



## AML & CFT Compliance Questionnaire For Correspondent Banks

(Pls type the relevant information below)

### FINANCIAL INSTITUTION'S INFORMATION

<b>1</b>	Registered Name:	<b>EI Nilein Bank Abu Dhabi</b>		
<b>2</b>	Registered/Current Address: <i>(Building Name, Street/Area, Post/Zip code, State, City, Country)</i>	<b>ABU DHABI - KHALIFA STREET - MAITHA GHANEM HAMDAN AL FALAHI BUILDING P.O BOX 46013 - ABU DHABI - U.A.E.</b>		
<b>3</b>	Mailing Address: <i>(If different from the current address) - (Building Name, Street/Area, Post/Zip code, State, City, Country)</i>	<b>As Above</b>		
<b>4</b>	Website Address:	<b>www.nileinuae.com</b>		
<b>5</b>	Jurisdiction under which incorporated: <i>(Please provide copy of incorporation certificate)</i>	<b>United Arab Emirates</b>		
<b>6</b>	Institution's Trade / Commercial License No. <i>(Please provide copy of license)</i>	<b>CN-1002010</b>		
<b>7</b>	Is there any type of restriction in your institution license? If there is, please elaborate:	<b>NONE</b>		
<b>8</b>	Number of Branches / Subsidiaries:	<b>Locally:</b> 1	<b>Overseas:</b>	Not Applicable
<b>9</b>	Name of External Auditors:	<b>HLB</b>		
<b>10</b>	- Name of your Central Bank/Regulatory body: - Central Bank License number:	- <b>Central Bank of U.A.E.</b> - <b>358</b>		
<b>11</b>	What type of relationship is maintained by the FI with EI Nilein Bank	<b>Correspondent Bank</b>		

### SHAREHOLDING STRUCTURE

<b>12</b>	Is the FI listed on any Stock Exchange?	<b>N</b>	<b>If yes, provide the name:</b>	<b>Not Applicable</b>
<b>13</b>	a. State whether there are Politically Exposed Persons (PEP) within the executive bodies of the Bank.	<b>N</b>		
<b>14</b>	b. If yes, please provide the names of the PEPs:	<b>Not Applicable</b>		
<b>15</b>	Please provide the list of the shareholding together with this questionnaire. <b>EI Nilein Bank - Sudan</b>			
<b>16</b>	Provide the list of the members of the Board of Directors and Key Management (e.g. CEO, CFO, MD, GM, etc.) with this questionnaire. <b>Pls refer to our website;- www.nileinuae.com</b>			
<b>17</b>	Provide the list of authorized signatories with this questionnaire. ??			

### GENERAL AML/CFT POLICIES, PRACTICES & PROCEDURES

<b>18</b>	Has your country of registration established laws designed to combat money laundering and terrorist financing? If yes, please list the name of your country's relevant laws (Name, Date and No. of the law (decree, regulation, etc.) below.	<b>Y</b>	
	<b>Name of regulatory body:</b>	<b>Central Bank of U.A.E</b>	
	<b>AML Law Issued on:</b>	<b>List of Key Laws attached</b>	
	<b>AML Law No.:</b>	<b>Federal Decree-law No. (20) of 2018 on ANTI-MONEY LAUNDERING and COMBATING THE FINANCING OF TERRORISM AND FINANCING OF ILLEGAL ORGANISATIONS</b>	
<b>19</b>	Is the FI in compliance with its jurisdiction's national AML/CTF laws?	<b>Y</b>	
<b>20</b>	a. Is the AML compliance program approved by the FI's board or a Senior Management Committee? If yes, please provide a copy.	<b>Y</b>	
	b. 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?	<b>Y</b>	





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	<b>c.</b>	If 20.b is "Yes", please briefly share the topics covered in your policy:	The policy Covers;- <b>AML-CFT Policy &amp; Procedure - Regulatory &amp; Compliance Governance P&amp;P - KYC/Risk Based Approach P&amp;P - AML Risk Assessment P&amp;P</b>
<b>21</b>	Does the FI have a legal and regulatory compliance program that includes a designated officer who is responsible for coordinating and overseeing the AML framework? If yes, please provide the details of the designated compliance / AML officer.		<b>Y</b>
	Name:	<b>Dr. Shamseldin Hassan Mohamed</b>	
	Designation:	<b>Chief Compliance Officer - MLRO</b>	
	Email Address:	<b>Shamseldin@nileinuae.com</b>	
<b>22</b>	<b>a.</b>	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<b>Y</b>
	<b>b.</b>	If 22.a is "Yes", please briefly share the topics covered in your policy:	<b>The Policy covers;- AML-CFT Policy &amp; Procedure – Transaction Monitoring and Reporting P&amp;P</b>
<b>23</b>	<b>a.</b>	In addition to inspections by the government supervisors / regulators, does the FI have an Internal Audit Function or other independent third party that assesses AML policies and practices on a regular basis?	<b>Y</b>
	<b>b.</b>	If 23.a is "Yes", please share what were the last Internal Audit comments :	There were few minor comments and overall assessment was that we are following good practices complying with local regulatory requirements.
<b>24</b>	<b>a.</b>	Confirm whether the FI has been subjected to money laundering / terrorist financing investigations in the past or at present.	<b>N</b>
	<b>b.</b>	If 24.a is "Yes", then confirm if the investigating regulatory authority penalized the FI. <b>N/A</b>	<b>N/A</b>
<b>25</b>	<b>a.</b>	Does the FI have a policy prohibiting accounts/relationships with Shell Banks or Shell Companies?	<b>Y</b>
	<b>b.</b>	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?	<b>Y</b>
<b>26</b>	<b>a.</b>	Does the FI allow customers to establish "Payable through Accounts"? <i>(Accounts which provide your customers or your correspondent banks' customer with Cheques that enable them to draw on your account at another correspondent bank)</i>	<b>N</b>
	<b>b.</b>	Does the FI allow customers to establish "Nested Accounts" / "Downstream Relationships"? <i>(This occurs when an FI has a foreign currency correspondent account with a bank and uses that account to offer services to or facilitate payments for other banks)</i>	<b>N</b>
<b>27</b>	<b>a.</b>	Does the FI have customers Record Retention Procedures that comply with Applicable Law?	<b>Y</b>
	<b>b.</b>	If 27.a is "Yes", confirm for how many years does the FI is mandated to retain the customer record.	<b>Five Years after closing the Relationship</b>
<b>28</b>	<b>a.</b>	Does the FI conduct transactions for non-established customer's i.e. walk-in customers?	<b>N</b>
	<b>b.</b>	If 28.a is "Yes", please explain the KYC procedures on such customers.	<b>Not Applicable</b>
<b>REPORTABLE TRANSACTIONS &amp; PREVENTION &amp; DETECTION OF TRANSACTIONS From AML &amp; SANCTIONS PERSPECTIVE</b>			
<b>29</b>	Does the FI have any branches in sanctioned countries? Please specify the countries:		<b>N</b>
	Name of Countries:	<b>Not Applicable</b>	
<b>30</b>	Please confirm if the FI have relationship with customers in a sanctioned jurisdiction. If Yes, Please describe the type of business and policy applicable to those customers.		<b>N</b>





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	Please describe:	Not Applicable		
31	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the country's Local Authorities? If yes, please provide a copy.		Y	
32	Where Cash Transaction Reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? <b>Cash Transaction reporting is not mandatory, however, we have procedures to identify transactions structured to avoid threshold requirement.</b>		N/A	
33	a. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		Y	
	b. If 33.a is "Yes", then share the name of the key sanctions lists used.	UN, OFAC, HRMC-UK, EU and UAE Lists		
34	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	
<b>RISK ASSESSMENT</b>				
35	Does the FI have a Risk-Based Assessment of its customer base and their transactions?		Y	
36	Does the FI have policies to conduct Enhance Due Diligence on Politically Exposed Persons (PEP's), their family and close associates?		Y	
37	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	
38	<b>Does the FI accept the following type of customers? If yes, please provide a description of the KYC / due diligence standards applied in dealing with these types of customers; -</b>			
	1. Exchange Houses, Money transfer, money service business. <b>YES</b>		Y	
	2. Embassies and / or Consulates. <b>Yes</b>		Y	
	3. Non-Profit Organizations / Charities. <b>YES</b>		Y	
	4. Precious Stones / Jewelers Dealers. <b>No</b>			N
	5. Companies whose ownership is through bearer shares. <b>No</b>			N
	6. Trusts. <b>No</b>			N
	7. Internet banks (banks operating solely on the internet without branches). <b>No</b>			N
	8. Remote banking clients (clients that are not physically present at the opening of new accounts / relationships). <b>No</b>			N
	9. Offshore companies. <b>No</b>			N
	10. Cash-for-gold shops (shops buying gold objects for cash) <b>No</b>			N
	<b>Please describe:</b>	<b>We have proper Enhanced Due Diligence (EDD) Procedures and Risk Assessment Process and the requirement of obtaining Management Approval for above-mentioned Clients.</b>		





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### KNOW YOUR CUSTOMER, DUE DILIGENCE AND ENHANCED DUE DILIGENCE

39	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? If yes, please provide a copy.	Y	
40	Does the FI have a requirement to collect information regarding its customers' business activities?	Y	
41	Does the FI assess its FI customers' AML Policies or practices?	Y	
42	Does the FI have a process to review and, where appropriate, update customer information relating to High-Risk Client information?	Y	
43	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y	

### TRANSACTION MONITORING

44	a.	Does the FI have a monitoring program/solution for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler's checks, money orders, etc.? If yes, please provide the name of the program/solution.	Y	
	<b>Name of monitoring system:</b> Egabi + Accuity			
	b.	If 44.a is "Yes", please confirm if the monitoring program/solution has the capability to conduct perpetual screening of the FI's customer base on a periodic basis.	Y	

### AML TRAINING

45	a.	Does the FI provide AML Training to relevant employees?	Y	
	b.	Does the AML training contents includes the following: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to government authorities.</li> <li>• Examples of different forms of money laundering involving the FI's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	Y	
	c.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y	
	d.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y	
46	a.	Does the FI employ Third Parties to carry out some of the functions of the FI?		N
	b.	If 46.a is "Yes", does the FI provide AML training to relevant third parties that includes the same AML contents as mentioned in point 45.b. <b>Not Applicable</b>	N/A	

### FOREIGN ACCOUNT TAX COMPLIANCE ACT - FATCA

47	a.	Has your Regulator initiated measures/ developments to comply with FATCA, as per US IRS requirement?	Y	
	b.	If 47.a is "Yes", Please specify the signed Model Agreement? Reporting Model 1 FFI		
48	a.	Has your institution initiated measures/ developments to be in compliance with FATCA, as per US IRS requirement?	Y	
	b.	If 48.a is "Yes", Please provide the Global Intermediary Identification Number (GIIN). <b>RNHSQG.00001.ME.784</b>		





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49 Please share the W8BEN-E form with this questionnaire.

### TAX RESIDENCE INFORMATION

Please complete the following table indicating (i) the Country (or Countries) in which the Financial Institution is a Resident for Tax purposes and (ii) the Financial Institution's Taxpayer Identification Number (**TIN**) or functional equivalent for each Country indicated.

If the Financial Institution is not a resident for Tax purposes in any jurisdiction, for example, it is fiscally transparent, please indicate that on line 1 of the following table and provide its place of effective management or country in which its principal office is located. If a TIN is unavailable, please provide reason **A, B, C & D** where appropriate:

<b>Reason A</b>	The country where the Financial Institution is liable to pay tax does not issue TINs to its residents.
<b>Reason B</b>	The Financial Institution is otherwise unable to obtain a TIN or functional equivalent (please explain why Financial Institution is unable to obtain a TIN in the table below if you have selected this reason).
<b>Reason C</b>	No TIN is required (note: only select this reason if the authorities of the Country of residence for tax purposes entered below do not require the TIN to be disclosed).
<b>Reason D</b>	The country of Financial Institution's incorporation does not have tax policies.

SN	Country of Tax Residence	TIN or Equivalent No.	Reason	Remarks (incase Reason B is selected)
1	U.A.E.	100386253700003		
2				
3				

If the answer to any of the above points is "No", then please provide additional details below.  
(Please indicate which question the information is referring to)

<b>Name of Authorized Signatory:</b>	DR. Shamseldin Hassan Mohammed		
<b>Designation:</b>	Chief Compliance Officer and MLRO		
<b>Email Address:</b>	Shamseldin@nileinuae.com	<b>Contact No:</b>	02-6269995
<b>Signature:</b>		<b>Date:</b>	5/6/2020

