

Financial Institution Name: EXPORT-IMPORT BANK OF INDIA

**Location: CENTRE ONE BUILDING, WORLD TRADE CENTRE COMPLEX,
CUFFE PARADE, MUMBAI-400005**

This questionnaire acts as an aid to firms conducting due diligence and should not be relied on exclusively or excessively. Firms may use this questionnaire alongside their own policies and procedures in order to provide a basis for conducting client due diligence in a manner consistent with the risk profile presented by the client. The responsibility for ensuring adequate due diligence, which may include independent verification or follow up of the answers and documents provided, remains the responsibility of the firm using this questionnaire.

Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

I. General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y <input 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 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 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 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 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 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 type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	Y <input 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 type="checkbox"/>

II. Risk Assessment:	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input 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 type="checkbox"/> Please refer Annexure	N <input type="checkbox"/>

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.



III. Know Your Customer, Due Diligence and Enhanced Due Diligence:	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or	Y <input type="checkbox"/> Please refer Annexure	N <input type="checkbox"/>
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input type="checkbox"/>	N <input type="checkbox"/>
14. Does the FI assess its FI customers' AML policies or practices?	Y <input type="checkbox"/> Please refer Annexure	N <input type="checkbox"/>
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client	Y <input type="checkbox"/> Please refer Annexure	N <input type="checkbox"/>
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and	Y <input 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 type="checkbox"/> Please refer Annexure	N <input type="checkbox"/>
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:	Yes	No
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 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 type="checkbox"/> NA. We do not undertake cash transactions.	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 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 type="checkbox"/>	N <input type="checkbox"/>
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? ¹	Y <input type="checkbox"/>	N <input type="checkbox"/>
V. Transaction Monitoring:	Yes	No
23. 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 type="checkbox"/> NA. We do not undertake cash transactions.	N <input type="checkbox"/>

¹ The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)




VI. AML Training	Yes	No
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ 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. 	Y <input type="checkbox"/>	N <input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training	Y <input type="checkbox"/>	N <input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input type="checkbox"/>	N <input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y <input type="checkbox"/>	N <input type="checkbox"/>
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ 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. 	Y <input type="checkbox"/> **	N <input type="checkbox"/>

Space for additional information:
(Please indicate which question the information is referring to.)

Information pertains to Q. 28

** Though the Bank outsources some of its non-core activities, the Bank's officers are responsible and accountable for compliance with KYC norms.

Name: VIKRAMADITYA UGRA
Title: GENERAL MANAGER & PRINCIPAL OFFICER
Signature: 
Date: April 05, 2018



Annexure

KYC/AML-Export-Import Bank of India

Export-Import Bank of India (Exim Bank) was set up by an Act of Parliament (The Export-import Bank of India Act 1981, No.28 of 1981) and is wholly owned by the Government of India.

Exim Bank is an All India term Lending Institution. The Bank's clients, who are extended funded/non-funded facilities, are predominantly corporate borrowers (or their overseas wholly owned subsidiaries / joint ventures). These borrowers are registered with the Registrar of Companies in terms of the Companies Act, and they provide copies of the Memorandum and Articles of Association (Constitutional documents), which are public documents. The Bank insists upon the said constituent documents as also copies of the resolutions passed by the Board of Directors of the corporate borrowers and other supporting documents, including loan documents executed under the common seal of the company, or by the duly authorized Directors/Officers of the company for the purpose of availing facilities from the Bank. All payments to the borrowers for any amount are only effected by the Bank by means of Account payee crossed cheques or payment instructions in favour of the corporate through their bankers. Also, Exim Bank is not a commercial bank and does not undertake any retail cash transactions including issuance of travellers cheques / money orders/ demand drafts etc.

For more details, please visit our website www.eximbankindia.in

