CFT standards and recommendations? Yes										
6	<p>Have you appointed a designated officer/unit that is responsible for coordinating and overseeing the AML Framework? If yes, please provide the following details of responsible officer(s):</p> <table border="1" data-bbox="225 533 1441 790"> <thead> <tr> <th data-bbox="225 533 432 566">Name</th> <th data-bbox="432 533 651 566">Title</th> <th data-bbox="651 533 1075 566">Email</th> <th data-bbox="1075 533 1259 566">Tel</th> <th data-bbox="1259 533 1441 566">Fax</th> </tr> </thead> <tbody> <tr> <td data-bbox="225 566 432 790">Mr. Graham Dorkins</td> <td data-bbox="432 566 651 790">Compliance Manager & Money Laundering Reporting Officer</td> <td data-bbox="651 566 1075 790">g.dorkins@persiabank.co.uk</td> <td data-bbox="1075 566 1259 790">+44-207-214-7260</td> <td data-bbox="1259 566 1441 790">+44-207-606-2020</td> </tr> </tbody> </table>	Name	Title	Email	Tel	Fax	Mr. Graham Dorkins	Compliance Manager & Money Laundering Reporting Officer	g.dorkins@persiabank.co.uk	+44-207-214-7260	+44-207-606-2020
Name	Title	Email	Tel	Fax							
Mr. Graham Dorkins	Compliance Manager & Money Laundering Reporting Officer	g.dorkins@persiabank.co.uk	+44-207-214-7260	+44-207-606-2020							
7	Does your Bank have an AML/CFT compliance program approved by your Board of Directors or a designated committee? <u>If yes, Please provide a copy of applied policies.</u> Yes										
8	How often do you review and update your AML/CFT policies? Answer: As and when any changes are applicable What was the last date of your review? Answer: 23rd June 2017										
9	Does your Bank have AML/CFT policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions? Yes										
10	<p>If your answer to the question No. 9 is yes, please indicate whether your AML/CFT policies and procedures include the following topics: <i>(please answer following questions just with yes or no)</i></p> <ul style="list-style-type: none"> - Risk Based Assessment of customers and their transactions? - Enhanced level of due diligence on customers identified as having a higher risk profile? - Provide indicators to identify suspicious transactions? - Procedures for detection and reporting of suspicious transactions? - Ensuring that the financial institution only enters into relationships with institutions that possess licenses to operate in their countries of origin? - Reviewing the AML/CFT controls of institutions applying for correspondent banking services before opening an account for them? - Prohibiting accounts/relationships with shell banks? - Governing relationships with Politically Exposed Persons (PEPs)? - Providing regular AML/CFT training to relevant staff? <p style="text-align: center;">“Yes” to all above”</p>										
11	Are your Bank’s policies, procedures and practices being applied to all branches and subsidiaries of your institution both in the name of home country and in locations outside of that jurisdiction? Yes, plus our Dubai office policy includes laws governing in UAE										



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12	<p>Does your Bank have an internal audit and/or compliance function to test the adequacy of AML/CFT policies and procedures? Yes</p> <p>Please specify the date of latest check? March 2015</p>
13	<p>Is your Bank's AML/CFT policies and procedures regularly checked by an Independent auditors?</p> <p>Yes</p> <p>Please specify the name of external auditor and the date of latest check. Name of external auditor: Grant Thornton LLP Date of last check: March 2015</p>
14	<p>Do you use external vendors for customer and payment screening activities?</p> <p>Yes</p>
15	<p>If your answer to the question No. 14 is yes, please name the software and mention what controls you use to ensure compliance with AML/CTF and sanctions requirements?</p> <p>C6 (https://www.c6-intelligence.com/)</p>
Part V- Know your customer (KYC), Customer Due Diligence (CDD)	
1	<p>Does your institution employ a customer identification program or a procedure that is designated to obtain and verify information regarding your customers' true identity, source of wealth, economic activity and the nature of anticipated transactional activity? Yes</p> <p>Please provide your record retention periods for customer records, transaction records, external reporting and staff training, and confirm that this is in line with your country's applicable law. Minimum 5 years</p>
2	<p>Does your institution identify the ultimate beneficial owners? Yes</p>
3	<p>Please briefly describe your procedures for identification of ultimate beneficial owners, verification of source of funds as well as wealth and understanding the expected activity of your customers. (The ultimate beneficial owner of the customer means the person(s), who is entitled to enjoy the economic rights stemming from the ownership, although the ownership has been registered in the name of someone else (the legal owner), who holds the object in his own name but on behalf of the beneficial owner)</p> <p>Ultimate beneficiary owners, source of funds as well as wealth are identified from the information provided by our customers on their account opening forms as well as face to face interview conducted prior to onboarding them. If they are UK based customers, ultimate beneficial owners are further verified from UK Company House website. Customer's account activity is ascertained from the account monitoring after onboarding the customer.</p>



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4	Does your Bank monitor and review customer information regularly? Yes
5	Does your Bank take steps to understand the normal and expected transactions of its customers based on its profile/line of business? Yes
6	Does your Bank employ third parties to carry out some of the elements of the customer identification program? No
7	Does your Bank provide services to one-off customers? Yes If yes, how does your institution identify these customers? Request the customer's ID documents Request the customers address with proof of same in substantiation Ascertain the proof of funds Conduct checks against the customer and the recipient using C6 Intelligence Copies of all the supporting documentation are retained.
8	Does your Bank undertake Customer Due Diligence (CDD) measures when carrying out occasional transactions of significant amounts? Yes If yes, please indicate what these measures comprise? Same as indicated in No. 7 above, plus we fully ascertain the back ground of the transaction.
Part VI - Transaction monitoring, risk assessment and suspicious reporting	
1	Does your Bank have a monitoring program for suspicious or unusual activity that covers funds transfer and monetary instruments (such as traveler cheques, money orders, etc)? Has your institution ensured that the secrecy law of your country/institution does not inhibit implementation of STR requirements? Yes
2	Does your Bank employ special software to support its monitoring program for suspicious or unusual activity? We are in process of implementing special software.
3	Has your Bank established any procedure regarding on-going monitoring of activities conducted through customer accounts? Yes
4	Does your Bank screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/competent authorities? Yes If yes, please mention if the screening is automated or manual. Both Please provide the sanctions list you check the clients against? OFAC, UN, EU, UK.
5	Does your Bank employ third parties to carry out screening and/or monitoring activities? No



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6	<p>A- Does your Bank provide a risk assessment of its customers' base and their transactions? If yes, please elaborate on your risk model. Yes. All high risk based Customers and their transaction are regularly monitored and thoroughly reviewed.</p> <p>B- Does your institution identify the source of funds in transactions being made to Persia International Bank Plc? Not applicable to us.</p>
7	<p>Does your Bank have monitoring procedures for reporting large cash transactions that are above a designated threshold? Yes</p> <p>What is the threshold? €10,000</p> <p>Which authority the transaction is reported to? Not required to report to any authority. However, these are reported to our Money Laundering Reporting Officer</p>
8	<p>Does your Bank have policy or practice for the identification and reporting of transactions that are required to be reported to the authorities? Yes</p>
9	<p>Does your Bank have the required system in place to ensure its electronic banking (and wire transfers) are not abused for the purpose of money laundering and financing of terrorism? Yes</p>
10	<p>Does your Bank have policies and procedures in place to address risks associated with non-face to face business relationships and transactions? Yes</p>
Part VII – General Questions	
1	<p>Is your Bank permitted by local regulations to share customer identification data with correspondents should they request this? Yes</p> <p>If so would you be willing to share this if requested by us in the event of legitimate need arising? Only if the purpose for sharing and organisation requesting same fall within the criteria permitted under the Data Protection Act 1998</p>
2	<p>In the past five years, has any action been brought against your institution resulting from violations of laws or regulations concerning money laundering or terrorist financing? No</p> <p>If yes, please provide details.</p>
3	<p>From your knowledge has your Bank been subject to any investigation, indictment, or criminal action relating to terrorist financing in the past five years. No</p> <p>If yes please explain nature of same below:</p>



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Please make sure the following documents are attached:

(The below listed documents will be provided upon request)

- Banking license of your institution and Parent company (if applicable);
- Evidence of any name changes of your institution/parent company (if applicable) covering the previous 10 years;
- Top level management structure and full name and position of your institution's/parent company's directors and chief executive officer/s;
- Your Shareholder /Ultimate Beneficiary Structure
- AML/CTF Compliance program (*with reference to question no. IV 7*)
- Latest Annual Report
- Relevant information

I, the undersigned, confirm the validity and accuracy of the information given above.

Name: Mr. Graham Dorkins

Title: Compliance Manager & Money Laundering
Reporting Officer

Signature:

Date: **Information as on 5th September 2017**

Tel/Fax: : **+44-207-214-7260**

E-mail: g.dorkins@persiabank.co.uk