CHAM BANK
QUESTIONNAIRE

Dear Correspondent Banks,,,

This Questionnaire is Cham Bank Exclusive as part of the enhanced due diligence application on Correspondent Banks and financial institutions in Connection to the procedures adopted by the compliance control department.
Therefore, we appreciate Completing the attached AML QUESTIONNAIRE, and providing us with the required documents.

With best regards

Cham Bank
Compliance control department

ABOUT US:

Cham Bank, private bank in the charter of a Syrian Joint Stock Company.
Cham bank Was established on September 7, 2006 with a capital of 9 billion Syrian Pounds and registered at the Commercial Register under No.14809 dated January 24th, 2007 (the 5th of Muharram 1428), and registered at the Syrian Central Bank under license No. 15.

Cham Bank is the first Islamic Bank in Syria to take the Islamic Sharia Approach. The Bank's Operations and Activities are subject to the Central Bank of Syria and the Islamic Committee Monitoring.

بنك الشام
CHAM BANK

Section 1: General Information:		
1. Full Financial Institution Name (FI):		
2. Country of incorporation:		
3. Full Address of incorporation:		
4. Registered address of the FI:		
5. Telephone Number:		
6. Official Website:		
7. SWIFT Code:		
8. Commercial Registration:	No:	
	Date:	
	Validity:	
9. Banking License:	No:	
	Date:	
	Validity:	
10. Principal Banking activities:		
11. Name of external Auditors:		
12. Regulator Authority's Name:		
13. Number of branches (Domestic, Foreign):		
14. Number of employees:		
15. Contact point of AML\CFT control:		

Name:		Name:	
Title:		Title:	
Address:		Address:	
Telephone:		Telephone:	
E-mail:		E-mail:	

Section 2: Ownership, Management and Information:		
1. Is the FI a private company?	**Yes** ❑	**No** ❑
2. Is your Institution listed on any stock exchanges?	**Yes** ❑	**No** ❑
If Yes,Please specify		

3. Please list (or attach a listing of) all parties owning %5 or more of the issued capital of your institution.

4. Please provide us with a list of Board of Directors and top Management.

CERTIFIED QUALITY MANAGEMENT SYSTEM UNITED REGISTRAR OF SYSTEMS URS ISO 9001 UNITED REGISTRAR OF SYSTEMS URS ISO 27001 UKAS MANAGEMENT SYSTEMS 0043

Section 3: General AML Policies, Practices and Procedures:		
1. Is the AML compliance program approved by the FI's board or a senior committee?	**Yes** ☐	**No** ☐
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?	**Yes** ☐	**No** ☐
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	**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 it 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 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** ☐

Section 4: Risk Assessment:		
1. Does the FI have a risk-based assessment of its customer base and their transactions?	**Yes** ☐	**No** ☐
2. 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** ☐

Section 5: Country Legislations:		
1. Is money laundering and terrorists financing considered a crime in your country?	Yes ☐	No ☐
2- Has your country established laws designed to prevent money laundering and terrorists financing?	Yes ☐	No ☐
If YES Please list the name of the FI's country's relevant laws (Name, Date and No. of the law decree, regulation,….etc.)	Yes ☐	No ☐
3- Is the FI compliant with these laws?	Yes ☐	No ☐
IF NO Please explain, and specify the aspects you do not comply with.		

Section 6: Know Your Customer, Customer Due Diligence, Enhanced Due Diligence:		
1. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or Conducts transactions?	Yes ☐	No ☐
2. Does the FI have a requirement to collect information regarding its customers' business activities?	Yes ☐	No ☐
3. Does the FI assess its FI customers' AML policies or practices?	Yes ☐	No ☐
4. Does the FI have a process to review and, where appropriate, update customer information relating to high-risk client information?	Yes ☐	No ☐
5. 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 ☐
6. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes ☐	No ☐

Section 7: Reportable Transactions, Prevention/Detection of Illegally Obtained Funds:		
1. Does the FI have an established method of reporting suspicious activities and/or transactions to the appropriate authorities?	Yes ☐	No ☐
2. Does the FI have a screening process to search its client database against government published lists of prohibited/sanctioned parties?	Yes ☐	No ☐
3. Does the FI screen payments/transactions for government published lists of prohibited/sanctioned parties?	Yes ☐	No ☐
4. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT202/202COV and MT205/205COV message formats?	Yes ☐	No ☐
5. Does the FI have a transaction monitoring system to enable it to detect suspicious payments or transactions in relation to AML/CFT?	Yes ☐	No ☐
If Yes, Which system(s)/provider(s) do the FI use?		
6. Does the FI have a transaction monitoring system to enable it to detect suspicious payments or transactions in relation to financial sanctions?	Yes ☐	No ☐
If Yes, Which system(s)/provider(s) do the FI use?		
7. Which lists does the FI screen against?		

(e.g. EU, UN, OFAC, …etc.)		
8. Has the FI been subject to any investigation, indictment, conviction, or civil enforcement action related to money laundering and terrorism financing in the past five years?	**Yes** ☐	**No** ☐
9. Does the FI follow FATF recommendations on money laundering and terrorists financing?	**Yes** ☐	**No** ☐

Section 8: AML Training:		
1. 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** ☐
2. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	**Yes** ☐	**No** ☐
3. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	**Yes** ☐	**No** ☐
4. Does the FI employ third parties to carry out some of the functions of the FI?	**Yes** ☐	**No** ☐
If the answer to question 4 is Yes, does the FI provide AML training to relevant third parties 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** ☐

Section 9: SANCTIONS:		
1. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions?	**Yes** ☐	**No** ☐
2. Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	**Yes** ☐	**No** ☐
3. Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	**Yes** ☐	**No** ☐
4. does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	**Yes** ☐	**No** ☐

5. Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	**Yes** ☐	**No** ☐
6. for Q 4-5, What is the method used by the Entity? **A-** Manual – **B-** Automated – **C-** Combination of Automated and Manual	**A** ☐ **B** ☐	**C** ☐
7. Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	**Yes** ☐	**No** ☐
8. Confirm that all responses provided in the above Section SANCTIONS are representative of all the LE's branches	**Yes** ☐	**No** ☐
8.A-If No, clarify which questions the difference/s relate to and the branch/es that this applies to.		
8.B-If appropriate, provide any additional information / context to the answers in this section.		

Section 10: FATCA status:		
1. Is your FI a FATCA compliant?	**Yes** ☐	**No** ☐
If yes: What is your FATCA status?		
Please provide your Global Intermediary Identification Number (GIIN)		
If No, When do you intend to become a FATCA compliant?		

Section 11: Payable Through Accounts		
1. Does your FI allow third parties to have direct access to your correspondent banking account?	**Yes** ☐	**No** ☐
2. Has your FI verified the identity of any third party having direct access to your correspondent banking account (including all signatories)?	**Yes** ☐	**No** ☐
3. Does your FI perform ongoing due diligence on any third party having direct access to your correspondent banking account (including all signatories)?	**Yes** ☐	**No** ☐
4. Is your FI willing and able to provide customer identification information on the third party (and all signatories) to Westpac upon request?	**Yes** ☐	**No** ☐

Authorized Info:		
Name:		**Stamp**
Title:		
Date:		