



Reviewed on 09/05/19

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

<b>PART I-General Information of Financial Institution</b>	
1	Registered name: <b>Persia International Bank Plc</b>
2	Registered address: <b>6, Lothbury, London, EC2R 7HH</b>
3	Registration /License No.: <b>208020</b> Issuing Date: <b>1<sup>st</sup> December 2001</b> Issuing authority: <b>Financial Services Authority</b>
4	Establishment date: <b>16<sup>th</sup> May 2001</b>
5	Head Office physical address (if different from the above):
6	Contact details: Name: <b>Mr. Graham Dorkins</b> Title: <b>Head of Compliance &amp; Money Laundering Reporting Officer</b> Address: <b>6, Lothbury, London, EC2R 7HH</b> Tel: <b>+44-207-214-7260</b> Fax: <b>+44-207-606-2020</b> e-mail: <b>g.dorkins@persiabank.co.uk</b>
7	SWIFT: <b>PIBPGB2L</b>
8	Website: <b>www.persiabank.co.uk</b>
9	GIIN No.: <b>076DQA.99999.SL.826</b>
10	Number of employees: <b>32</b>
11	Number of branches: <b>One</b> (Domestic branches: <b>NIL</b> Foreign branches: <b>One</b> )
12	Number of subsidiaries: <b>NIL</b>
13	<b>Subsidiaries' information: <u>Number 13 - Not applicable, since we do not have any subsidiaries</u></b>  Nationality (Location of foundation):  Contact information : ▪ Name ▪ Title ▪ Phone ▪ Fax ▪ E-mail address CEO Information: ▪ 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: <b>Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA)</b>
15	AML/CFT authority (i.e. Principal local regulator and supervisory board with regard to AML/CTF Compliance programs): <b>Financial Conduct Authority (FCA) (for AML/CTF and other conduct issues)</b>
16	Activities type: <b>Trade Finance, Commercial and Syndicated Loans and Correspondent Banking</b>
17	Key geographic areas of activity where your Bank is actively promoting its products: <b>UK, Iran &amp; Dubai</b>
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: <b>MHA MacIntyre Hudson, New Bridge Street House, 30-34 New Bridge Street, London, EC4V 6BJ</b>
21	Is your Bank a branch or subsidiary of a parent financial institution? <b>No</b>
22	If your answer to the question above is yes, please specify the relationship type: <input type="checkbox"/> Branch <input type="checkbox"/> Subsidiary
23	<b>Parent financial institution details:</b> <u><a href="#">(we are the parent financial institution – details on the first page)</a></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 it's Logo?



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<b>PART II- Ownership and Management Information</b>																												
1	Is your institution listed on any stock exchange? <b>No</b>																											
2	If your answer to the question above is yes, please indicate the name of stock exchange and its Logo: <b>Not Applicable</b>																											
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 <span style="float: right;">% of ownership share</span></p> <p><b>Bank Mellat 60%</b>  <b>Bank Tejarat 40%</b></p>																											
4	Have there been any significant changes in the ownership (exceeding 5%) over the last five years? <b>No</b>																											
5	<p>If your answer to the question above is yes, please provide details:</p> <p><b>Not Applicable</b></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 are 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 style="text-align: center;"><b>Bank Mellat</b></p> <p style="text-align: center;"><b>Shareholders Composition more than 3% as of 30.04.2018</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>No.</th> <th>Shareholders</th> <th>Stake (%)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Government of I.R. of Iran</td> <td>17.00</td> </tr> <tr> <td>2</td> <td>Mellat Bank Staff Future Fund</td> <td>6.45</td> </tr> <tr> <td>3</td> <td>Saba Ta'min Investment Company</td> <td>4.22</td> </tr> <tr> <td>4</td> <td>Mellat financial Group company</td> <td>3.92</td> </tr> <tr> <td>5</td> <td>Social security organization</td> <td>3.81</td> </tr> <tr> <td>6</td> <td>Tehran province Investment Company</td> <td>3.05</td> </tr> <tr> <td>7</td> <td>Other Shareholders Possessing Less Than Three Percent of Bank's Shares</td> <td>61.55</td> </tr> <tr> <td>#</td> <td style="text-align: center;"><b>Total</b></td> <td>100</td> </tr> </tbody> </table>	No.	Shareholders	Stake (%)	1	Government of I.R. of Iran	17.00	2	Mellat Bank Staff Future Fund	6.45	3	Saba Ta'min Investment Company	4.22	4	Mellat financial Group company	3.92	5	Social security organization	3.81	6	Tehran province Investment Company	3.05	7	Other Shareholders Possessing Less Than Three Percent of Bank's Shares	61.55	#	<b>Total</b>	100
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**Bank Tejarat Shareholders**

**List of Shareholders Composition on March 19, 2016**

Row	Name of Tejarat Bank's Shareholders	Number of Shares	Percentage
1	Provincial Edalat Stock investment companies (30 companies)	18,279,999,697	40.00
2	Government of Islamic Republic of Iran	7,769,000,000	17.00
3	Saba Tamin Investment Co. (Public Joint Stock)	3,493,548,396	7.64
4	Privatization Organization – By Proxy (Preferential Shares of Personnel)	2,284,162,116	5.00
5	Tadarokat Karamad Pouya Abrisham Trading Co.	1,691,441,812	3.70
6	South Mines Development Co.	1,537,445,253	3.36
7	Mehr 78 Support Services Co. (Ltd.)	1,064,506,401	2.33
8	National Investment Company of Iran (Public Joint Stock)	1,039,272,097	2.27
9	Macro International Services Company	683,718,323	1.50
10	Iran Health Insurance Organization	516,485,606	1.13
	Total Shareholder having more than 1% share	38,359,579,701	83.93
	Other Legal Entities	4,466,087,072	9.77
	Natural Person (47,128 shareholders)	2,874,333,227	6.29
	<b>Total</b>	<b>45,700,000,000</b>	<b>100.00</b>

7 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.

Full Name	Nationality	Position
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**Mr. F. Shahmir**  
**Title (Position): Independent Non-Executive Director and Chairman**  
**Nationality: British**

**Mr. Mohammad Bigdeli**  
**Title (Position): Non-Executive Director and Vice Chairman**  
**Nationality: Iranian**

**Mr. Reza Dolatabadi**  
**Title (position): Non-Executive Director and Deputy Chairman**  
**Nationality: Iranian**

**Mr. David Blackmore,**  
**Title (position): Independent Non-Executive Director**  
**Nationality: British**



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	<p><b>Mr. Mohammad Ali Nasrollahi Malek</b> <b>Title: Acting Chief Executive Officer &amp; Chief Financial Officer</b> <b>Nationality: Iranian</b></p> <p><b>Mr. Rassoul Ajdari</b> <b>Title: Chief Operating Officer</b> <b>Nationality: Iranian</b></p> <p><b>Mr. Aziz Akhondi Asl</b> <b>Title: Non-Executive Director</b> <b>Nationality: Iranian</b></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? <b>Yes</b>				
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><b>Mr. Mohammad Bigdeli</b> <b>Mr. Reza Dolatabadi</b> <b>Mr. Mohammad Ali Nasrollahi Malek</b> <b>Mr. Rassoul Ajdari</b> <b>Mr. Aziz Akhondi Asl</b></td><td></td></tr></tbody></table> <p><b>Our above mentioned 3 directors are classified by KYC C6 as being Level 2 PEPs owing to the fact that our Shareholder Banks are viewed as being state owned.</b></p>	<u>Full name</u>	<u>Type of activities or political involvement</u>	<b>Mr. Mohammad Bigdeli</b> <b>Mr. Reza Dolatabadi</b> <b>Mr. Mohammad Ali Nasrollahi Malek</b> <b>Mr. Rassoul Ajdari</b> <b>Mr. Aziz Akhondi Asl</b>	
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<b>Part III- Correspondent Banking Relationships</b>					
1	Does your financial institution offer correspondent accounts to other domestic or foreign financial institutions? <b>Yes</b>				
2	<p>What institutions are your major correspondents and counterparts?</p> <table border="1"><thead><tr><th><u>Name</u></th><th><u>Address &amp; country of domicile</u></th></tr></thead><tbody><tr><td colspan="2"><b>At present we are not prepared to divulge</b></td></tr></tbody></table>	<u>Name</u>	<u>Address &amp; country of domicile</u>	<b>At present we are not prepared to divulge</b>	
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<b>At present we are not prepared to divulge</b>					
3	<p>Does your financial institution offer correspondent accounts to other foreign financial institutions which are located in high risk jurisdictions? If yes, please list the names, addresses and primary country of domicile.</p> <p><b>Iran</b></p>				



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	<b>At present we are not prepared to divulge</b>
4	Does your institution have a policy to reasonably ensure that it only deals with correspondent banks which have license to operate in their respective country of origin? <b>Yes</b>
5	Does your institution, as a policy, obtain sufficient information to gain an understanding of your correspondents' business, reputation and regulatory history? <b>Yes</b>
6	Does your institution offer "payable through accounts" 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> ) <b>No</b>
7	Has your institution established procedures regarding ongoing monitoring of activities conducted through correspondent accounts? <b>Yes</b>
8	Does your institution 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> ) <b>No</b>  2) Offshore banking units? <b>No</b>  3) Political and/or public figures? <b>No</b>
9	Does your institution have policies to reasonably ensure that your correspondent banks will not conduct transactions on behalf of shell banks? <b>Yes</b>
10	Does your institution provide nested correspondent banking (e.g. downstream correspondent banking service) <b>No</b>

<b>Part IV-Anti Money–Laundering &amp; Combating Financing of Terrorism Regulations, policies and procedures</b>	
1	Has your country (or the country of registration, if different) established laws to prevent and criminalize money-laundering and terrorist financing? Please list the names of the relevant laws. <b>Yes</b>  <b>The most recent JMLSG Revised Money Laundering Guidance , the FCA publication “Financial Crime A Guide For Firms” the Money Laundering Regulations 2017 which implemented the 4<sup>th</sup> European Directive, the Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001 in relation to terrorist financing), the Proceeds of Crime Act 2002 (as amended by the Serious Organised Crime and Police Act 2005 (SOCPA)), the Serious Crime Act 2007, the Counter-Terrorism Act 2008, the Financial Services and Markets</b>



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	<p><b>Act 2000, the Bribery Act 2010, the Immigration Act 2014, the Financial Crime Act 2017 and any HM Treasury Sanctions Notices.</b></p> <p>Are there effective and dissuasive sanctions available to deal with natural and legal persons that fail to comply with AML/CFT requirements? <b>Yes</b></p>
2	Is your institution subject to and fully compliant with such laws? <b>Yes</b>
3	Are your institution's subsidiaries, if any, subject to and fully compliant with such laws? If no, to which countries' AML/CFT laws are they subject to and compliant with? <b>Not applicable, since we do not have any subsidiaries</b>
4	Do the laws and regulations in your country prohibit your institution from opening anonymous accounts? <b>Yes</b>
5	Does your FI adhere to FATF, Basel Committee and Wolfsberg Group AML/CFT standards? <b>Yes</b>
6	Has your institution 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: Name: <b>Mr. Graham Dorkins</b> Title: <b>Money Laundering Reporting Officer</b> Email: <b>g.dorkins@persiabank.co.uk</b> Tel: <b>+44-207-214-7202</b> Fax: <b>+44-207-606-2020</b>
7	Does your institution have AML/CFT compliance program approved by the financial institution's Board of Directors or a designated committee? If yes, Please provide a copy of applied policies. <b>(Will be provided upon request)</b>
8	How often do you review and update your AML/CFT policies? <b>As &amp; when any changes are applicable</b>
9	Does your institution have AML/CFT policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions? <b>Yes</b>
10	<p>If your answer to the question above is yes, please indicate whether your AML/CFT policies and procedures include the following topics: (please answer following questions just with yes or no)</p> <ul style="list-style-type: none"> <li>- Risk Based Assessment of customers and their transactions? <b>Yes</b></li> <li>- Enhanced level of due diligence on customers identified as having a higher risk profile? <b>Yes</b></li> <li>- Provide indicators to identify suspicious transactions? <b>Yes</b></li> <li>- Procedures for detection and reporting of suspicious transactions? <b>Yes</b></li> <li>- Ensuring that the financial institution only enters into relationships with institutions that possess licenses to operate in their countries of origin? <b>Yes</b></li> <li>- Reviewing the AML/CFT controls of institutions applying for correspondent banking services before opening an account for them? <b>Yes</b></li> <li>- Prohibiting accounts/relationships with shell banks? <b>Yes</b></li> <li>- Governing relationships with Politically Exposed Persons (PEPs)? <b>Yes</b></li> <li>- Providing regular AML/CFT training to relevant staff? <b>Yes</b></li> </ul>
11	Are your institution'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? <b>Yes, plus our Dubai office policy includes laws governing in UAE. However, please note that our Dubai Branch is due to close permanently on 9<sup>th</sup> May 2019.</b>



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12	Does your institution have an internal audit and/or compliance function to test the adequacy of AML/CFT policies and procedures? <b>Yes</b> Please specify the date of latest check? <b>January 2018</b>
13	Is your institution's compliance with AML/CFT policies and procedures regularly checked by external auditors? <b>Yes</b> Please specify the name of outsourced internal auditor and the date of latest check. <b>Moore Stephens – Date of last check January 2018</b>
14	Do you use external vendors for customer and payment screening activities? <b>Yes</b>
15	If yes, please name the software and mention what controls you use to ensure compliance with AML/CTF and sanctions requirements? <b>C6</b> <a href="https://www.kyc6.com/Permission/OsacoIndex">https://www.kyc6.com/Permission/OsacoIndex</a>

**Part V - Know your customer (KYC), Customer Due Diligence (CDD)**

1	Does your institution employ a customer identification program 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? <b>Yes</b> Please provide your records retention periods for customer records, transaction records, external reporting and staff training. <b>Minimum 5 years</b>
2	Does your institution identify the ultimate beneficial owners? <b>Yes</b>
3	Does your institution monitor and review customer information regularly? <b>Yes</b>
4	Does your institution take steps to understand the normal and expected transactions of its customers based on its profile/line of business? <b>Yes</b>
5A	<b>A-</b> Does your institution employ third parties to carry out some of the elements of the customer identification program? <b>No</b>
5B	<b>B-</b> Does your institution provide services to one-off customers? <b>Yes</b> If yes, how does your institution identify these customers? <b>Yes</b> Request the customer's ID documents <b>Request the customers address with proof of same in substantiation</b> <b>Ascertain the proof of funds</b> <b>Conduct checks against the customer and the recipient using C6 Intelligence</b> <b>Copies of all the supporting documentation are retained. Moreover, we have only conducted one such transaction in the past year.</b>
6	Please briefly describe your procedures for identification of ultimate beneficial owners, verification of source of funds, 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) <b>Clients are requested to inform us of any share ownership of 25% and above (10% for correspondent banks). From there we investigate the ownership of such parties. Source of funds is requested and the predicted business levels ascertained.</b>

**Part VI -Transaction monitoring, risk assessment and suspicious**





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<b>reporting</b>	
1	Does your institution 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? <b>Yes</b>
2	Does your institution employ special software to support its monitoring program for suspicious or unusual activity? <b>No</b>
3	Have your institution established any procedure regarding on-going monitoring of activities conducted through customer accounts? <b>Yes</b>
4	Does your institution screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/competent authorities? <b>Yes</b> If yes, please mention if the screening is done automated or manually <b>Manual</b> Please provide the sanctions list you check the clients against? <b>(OFAC, UN, EU, UK).</b>
5	Does your institution employ third parties to carry out screening and/or monitoring activities? <b>No</b>
6A	<b>A-</b> Does your institution provide a risk assessment of its customers' base and their transactions? <b>Yes</b>
6B	<b>B-</b> Does your institution identify the source of funds in transactions being made to Persia International Bank Plc (PIB)? <b>Not applicable to us. However, we do identify the source of funds in transaction being made to any individual or financial institution.</b>
7	Does your institution have monitoring procedures for reporting large cash transactions that are above a designated threshold? What is the threshold? <b>Yes – Threshold amount £10,000</b>
8	Does your institution have policy or practice for the identification and reporting of transactions that are required to be reported to the authorities? <b>Yes</b>
9	Does your institution 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? <b>Yes</b>
10	<b>A-</b> Does your institution have policies and procedures in place to address risks associated with non-face to face business relationships and transactions? <b>Yes</b>  <b>B-</b> 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? If yes, please provide details. <b>No</b>

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

Name: **Mr. Graham Dorkins**

Title: **Money Laundering Reporting Officer**

Signature:

Date: **9<sup>th</sup> May 2019**

Tel/Fax: **+44-207-214-7202**

E-mail: **[g.dorkins@persiabank.co.uk](mailto:g.dorkins@persiabank.co.uk)**