BANCO ESPAÑOL DE CREDITO, S.A. – Domicilio Social: Avda. Gran Vía de Hortaleza, núm. 3 – 28043 MADRID C.I.F.: A-28000032 Reg. Merc. de Madrid, Libro de S.A-, Tomo 36, Folio 177, Hoja 1.595

Banesto

AML QUESTIONNAIRE

the Wolfsberg Group

Section 1. CORRESPONDENT FINANCIAL INSTITUTIONS INFORMATION

1	Name of Bank /Registered Name	
2	Type of Bank (, Joint stock, Public Company…)	
3	Registered Address:	
4	Mailing Address:	
5	Registration Number:	
6	Website:	
7	Contact Person:	
8	Contact telephone nº:	
9	Fax nº:	
10	E-mail:	
11	SWIFT Code	
12	Ownership / Main shareholders	
13	Please attach a copy of your banking licence	
14	Please attach a copy of your Board Members	
15	Please attach a copy of your USA PATRIOT Act if possible	
16	Name of your supervisory authority. _____	
17	Name of your external auditors. _____	
18	Please describe your main activates / clients: (wholesale – retail banking / personal -corporate…)	
19	Please attach a list of the beneficial owners of the bank (including their nominees, if their shares are held by nominees) who own, control or have power to vote for 20% or more of any class of voting securities or other voting interests or of the 10 largest shareholders if no owner has greater than 20%.	
20	Please provide the contact details of your Compliance Officer or person in charge (name, title, telephone, fax and email)	
21	Are you listed in any Stock Exchange, if Yes, please where _____	
21	Has the FI ever been sanctioned in relation to money laundry? _____	

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Section 2. Anti-Money Laundering Questionnaire

1	Does the FI have a legal and regulatory compliance program that requires approval of the FI's Board or a senior committee thereof?	Yes ☐	No ☐
2	Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	Yes ☐	No ☐
3	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Yes ☐	No ☐
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?	Yes ☐	No ☐
5	Does the FI have a policy prohibiting accounts/relationships with shell banks? (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)	Yes ☐	No ☐
6	Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through or any of its accounts or products?	Yes ☐	No ☐
7	Does the FI have policies covering relationships with politically exposed persons (PEP´s) their families and close associates?	Yes ☐	No ☐
8	Does the FI have record retention procedures that comply with applicable law?	Yes ☐	No ☐
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?	Yes ☐	No ☐

II. *Risk Assessment*

10	Does the FI have a risk-based assessment of its customer base and their transactions?	Yes ☐	No ☐
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?	Yes ☐	No ☐

III. *Know your Customer, Due Diligence and Enhanced Due Diligence*

12	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes ☐	No ☐
13	Does the FI have a requirement to collect information regarding its customers´ business activities?	Yes ☐	No ☐
14	Does the FI assess its FI´s customers´ AML policies or practices?	Yes ☐	No ☐

15	Does the FI have a process to review and, where appropriate, update customer identification relating to high risk client information?	Yes ☐	No ☐
16	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and Know Your Customer Information?	Yes ☐	No ☐
17	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes ☐	No ☐

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IV. *Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds*

18	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes ☐	No ☐
19	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Yes ☐	No ☐
20	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?	Yes ☐	No ☐
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?	Yes ☐	No ☐

V. *Transaction Monitoring*

22	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller's checks, money orders, etc.?	Yes ☐	No ☐

VI. AML Training

23	Does the FI provide AML training to relevant employees that includes • Identification and reporting of transactions that must be reported to government authorities • Examples of different forms of money laundering involving the Fi´s products and services • Internal policies to prevent money laundering?	Yes ☐	No ☐
24	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes ☐	No ☐
25	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes ☐	No ☐
26	Does the FI employ agents to carry out some of the functions of the FI?	Yes ☐	No ☐
27	If the answer to question 26 is yes, does the FI provide AML training to relevant agents that includes • Identification and reporting of transactions that must be reported to government authorities • Examples of different forms of money laundering involving the FI´s products and services • Internal policies to prevent money laundering?	Yes ☐ Yes ☐ Yes ☐	No ☐ No ☐ No ☐

Space for additional information **We thank you in advance for your cooperation**

_____

_____

_____

I confirm that I am authorized to fill out this document:

NAME: _____

TITLE: _____

DATE: _____

SIGNATURE/ STAMP: _____