

## Foreign Financial Institutions

### Anti-Money Laundering & Know Your Customer Questionnaire

I Ownership Structure				
1	Name of Financial Institution	Lebanese Swiss Bank SAL		
2	Date & Place of Incorporation	1962 BEIRUT, LEBANON		
3	Registered Address	El Hoss Bldg. 6 <sup>th</sup> Floor, Emile Edde Str. Hamra, Beirut-Lebanon		
4	Website	www.lebaneseswissbank.com		
5	Nature of Business:	Commercial Banking, Retail Banking, Corporate Banking		
6	Number of Branches	<b>Local Branches</b>	18	<b>Overseas Branches</b> N/A
7	Is your institution publicly owned?	<input type="checkbox"/> <b>Yes</b>		<input checked="" type="checkbox"/> <b>No</b>
8	Is your institution listed in any stock exchange?	<input type="checkbox"/> <b>Yes if yes list:</b>		<input checked="" type="checkbox"/> <b>No</b>
9	Please Confirm the areas of your Organization covered by this questionnaire			
	Head Office & Domestic Branches	<input checked="" type="checkbox"/>	Domestic Subsidiaries	<input type="checkbox"/>
			Overseas Branches	<input type="checkbox"/>
				Overseas Subsidiaries <input type="checkbox"/>
10	Names and Websites of your regulatory bodies in which you are under supervision			
	<i>Name</i>	Central Bank of Lebanon	Banking Control Commission	
	<i>Website</i>	www.bdl.gov.lb	www.bccl.gov.lb	
11	Names and Addresses of your External Auditors			
	<i>Name</i>	PriceWaterhouseCoopers <b>PWC</b>	Sarkis Sakr & Partners <b>Geneva Group International</b>	
	<i>Address</i>	Hazmieh, Baabda-Lebanon	Sami El Solh, Badaro-Lebanon	
11	Money Laundering reporting officer (AMLRO) Contact Details:			
	<i>Name</i>	NADA KAMEL FAYAD JOMAA		
	<i>Contact No.</i>	00961(4)403896		
	<i>Fax</i>	00961(4)403935		
	<i>Email</i>	AML@LEBANESESWISSBANK.COM		
12	Compliance Manager Contact Details:			
	<i>Name</i>	TAREK MATAR		
	<i>Contact No.</i>	00961(4)403922		
	<i>Fax</i>	00961(4)403935		
	<i>Email</i>	COMPLIANCE@LEBANESESWISSBANK.COM		

## AML & CFT Questionnaire

II	General AML Policies, Practices & Procedures	Please answer by:	
		Yes	No
1	Has your country established laws to combat Money Laundering & Financing of terrorism according to FATF standards & control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Is your country a member of FATF? <b>Lebanon is a Member OF MENAFATF</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Has your country been evaluated by FATF? If yes, when? (use the space provided below) <b>MENAFATF, November 2009</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Does the AML compliance program require approval of the institution's board of directors or a senior committee thereof?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Does your institution have a legal and regulatory compliance that includes a designated Compliance officer that is responsible for coordinating & overseeing the AML program on a day to day basis, which has been approved by senior management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Has your institution developed written policies documenting the process that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	In an addition to inspections by government supervisors/regulators, does your institution have an internal audit function or other independent third party that assesses AML policies on a regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Does your institution have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Does your institution have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Does your institution require that its AML policies and practices be applied to all branches and subsidiaries of your institution both in the home country and locations outside of the home country?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
III	Risk Assessment	Please answer by:	
		Yes	No
12	Does your institution have a risk focused assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13	Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your institution has reason to believe pose a heightened risk of illicit activities at or/ through your institution?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
IV	Know Your Customer, Due Diligence and Enhanced Due Diligence	Please answer by:	
		Yes	No
14	Has your institution implemented systems for the identification of its customers including customer information, in the case of recorded transactions, account opening etc. (e.g. name, nationality, street address, telephone number, occupation, age, date of birth, type and number of valid identification, as well as the name of the country/state that issued it).	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15	Does your institution have a requirement to collect information regarding its customer's business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Does your institution have procedures to establish a record for each customer noting their respective identification documents and know your customer information collected as account opening?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17	Does your institution take steps to understand the normal and expected transactions of its customers based in its risk assessment of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

18	Does your institution deal with walk-in customers? If yes, how do you check source of funds used? (use the space provided below)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>V</b>	<b>Reportable Transactions and Prevention and Detection of Transactions with Illegally obtained Funds</b>	Please answer by: Yes No	
19	Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20	Does your institution have procedures to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21	Does your institution screen transactions of customers or transactions that your institution deems to be of significantly high risk? (Which may include person, entities or countries that are contained on lists issued by the government / international bodies) were special attention to such customer or transactions is necessary prior to completing any such transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VI</b>	<b>Transaction Monitoring</b>	Please answer by: Yes No	
22	Does your institution have a monitoring program for suspicious or unusual activities that covers funds transfers and monetary instruments? (Such as traveler's checks, money orders etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VII</b>	<b>AML Training</b>	Please answer by: Yes No	
23	Does your institution provide AML & Compliance training to all employees that include identification & reporting of transaction that must be reported to government authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
24	Does your institution retain records of its training sessions including attendance records & AML undertaken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25	Does your institution have policies or practices to communicate new AML related laws or change to existing AML related policies or practices to all employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>VIII</b>	<b>Correspondent Banking Relationship</b>	Please answer by: Yes No	
26	Have any of your correspondent banks originated from certain jurisdiction such as Non-Cooperative countries and territories, countries sanctioned by the United Nations and/or any regulatory bodies etc.?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27	Has your institution established any procedures regarding the ongoing monitoring of activities conducted through such correspondent accounts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28	Does your institution have policies to reasonably ensure that your correspondent banks maintain accounts with yourselves, will not conduct transactions with or on behalf of shell banks through any of their accounts or products?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

We confirm that we are authorized to complete this questionnaire and that to the best of our knowledge:

<b>Name</b>	<b>TAREK MATAR</b>	
<b>Title</b>	<b>HEAD OF COMPLIANCE</b>	
<b>Date</b>	<b>31/03/2015</b>	
<b>Authorized Signature</b>		