

Brussels, 22 October 2014

## **Annex 1 to circular NBB\_2014\_11**

### Scope

- *all credit institutions, including EU and non-EU branches;*
- *all stockbroking firms, including EU and non-EU branches;*
- *all insurance companies carrying on life insurance business, including EU and non-EU branches;*
- *all payment institutions and electronic money institutions, including EU and non-EU branches, with the exception, however, of institutions which, by virtue of Articles 48 or 105 of the Law of 21 December 2009, are exempted from the application of the provisions of this law;*
- *all central contact points in Belgium of payment institutions and electronic money institutions to which authorisation has been granted in other member states of the European Economic Area, with the exception, however, of those which are subject, under Circular NBB\_2014\_12, to the obligation to complete the short-form questionnaire attached to this circular;*
- *settlement institutions, including EU and non-EU branches.*

# PERIODIC QUESTIONNAIRE ON THE PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

B/S/SF	Ins	P/EMI	<b>I. IDENTIFICATION OF CUSTOMERS</b>			
<b>General objectives</b>	<b>1.1</b>	Do you consider that your institution's internal procedures for the identification of customers are fully, largely, partly or insufficiently consistent with the relevant legal and regulatory requirements ?			fully / largely / partly / insufficiently	
	1.1.c	<i>Comment :</i>				
	<b>1.2</b>	Do you consider that, in practice, the above-mentioned internal procedures for the identification of customers are fully, largely, partly or insufficiently effectively implemented within your institution ?			fully / largely / partly / insufficiently	
	1.2.c	<i>Comment :</i>				
<b>Establishment of a business relationship</b>	<b>1.3</b>	Do your institution's internal procedures make use of the possibility to authorise the postponement of the verification of the identity of customers when establishing a business relationship, in the exhaustively listed circumstances in which the due diligence obligations cannot be met before establishing a business relationship with the customers? (Art. 3, paragraphs 2 and 3 of the Regulation) ?			Yes / No / N/A	
	1.3.c	<i>Comment :</i>				
	<b>1.3.1</b>	Does your institution occasionally or regularly make use of the services of « third party business introducers » as referred to in Article 10, § 1 of the Law (e.g. non-exclusive insurance intermediaries, intermediaries in banking and investment services or other financial institutions whether or not belonging to its group) to fulfil its obligations of identifying or verifying the identity of customers, their agents and their beneficial owners ?			Yes / No / N/A	
	1.3.1.c	<i>Comment :</i>				
	<b>1.3.2</b>	If so, do your institution's internal procedures ensure that it is verified that the third party business introducers concerned meet the requirements set out in Article 10, § 1, of the Law, and that the documentation on which this verification is based, is retained?			Yes / No / N/A	
	1.3.2.c	<i>Comment :</i>				
	<b>1.3.3</b>	Do your institution's internal procedures stipulate that the following conditions must be met where your institution makes use of the services of a third party business introducer to fulfil its obligations of identifying customers, their agents and their beneficial owners : <ul style="list-style-type: none"> <li>• the third party business introducer must provide your institution promptly with the identification data regarding the customer, its agents and its beneficial owners; and</li> </ul>			Yes / No / N/A	

		<ul style="list-style-type: none"> <li>the third party business introducer must provide your institution at the same time and promptly, or must previously undertake in writing to provide, on first request of the institution, a copy of the supporting documents by means of which he has verified the identity of the persons concerned?</li> </ul>	
	1.3.3.c	Comment :	
	1.3.4	Do your institution's internal procedures stipulate that the use of the services of a third party business introducer is authorised only where the latter makes a face-to-face identification of the customer ?	Yes / No / N/A
	1.3.4.c	Comment :	
	1.3.5	Where your institution makes use of the services of a third party business introducer to fulfil its obligation of identifying customers, their agents and their beneficial owners, do your institution's internal procedures stipulate that it must be verified by its services that the identification of the customer, its agents and its beneficial owners, and the identity verification of these persons have been carried out completely and correctly by the third party business introducer, in accordance with the legal and regulatory requirements, and, if such is not the case, that a supplementary identification and verification must be carried out ?	Yes / No / N/A
	1.3.5.c	Comment :	
<b>Numbered accounts</b>	1.4	Does your institution authorise the opening of numbered accounts or the conclusion of numbered contracts ?	Yes / No / N/A
	1.4.c	Comment :	
	1.5	If so, do your institution's internal procedures provide for specific rules establishing the terms and conditions for opening and operating such accounts, while specifically ensuring compliance with the provisions of Articles 7, 8, 12, 13, 14 and 15 of the Law, as well as with those of the Regulation establishing the implementing rules of these legal provisions ? (Art. 5, paragraph 2, of the Regulation)	Yes / No / N/A
	1.5.c	Comment :	
<b>Occasional transactions</b>	1.6	Do your institution's internal procedures provide for the identification and identity verification of the occasional customer where the transaction involves an amount exceeding the threshold of 10,000 € ? (Article 7, § 1, paragraph 1, 2° a., of the Law).	Yes / No / N/A
	1.6.c	Comment :	
	1.7	Do your institution's internal procedures provide for a threshold lower than 10,000 € for the identification and identity verification of occasional customers ?	Yes / No / N/A
	1.7.c	Comment :	
	1.8	Do your institution's internal procedures provide for a threshold lower than 10,000 € ? (If so, please specify this threshold in the comment)	Yes / No / N/A
	1.8.c	Comment :	

					Do your institution's internal procedures specify the method applicable for :	
				<b>1.9</b>	a) adding up, for the calculation to determine the crossing of the above-mentioned threshold, the transactions carried out by one and the same occasional customer which are apparently related transactions (Article 7, § 1, paragraph 1, 2° a., of the Law) ?	Yes / No / N/A
				1.9.c	<i>Comment :</i>	
				<b>1.10</b>	b) qualifying as a business relationship the relationship with a customer who contacts your institution on a regular and repeated basis for carrying out distinct and successive financial transactions outside the context of a contractual business relationship (Art. 4, paragraph 2, of the Regulation) ?	Yes / No / N/A
				1.10.c	<i>Comment :</i>	
				<b>1.11</b>	Do your institution's internal procedures provide for the identification of occasional customers and for the verification of their identity irrespective of the amount of the transaction, where this transaction consists in a transfer of funds as referred to in Regulation (EC) No. 1781/2006 of the European Parliament and of the Council of 15 November 2006 on information on the payer accompanying transfers of funds? (Article 7, § 1, paragraph 1, 2° b., of the Law)	Yes / No / N/A
				1.11.c	<i>Comment :</i>	
				<b>1.12</b>	Do your institution's internal procedures provide for the identification of occasional customers who wish to carry out a transaction involving an amount lower than 10,000 € where there is a suspicion of money laundering or terrorist financing? (Art 7, § 1, paragraph 1, 3°, of the Law)	Yes / No / N/A
				1.12.c	<i>Comment :</i>	
				<b>1.13</b>	Where a customer or a product falls within one of the categories specified in Article 11, § 1 or § 2, of the Law (low risks), do your institution's internal procedures prescribe that an identification and identity verification of the customer and his beneficial owners must be carried out in accordance with Articles 7 and 8 of the Law as soon as a suspicion of money laundering or terrorist financing arises ?	Yes / No / N/A
				1.13.c	<i>Comment :</i>	
				<b>1.14</b>	Do your institution's internal procedures prescribe that a customer must be re-identified in case of doubt about the veracity or accuracy of the identification data regarding the customer?	Yes / No / N/A
				1.14.c	<i>Comment :</i>	
				<b>1.15</b>	Do your institution's internal procedures prescribe that the identification data regarding natural persons (surname, first name, place and date of birth) must be verified by means of a supporting document (Article 7, § 1, paragraphs 1 and 3, of the Law, Article 7, §1, of the Regulation) ?	Yes / No / N/A
				1.15.c	<i>Comment :</i>	

				1.16	Do your institution's internal procedures specify which measures must be taken, to the extent possible, in order to collect relevant information regarding the customer's address (Article 7, § 1, paragraph 3, of the Law) ?	Yes / No / N/A
				1.16.c	Comment :	
				1.17	Do your institution's internal procedures prescribe that the remote verification of the identity of natural persons must be carried out by means of one of the supporting documents listed in Article 7, § 2, of the Regulation ?	Yes / No / N/A
				1.17.c	Comment :	
				1.18	In case of remote verification of the identity of natural persons by means of a copy of the customer's identity card without verifying its veracity in the National Register, do your institution's internal procedures provide for a systematic and formalised preliminary analysis which allows to ascertain that neither the customer concerned nor the business relationship to be established with him, represent a specific risk of money laundering or terrorist financing ? (Art. 7, § 2, paragraph 2, of the Regulation) ?	Yes / No / N/A
				1.18.c	Comment :	
				1.19	Do your institution's internal procedures prescribe that the customer's identity must be re-verified by means of another supporting document than a mere copy of the identity card or passport, where - in the course of a business relationship - the exercise of ongoing due diligence with regard to the latter reveals that a specific risk of money laundering or terrorist financing is associated with the customer or the business relationship? (Art. 29, 3rd indent, of the Regulation).	Yes / No / N/A
				1.19.c	Comment :	
				1.20	Do your institution's internal procedures prescribe that the identification data regarding legal persons must cover the corporate name, registered office and directors and that note must be taken of the provisions regarding the power to commit this legal person ? (Art 7, § 1, paragraph 4, of the Law) ?	Yes / No / N/A
				1.20.c	Comment :	
				For the customers who are legal persons governed by Belgian law, do your institution's internal procedures prescribe that their identity must be verified by means of :		
				1.21	a) the latest coordinated version of the articles of association or the updated articles of association of the legal person customer filed with the registry of the Commercial Court or published in the annexes to the Belgian Official Gazette? (Art. 8, § 1, of the Regulation) ?	Yes / No / N/A
				1.21.c	Comment :	

				1.22	b) the list of directors of the legal person customer and the publication of their appointments in the Belgian Official Gazette, or any other supporting document which allows to establish their capacity of directors, such as any publication in the Belgian Official Gazette in which these persons are mentioned as directors, or the annual accounts filed at the National Bank of Belgium ? (Art. 8, § 1, of the Regulation) ?	Yes / No / N/A
				1.22.c	Comment :	
				1.23	c) the latest publication in the Belgian Official Gazette of the representation powers of the legal person customer ? (Art. 8, § 1, of the Regulation) ?	Yes / No / N/A
				1.23.c	Comment :	
				1.24	Do your institution's internal procedures, for customers who are legal persons governed by foreign law, prescribe that their identity must be verified by means of supporting documents which are equivalent to those listed in § 1 of Article 7 of the Regulation and, if necessary, by means of their translation in one of the national languages or in English ? (Art. 8, § 2, of the Regulation) ?	Yes / No / N/A
				1.24.c	Comment :	
				1.25	Do your institution's internal procedures prescribe that the identity of customers who are trusts, de facto associations, fiduciaries or any other legal arrangements without legal personality, must be verified by means of knowledge elements relating to the existence, the nature, the purposes pursued and the management and representation modalities of the legal arrangement concerned, and that these elements must be verified by means of any documents which may be considered as evidence and of which a copy is taken ? (Art. 9 of the Regulation) ?	Yes / No / N/A
				1.25.c	Comment :	
				Do your institution's internal procedures make use of the possibility provided for in Article 11, § 1, of the Law not to carry out the identification and identity verification of customers who fall within the following categories or of their beneficial owners :		
				1° the credit institutions or financial institutions referred to in Article 2 of Directive 2005/60/EC, established :		
				1.26	a/ in Belgium	Yes / No / N/A
				1.26.c	Comment :	
				1.27	b/ in another country of the European Economic Area	Yes / No / N/A
				1.27.c	Comment :	
				1.28	c/ in a third country which imposes obligations and a control equivalent to those laid down in Directive 2005/60/CE ("equivalent third countries ")	Yes / No / N/A
				1.28.c	Comment :	

		2° listed companies whose securities are admitted to trading on a regulated market :	
	<b>1.29</b>	a/ in a country of the European Economic Area	Yes / No / N/A
	1.29.c	Comment :	
	<b>1.30</b>	b/ in a third country where they are subject to disclosure requirements consistent with Community legislation	Yes / No / N/A
	1.30.c	Comment :	
	<b>1.31</b>	3° the Belgian public authorities	Yes / No / N/A
	1.31.c	Comment :	
	<b>1.32</b>	4° the European public authorities and institutions.	Yes / No / N/A
	1.32.c	Comment :	
	<b>1.33</b>	Do your institution's internal procedures, for each of the cases referred to in questions 1.26 up to 1.32 above to which you have responded affirmatively, specify the adequate information which must be collected in order to determine whether the customer meets the conditions in order to qualify for the exemption as laid down in Article 11, § 1, of the Law ?	Yes / No / N/A
	1.33.c	Comment :	
	If you have responded affirmatively to question 1.28, do your institution's internal procedures stipulate that the following countries may be regarded as equivalent third countries :		
	<b>1.34</b>	a/ the member countries of the Financial Action Task Force (FATF), pursuant to Article 44, paragraph 4, of the Law ?	Yes / No / N/A
	1.34.c	Comment :	
	<b>1.35</b>	b/ the countries included in the list of equivalent third countries as published by the European Commission on its website ?	Yes / No / N/A
	1.35.c	Comment :	
	<b>1.36</b>	c/ the countries for which an analysis carried out by your financial institution or, where appropriate, by the financial group to which it belongs, establishes that they meet the equivalence conditions ?	Yes / No / N/A
	1.36.c	Comment :	
	<b>Exemptions from identification</b>	Do your institution's internal procedures make use of the possibility provided for in Article 11, § 2, of the Law not to proceed to the identification and identity verification of customers and their beneficial owners where the financial product or the transaction requested by the customer falls within the following categories :	
		<b>1.37</b>	1° life insurance policies where the annual premium does not exceed 1,000 € or the single premium does not exceed 2,500 €

			1.37.c	Comment :	
			<b>1.38</b>	2° insurance policies for pension schemes if there is no surrender clause and if the policy cannot be used as collateral	Yes/ No / N/A
			1.38.c	Comment :	
			<b>1.39</b>	3° a pension, superannuation or similar scheme that provides retirement benefits to employees, for which contributions are made by way of deduction from wages and where the scheme rules do not permit the participants to transfer their rights	Yes / No / N/A
			1.39.c	Comment :	
			<b>1.40</b>	4° electronic money, insofar as the maximum amount stored in the device is no more than 150 € if the storage device cannot be recharged or, if the storage device can be recharged, insofar as a limit of 2,500 € is imposed on the total amount of transactions in a calendar year (except where an amount of more than 1,000 € is redeemed).	Yes / No / N/A
			1.40.c	Comment :	



B/S/SF	Ins	P/EMI	<b>II. IDENTIFICATION OF AGENTS</b>			
			<b>General objectives</b>	<b>2.1</b>	Do you consider that your institution's internal procedures regarding the identification of agents of customers are fully, largely, partly or insufficiently consistent with the relevant legal and regulatory requirements ?	fully / largely / partly / insufficiently
				2.1.c	Comment :	
				<b>2.2</b>	Do you consider that, in practice, the above-mentioned internal procedures regarding the identification of agents of customers are fully, largely, partly or insufficiently effectively implemented within your institution ?	fully / largely / partly / insufficiently
				2.2.c	Comment :	
			<b>Moment of identification of the agents</b>	Do your institution's internal procedures provide for the identification and identity verification of agents of customers by means of a supporting document of which a copy is taken on paper or by electronic means :		
				<b>2.3</b>	a) prior to the exercise by these agents of their power to commit the customer they represent in the context of a business relationship or of transactions as referred to in Article 7, § 1, paragraph 1, of the Law ? (Art. 7, § 2, of the Law)	Yes / No / N/A
				2.3.c	Comment :	
				<b>2.4</b>	b) in case of suspicion of money laundering or terrorist financing, where an exemption from customer identification has initially been applied ? (Art. 7, § 2, of the Law)	Yes / No / N/A



	2.4.c	Comment :	
<b>Identity verification of agents</b>	2.5	c) in case of doubt about the veracity of the identification documents ? (Art. 7, § 2, of the Law)	Yes / No / N/A
	2.5.c	Comment :	
	Do your institution's internal procedures stipulate:		
	2.6	a) that the identity verification of the agents of customers, in accordance with Article 7, § 2, of the Law, is subject to the provisions of Articles 7 and 8 of the Regulation? (Art. 13, § 1, paragraph 1 , of the Regulation)	Yes / No / N/A
	2.6.c	Comment :	
	2.7	b) that note must be taken of the powers of attorney granted to the person acting on behalf of the customer and that these powers must be verified by means of documents which may serve as evidence, of which a copy is taken ? (Art. 13, § 1, paragraph 2, of the Regulation)	Yes / No / N/A
2.7.c	Comment :		
<b>Identification of the employees of professional counterparties</b>	Where the customer is a professional counterparty which has authorised its employees to carry out transactions in its name and on its behalf, in accordance with 11° of Article 1 of the Regulation, do your internal procedures provide for their identification :		
	2.8	1/ in accordance with the general rule, by means of their surname, first name, place and date of birth and, to the extent possible, by means of their address ? (Art. 7, § 1, paragraph 3, of the Law)	Yes / No / N/A
	2.8.c	Comment :	
	2.9	2/ or by means of their surname, first name, their rank and the functions they hold in the customer's organisational structure, pursuant to Art. 13, § 2, paragraph 1, of the Regulation) ?	Yes/ No / N/A
	2.9.c	Comment :	
	In the cases referred to in 2/ above, do your institution's internal procedures :		
	2.10	a) provide an exhaustive listing of the categories of professional customers as well as the categories of business relationships or transactions to which these specific rules for the identification and identity verification of the agents can be applied ? (Art. 13, § 2, paragraph 4, of the Regulation)	Yes / No / N/A
	2.10.c	Comment :	
	2.11	b) provide that it must be verified that the counterparties and their transactions do not represent any specific risk of money laundering or terrorist financing ? (Art. 13, § 2, paragraph 1, of the Regulation )	Yes / No / N/A
2.11.c	Comment :		

				<b>2.12</b>	c) require, for each of the customers to whom the specific rules are applied, a justification in writing that these rules are adequate and appropriate, taking account of the risks of money laundering and terrorist financing ? (Art. 13, § 2, paragraph 5, of the Regulation)	Yes / No / N/A
				2.12.c	Comment :	

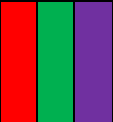
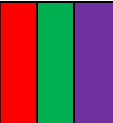
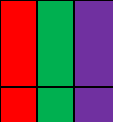
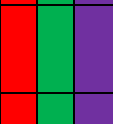
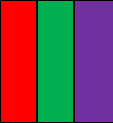
<b>B/S/SF</b>	<b>Ins</b>	<b>PI/EMI</b>	<b>III. IDENTIFICATION OF BENEFICIAL OWNERS</b>			
---------------	------------	---------------	---	--	--	--

			<b>General objectives</b>	<b>3.1</b>	Do you consider that your institution's internal procedures regarding the identification of beneficial owners are fully, largely, partly or insufficiently consistent with the relevant legal and regulatory requirements ?	fully / largely / partly / insufficiently
				3.1.c	Comment :	
				<b>3.2</b>	Do you consider that, in practice, the above-mentioned internal procedures regarding the identification of beneficial owners are fully, largely, partly or insufficiently effectively implemented within your institution ?	fully / largely / partly / insufficiently
				3.2.c	Comment :	
			<b>Beneficial owners of natural person customers</b>	<b>3.3</b>	Where the customer is a natural person, do your institution's internal procedures provide that it must be verified that the customer acts for his own account, and where appropriate, that the third person(s) on whose behalf he acts, must be identified, and that adequate and risk-based measures must be taken in order to verify the identity of these persons ?	Yes / No / N/A
				3.3.c	Comment :	
			<b>Beneficial owners of commercial companies or companies with a commercial form</b>	Where the customer is a commercial company or a company with a commercial form, do your institution's internal procedures prescribe to identify :		
				<b>3.4</b>	a) the natural person(s) who ultimately own or control, whether directly or indirectly, more than 25% of the shares or voting rights ?	Yes / No / N/A
				3.4.c	Comment :	
				<b>3.5</b>	b) the natural person(s) referred to in Articles 5 to 9 of the Companies Code who, although they own or control less than 25% of the shares or voting rights, exert direct or indirect de facto control on the corporate entity ? (Art. 15 of the Regulation)	Yes / No / N/A
				3.5.c	Comment :	
				<b>3.6</b>	c) the natural person(s) who, without having any power to represent the customer in his relations with the institution, hold a mandate within its administrative body ? (Art. 15 of the Regulation)	Yes / No / N/A
				3.6.c	Comment :	

				Do your institution's internal procedures specify the criteria which allow to identify the cases in which a natural person must be qualified as beneficial owner as a result of :	
				<b>3.7</b> a) the de facto control he exerts on the customer company ?	Yes / No / N/A
				3.7.c <i>Comment :</i>	
				<b>3.8</b> b) the significant influence he exerts on the management of the customer company ?	Yes / No / N/A
				3.8.c <i>Comment :</i>	
			<b>Beneficial owners of commercial companies or companies with a commercial form</b>	<b>3.9</b> Do your institution's internal procedures specify the terms and conditions for verifying the information which the customer who is a corporate company has communicated with regard to the identity of his beneficial owners, in order to ascertain its relevance and plausibility, before proceeding to the verification of the identity of these beneficial owners ? (Art. 18, § 1, of the Regulation)	Yes / No / N/A
				3.9.c <i>Comment :</i>	
				<b>3.10</b> Where there are reasons to have doubts about the relevance or plausibility of the information communicated by a customer company in accordance with Article 8, § 3, of the Law, do your institution's internal procedures specify the other adequate and reasonable measures which are required in order to identify the beneficial owners of the customer ? (Art 18, § 2, of the Regulation)	Yes / No / N/A
				3.10.c <i>Comment :</i>	
			<b>Beneficial owners of the other legal entities and legal arrangements without legal personality</b>	Where the customer is a legal entity within the meaning of Article 8, § 1, paragraph 3, 2°), of the Law, other than a corporate company, such as a foundation or a non-profit organisation, or is a trust, fiduciary or any similar legal arrangement, do your institution's internal procedures prescribe to identify :	
				<b>3.11</b> a) where the future beneficiaries have already been determined, the natural person(s) who is (are) the beneficiary(ies) of 25% or more of the property of the legal entity or legal arrangement (Art. 8, § 1, paragraph 3, 2°, a, of the Law)	Yes / No / N/A
				3.11.c <i>Comment :</i>	
				<b>3.12</b> b) where the beneficiaries of the legal entity or legal arrangements have yet to be determined, the class of persons, defined in abstracto, in whose interest the legal entity or legal arrangement has been set up or operates ? (Art. 8, § 1, paragraph 3, 2°, b., of the Law)	Yes / No / N/A
				3.12.c <i>Comment :</i>	
				<b>3.13</b> c) the persons who, without having any power to represent the customer in his relations with the institution, hold mandates in its administrative body or who have the power to have a significant influence on the management ? (Art. 16 and 17 of the Regulation)	Yes / No / N/A
			3.13.c <i>Comment :</i>		

			<b>Beneficial owners with regard to dismembered rights</b>	3.14	In the case of dismembered rights, do your institution's internal procedures prescribe to identify and verify the identity of the beneficial owners of the customers as referred to in Article 19 of the Regulation ?	Yes / No / N/A		
				3.14.c	Comment :			
			<b>Beneficiaries of life insurance policies</b>	3.15	Do your institution's internal procedures provide that, in addition to the identification and identity verification of the beneficial owners of the customer, the identification and identity verification of the persons receiving benefits under life insurance policies must take place at the latest when they assert their right to the payment of the benefits resulting from the policy, and prior to the payment of the latter ? (Art. 20, paragraph 1, of the Regulation)	Yes / No / N/A		
				3.15.c	Comment :			
				3.16	Where the person receiving benefits under a life insurance policy directly contacts your insurance company in order to obtain the payment of the benefit provided for in the policy, without using the services of an insurance intermediary, do your institution's internal procedures prescribe that your institution itself must proceed to his identification and identity verification ? (Art. 20, paragraph 2, of the Regulation)	Yes / No / N/A		
				3.16.c	Comment :			
			<b>Beneficiaries of life insurance policies</b>	3.17	Where the person receiving benefits under a life insurance policy is a corporate company, another legal entity or a legal arrangement, do your institution's internal procedures provide for the obligation to identify the beneficial owners of the person receiving the benefits and to take adequate and risk-based measures in order to verify their identity ?	Yes / No / N/A		
				3.17.c	Comment :			
			<b>Identification and identity verification of the beneficial owners – general rules</b>	3.18	Do your institution's internal procedures provide that the identification data regarding the beneficial owner must cover the surname, first name and, to the extent possible, the place and date of birth, or, in the case referred to in Article 8, paragraph 3, 2°, b, of the Law, the definition in abstracto of the relevant group of persons? (Article 8, § 1, paragraph, 4 of the Law)	Yes / No / N/A		
				3.18.c	Comment :			
				3.19	Do your institution's internal procedures provide for the measures to be taken in order to gather, to the extent possible, relevant information on the beneficial owner's address ? (Article 8, § 1, paragraph 1, of the Law)	Yes / No / N/A		
				3.19.c	Comment :			
				Do your institution's internal procedures stipulate that the <u>identification</u> of the beneficial owners :				
				3.20	a) may be based, in all circumstances, on the sole declaration of the customer ?	Yes / No / N/A		
				3.20.c	Comment :			

B/S/SF Ins P/EMI				3.21	b) may be based on the customer's declaration, but that the latter must be complemented, according to the circumstances, with other additional identification measures ?	Yes / No / N/A		
				3.21.c	Comment :			
				3.22	c) must, in all circumstances, be based on identification measures other than the customer's declaration ?	Yes / No / N/A		
				3.22.c	Comment :			
				3.23	Do your institution's internal procedures define the required measures to <u>verify the identity</u> of the beneficial owners, in accordance with Article 8, § 1, paragraph 4, of the Law, depending on the risk of money laundering and terrorist financing associated with the customer's profile and the nature of the business relationship or the transaction requested by the customer? (Art. 14, paragraph 1, of the Regulation)	Yes / No / N/A		
				3.23.c	Comment :			
				3.24	Where it was impossible to effectively verify the identity of the beneficial owners by applying the measures defined in accordance with Article 14, paragraph 1, of the Regulation, do your institution's internal procedures prescribe to keep a written record of the measures which have nevertheless been effectively implemented for this purpose ? (Art. 14, paragraph 2, of the Regulation)	Yes / No / N/A		
				3.24.c	Comment :			
Exemptions from identification				3.25	Apart from the cases of customer identification exemption as referred to in questions 1.25 to 1.39, do your institution's internal procedures make use of the possibility provided for in Article 11, § 1, 3°, of the Law not to proceed to the identification and identity verification of the beneficial owners of pooled accounts held by notaries or members of another independent legal profession established in Belgium, in another country of the European Economic Area or in an equivalent third country ?	Yes / No / N/A		
				3.25.c	Comment :			
				If so, do your financial institution's internal procedures:				
				3.26	a/ specify the procedures for verifying the conditions listed in Article 11, § 1, 3°, of the Law?	Yes / No / N/A		
Exemptions from identification				3.26.c	Comment :			
				3.27	b/ prescribe to proceed to the identification and identity verification of the beneficial owners of the relevant pooled accounts in accordance with Article 8 of the Law, where a suspicion of money laundering or terrorist financing arises ?	Yes / No / N/A		
				3.27.c	Comment :			
IV. CUSTOMER ACCEPTANCE POLICY								

	<b>General objectives</b>	<b>4.1</b>	Do you consider that your institution's internal procedures on customer acceptance allow to achieve the objectives laid down in Article 26, paragraph 1, of the Regulation fully, largely, partly or insufficiently?	fully / largely / partly / insufficiently
		4.1.c	Comment :	
		<b>4.2</b>	Do you consider that, in practice, the customer acceptance policy defined by the above-mentioned internal procedures is fully, largely, partly or insufficiently effectively implemented within your institution ?	Fully / largely / partly / insufficiently
		4.2.c	Comment :	
	<b>General characteristics</b>	<b>4.3</b>	Is your customer acceptance policy applied in a differentiated manner, depending on whether the customers wish to establish a business relationship or carry out an occasional transaction ?	Yes / No / N/A
		4.3.c	Comment :	
		<b>4.4</b>	Is your customer acceptance policy applied in a differentiated manner in the context of the various activities carried out by your financial institution in relation to the customers, depending on the services or products they request ?	Yes / No / N/A
		4.4.c	Comment :	
	<b>Absence of identification and identity verification</b>	Does your institution's customer acceptance policy subject the authorisation to establish a business relationship or to carry out an occasional transaction to the following conditions :		
		<b>4.5</b>	a) the customer has been identified and his identity has been verified in accordance with the legal and regulatory provisions and internal procedures ?	Yes / No / N/A
		4.5.c	Comment :	
		<b>4.6</b>	b) the customer's possible beneficial owners have been identified and the means required for their identity verification have been implemented in accordance with the internal procedures ?	Yes / No / N/A
		4.6.c	Comment :	
		<b>4.7</b>	c) in the absence of identity verification of the beneficial owners, it is verified whether this circumstance is not such that it unreasonably increases the risk of money laundering or terrorist financing ? (Art. 14, paragraph 2, of the Regulation)	Yes / No / N/A
4.7.c	Comment :			
	<b>Absence of identification and identity</b>	<b>4.8</b>	d) if the customer has provided incorrect or incomplete information on his beneficial owners, it is verified whether there is any reason to believe that by providing such incorrect or incomplete information, the customer has attempted to conceal their identity ? (Art. 18, paragraph 2, of the Regulation).	Yes / No / N/A

verification	4.8.c	Comment :	
	4.9	Do your institution's internal procedures prescribe that the execution of transactions initiated by an agent requires that his identity must first be verified in accordance with the internal procedures ?	Yes / No / N/A
	4.9.c	Comment :	
	4.10	Do your institution's internal procedures take account of the absence of identity verification of the beneficial owners in implementing the customer acceptance policy referred to in chapter 8 of the Regulation ? (Art. 14, paragraph 2, of the Regulation)	Yes / No / N/A
	4.10.c	Comment :	
	4.11	Where the conditions referred to in questions 4.5 to 4.8 are not met, do your institution's internal procedures additionally prescribe that an internal report must be drawn up, in order to be reported to the CTIF-CFI, if necessary, pursuant to Article 25 of the Law? (Art. 18, paragraph 2, of the Regulation)	Yes / No / N/A
	4.11.c	Comment :	
	Financial embargos and assets freezes	4.12	Does your institution's customer acceptance policy provide for a systematic verification as to whether the customers, their agents and their beneficial owners are not listed on the current financial embargo or assets freeze lists?
4.12.c		Comment :	
Do your institution's internal procedures stipulate that the verification referred to in the previous question must be carried out:			
4.13		a) by means of an automated system ?	Yes / No / N/A
4.13.c		Comment :	
4.14		b) or manually ?	Yes / No / N/A
4.14.c		Comment :	
<u>Mandatory risk criteria :</u> 1. Remote identifications	4.15	Does your institution's customer acceptance policy identify as an increased risk criterion the conclusion of a business relationship or the execution of a transaction with a customer who is not physically present at the time of the identification ?	Yes / No / N/A
	4.15.c	Comment :	
	4.16	Do your institution's internal procedures prescribe to take the specific and adequate measures provided for in Article 29 of the Regulation, in order to deal with the increased risk of money laundering or terrorist financing, where the customer or his agent is remotely identified ?	Yes / No / N/A
	4.16.c	Comment :	

					Does your institution's customer acceptance policy identify as an increased risk criterion the fact :
				<b>4.17</b>	a) that the customer is a politically exposed person or a close family member or a person known to be a close assistant of a politically exposed person? Yes / No / N/A
				4.17.c	Comment :
				<b>4.18</b>	b) that an agent of the customer is a politically exposed person or a close family member or a person known to be a close assistant of a politically exposed person ? Yes / No / N/A
				4.18.c	Comment :
				<b>4.19</b>	c) that a beneficial owner of a customer is a politically exposed person or a close family member or a person known to be a close assistant of a politically exposed person ? Yes / No / N/A
				4.19.c	Comment :
					Do your institution's internal procedures prescribe to verify whether the customers, their agents or their beneficial owners are politically exposed persons or close family members or persons known to be close assistants of politically exposed persons, by means of :
				<b>4.20</b>	a) internal lists ? Yes / No / N/A
				4.20.c	Comment :
				<b>4.21</b>	b) external lists or databases, whether public or private ? Yes / No / N/A
				4.21.c	Comment :
				<b>4.22</b>	c) information obtained from the customer ? Yes / No / N/A
				4.22.c	Comment :
				<b>4.23</b>	d) any other sources of information ? Yes / No / N/A
				4.23.c	Comment :
				<b>4.24</b>	Do your institution's internal procedures prescribe to take the specific measures provided for in Article 12, § 3, paragraph 6, of the Law, in order to deal with the increased risk of money laundering or terrorist financing, where the customer, his agent or one of his beneficial owners, is a politically exposed person or a close family member or a person known to be a close assistant of a politically exposed person ? Yes / No / N/A
				4.24.c	Comment :
				<b>4.24.1</b>	Does your institution have correspondent banking relationships or does it intend to enter into such relationships? Yes/ No / N/A
				4.24.1.c	Comment :



		<b>3. correspondent banking</b>	<b>4.24.2</b>	Where your institution has correspondent banking relationships or intends to enter into such relationships, do these relationships include or are they likely to include opening payable-through accounts ?	Yes/ No / N/A	
			4.24.2.c	Comment :		
			<b>4.24.3</b>	Where your institution has correspondent banking relationships or intends to enter into such relationships, does the customer acceptance policy identify as an increased risk criterion the fact that the customer engages in cross-frontier correspondent banking relationships with institutions established in third countries within the EEA?	Yes/ No / N/A	
			4.24.3.c	Comment :		
			Where your institution has correspondent banking relationships with cross-frontier correspondent banks established in third countries within the EEA, or intends to enter into such relationships, do the internal procedures provide for:			
			<b>4.24.4</b>	<ul style="list-style-type: none"> <li>The obligation to gather sufficient information on the corresponding institution to ensure that it is not a shell bank, to fully understand the nature of its business and to determine from publicly available information the reputation of the institution (inter alia to ensure that it is not an institution known to permit its accounts to be used by shell banks) and the quality of its supervision?</li> </ul>	Yes / No / N/A	
			4.24.4.c	Comment :		
			<b>4.24.5</b>	<ul style="list-style-type: none"> <li>The obligation to assess the correspondent institution's anti-money laundering and terrorist financing controls ?</li> </ul>	Yes / No / N/A	
			4.24.5.c	Comment :		
			<b>4.24.6</b>	<ul style="list-style-type: none"> <li>The obligation to base the decision to enter into a business relationship or execute a proposed occasional transaction on a file containing elements which prove that the obligations imposed by Article 12, § 4, of the Law, and the obligation to regularly update this file, have been fulfilled?</li> </ul>	Yes / No / N/A	
			4.24.6.c	Comment :		
			<b>4.24.7</b>	<ul style="list-style-type: none"> <li>The obligation to obtain approval at the appropriate hierarchical level, which has been determined by the internal procedures, before entering into new relationships ?</li> </ul>	Yes / No / N/A	
			4.24.7.c	Comment :		
			<b>4.24.8</b>	<ul style="list-style-type: none"> <li>The obligation to document the respective responsibilities of each institution involved in the relationship ?</li> </ul>	Yes / No / N/A	
			4.24.8.c	Comment :		
			<b>4.24.9</b>	<ul style="list-style-type: none"> <li>With respect to payable-through accounts, the obligation to check whether the respondent institution has verified the identity of and performed ongoing due diligence on customers having direct access to accounts of the correspondent institution and whether it is able to provide relevant information concerning these measures at the correspondent institution's request ?</li> </ul>	Yes / No / N/A	

			4.24.9.c	Comment :	
			Are the above-mentioned specific measures also applicable, depending on the risk, where the correspondent bank is:		
			<b>4.28</b>	a) a credit institution established in a member state of the European Economic Area?	Yes / No / N/A
			4.28.c	Comment :	
			<b>4.29</b>	b) a credit institution established in an equivalent third country?	Yes / No / N/A
			4.29.c	Comment :	
			<b>4.29.1</b>	Do your institution's internal procedures stipulate that the transactions effected by correspondent banks established in third countries must be subject to enhanced due diligence measures?	Yes / No / N/A
			4.29.1.c	Comment :	
			Do your institution's internal procedures stipulate that the transactions effected by correspondent banks established in a member state of the European Economic Area must be subject to		
			<b>4.29.2</b>	<ul style="list-style-type: none"> <li>enhanced due diligence measures? (art. 12, § 4, of the Law)</li> </ul>	Yes / No / N/A
			4.29.2.c	Comment :	
			<b>4.29.3</b>	<ul style="list-style-type: none"> <li>ordinary due diligence measures? (art. 14, § 1, of the Law)</li> </ul>	Yes / No / N/A
			4.29.3.c	Comment :	
			<b>4.29.4</b>	<ul style="list-style-type: none"> <li>simplified due diligence measures? (art. 11, § 1, of the Law)</li> </ul>	Yes / No / N/A
			4.29.4.c	Comment :	
			Does your institution's customer acceptance policy identify as increased risk criteria, the following cases as referred to in Article 27 of the Regulation, i.e. :		
			<b>4.30</b>	a) the request to open numbered accounts or contracts ?	Yes / No / N/A
			4.30.c	Comment :	
			<b>4.31</b>	b) the request to provide asset management services ?	Yes / No / N/A
			4.31.c	Comment :	
			<b>4.32</b>	c) the customer's residence or domicile in a country or territory in respect of which the FATF recommends taking countermeasures or enhanced due diligence measures?	Yes / No / N/A
			4.32.c	Comment :	
			<b>Mandatory risk criteria :</b>		
			<b>4. Criteria referred to in Article 27 of the Regulation</b>		

	<b>4.33</b>	e) the impossibility to verify the identity of the beneficial owners, and/or to identify their place and date of birth, and/or to gather relevant information about their address ?	Yes / No / N/A	
	4.33.c	<i>Comment :</i>		
<b>Specific risk criteria</b>	<b>4.34</b>	Do the internal procedures organise the analysis by your institution of the risks associated with its products, customers, geographic areas of activity and distribution channels, in order to determine specific risk criteria as referred to in Article 26, paragraph 2, of the Regulation ?	Yes / No / N/A	
	4.34.c	<i>Comment :</i>		
	<b>4.35</b>	Has the risk analysis referred to in the previous question been updated in the past 12 months ? (if not, please indicate the date of the last update in the comment.)	Yes / No / N/A	
	4.35.c	<i>Comment :</i>		
	Based on the above-mentioned risk analysis, does your institution's customer acceptance policy apply as increased risk criteria :			
	<b>4.36</b>	a) the geographical remoteness between the customer's residence and the point of contact with the institution which he has chosen ?	Yes / No / N/A	
	4.36.c	<i>Comment :</i>		
	<b>4.37</b>	b) the fact that the customer is a non-resident ?	Yes / No / N/A	
	4.37.c	<i>Comment :</i>		
	<b>Specific risk criteria</b>	<b>4.38</b>	c) the fact that the customer carries on activities in an economic sector which is sensitive to the risk of money laundering or terrorist financing ?	Yes / No / N/A
4.38.c		<i>Comment :</i>		
<b>4.39</b>		d) the fact that the customer is a corporate company where an important part of the capital is represented by bearer shares which can easily change ownership without your institution's knowledge ?	Yes / No / N/A	
4.39.c		<i>Comment :</i>		
<b>4.40</b>		e) the fact that the customer is a trust, a de facto association or any other legal arrangement, the proper knowledge of which requires a more in-depth analysis ?	Yes / No / N/A	
4.40.c		<i>Comment :</i>		
<b>4.41</b>		g) the fact that the customer contacts your institution for products or services which are considered to be exposed to the risk of being used for attempted money laundering or terrorist financing ?	Yes / No / N/A	

		4.41.c	Comment :		
		4.42	h) the fact that the business relationship or intended transaction will involve important cash movements, the origin and destination of which are hard to verify ?		Yes / No / N/A
		4.42.c	Comment :		
		4.43	i) the importance of the asset values presented ?		Yes / No / N/A
		4.43.c	Comment :		
		4.44	j) criteria which allow to take account of the vulnerability of non-profit organisations to being abused for the purpose of terrorist financing ?		Yes / No / N/A
		4.44.c	Comment :		
		4.45	Does your institution's customer acceptance policy apply other specific increased risk criteria than those listed in the previous questions ? (If so, please list them in short in the comment.)		Yes / No / N/A
		4.45.c	Comment :		
		4.46	Where specific risk criteria are identified, does your institution's customer acceptance policy specify the customer due diligence measures which must be taken in the identification and identity verification process ?		Yes / No / N/A
		4.46.c	Comment :		
			Does your institution's customer acceptance policy apply the low risk criteria based on the following customer characteristics :		
		4.47	a) the credit institutions or financial institutions referred to in Article 11, § 1, 1°, of the Law ?		Yes / No / N/A
		4.47.c	Comment :		
		4.48	b) the listed companies referred to in Article 11, § 1, 2°, of the Law ?		Yes / No / N/A
		4.48.c	Comment :		
		4.49	c) the pooled accounts referred to in Article 11, § 1, 3°, of the Law ?		Yes / No / N/A
		4.49.c	Comment :		
		4.50	d) the Belgian public authorities referred to in Article 11, § 1, 4°, of the Law ?		Yes / No / N/A
		4.50.c	Comment :		
		4.51	e) the European public authorities or institutions referred to in Article 11, § 1, 5°, of the Law ?		Yes / No / N/A
		4.51.c	Comment :		

			Does your institution's customer acceptance policy apply the low risk criteria based on the following products :	
			<b>4.52</b> a) the life insurance policies, insurance policies for pension schemes or pensions or superannuations, as referred to in Article 11, § 2, 1° to 3°, of the Law ?	Yes / No / N/A
			4.52.c <i>Comment :</i>	
			<b>4.53</b> b) electronic money under the conditions of Article 11, § 2, 4°, of the Law ?	Yes / No / N/A
			4.53.c <i>Comment :</i>	
			<b>4.54</b> Does your institution's customer acceptance policy consistently combine the mandatory and specific risk criteria in order to define an appropriate risk scale ?	Yes / No / N/A
			4.54.c <i>Comment :</i>	
			Does the risk scale referred to in the previous question result in the distribution of customers between the following risk categories to which requirements of different levels apply :	
			<b>4.55</b> a) customers with a high risk level ?	Yes / No / N/A
			4.55.c <i>Comment :</i>	
			<b>4.56</b> b) customers with a standard risk level ?	Yes / No / N/A
			4.56.c <i>Comment :</i>	
			<b>4.57</b> c) customers with a low risk level ?	Yes / No / N/A
			4.57.c <i>Comment :</i>	
			<b>4.58</b> Does your institution's customer acceptance policy provide for additional subcategories or intermediary categories for the risk-based categorisation of customers ?	Yes / No / N/A
			4.58.c <i>Comment :</i>	



<b>B/S/SF</b>	<b>Ins</b>	<b>P/EMI</b>	<b>V. DUE DILIGENCE IN RESPECT OF TRANSACTIONS AND BUSINESS RELATIONSHIPS</b>		
			<b>Objectives of ongoing due diligence</b>	<b>5.1</b> Do you consider that the mechanisms for ongoing due diligence in respect of transactions and business relationships which are defined by your institution's internal procedures are fully, largely, partly or insufficiently consistent with the requirements set out in Article 14, § 1, of the Law (i.e. that they allow your institution to ensure that the transactions carried out by the customers are consistent with its knowledge of these customers, of their commercial activities or of their risk profiles, and that they allow it to	fully / largely / partly / insufficiently

		examine with particular attention the atypical transactions or the intriguing facts related to money laundering or terrorist financing) ?	
	5.1.c	<i>Comment :</i>	
	<b>5.2</b>	Do you consider that, in practice, the above-mentioned internal procedures regarding ongoing due diligence in respect of transactions and business relationships are fully, largely, partly or insufficiently effectively implemented within your institution ?	fully / largely / partly / insufficiently
	5.2.c	<i>Comment :</i>	
<b>Identification data and customer profile</b>	<b>5.3</b>	Does your institution's system for monitoring business relationships allow to detect the data or information which determine the profiles of the customers (including the identification data and the information referred to in Article 12 of the Regulation) which are no longer up to date, and does it require them to be updated, if necessary ?	Yes / No / N/A
	5.3.c	<i>Comment :</i>	
<b>Due diligence in respect of financial embargos and assets freezes</b>	Does your institution's monitoring system allow to systematically detect the persons and entities which are subject to financial embargo or assets freeze measures according to the current lists, in particular :		
	<b>5.4</b>	a) by verifying whether the existing customers are subject to the updates of these lists or of new current lists?	Yes / No / N/A
	5.4.c	<i>Comment :</i>	
	<b>5.5</b>	b) by comparing the information relating to the customers' counterparties (for example the beneficiaries of insurance policies, the beneficiaries of transfers made by the customers, or the payers of transfers to customers of your institution) with these lists ?	Yes / No / N/A
	5.5.c	<i>Comment :</i>	
<b>System for monitoring the business relationships and transactions</b>	Do your institution's internal procedures provide for the establishment of a first-line or second-line monitoring system consistent with :		
	<b>5.6</b>	a) the mandatory and specific risk criteria of the customer acceptance policy which are determined when entering into a business relationship ?	Yes/ No / N/A
	5.6.c	<i>Comment :</i>	
	<b>5.7</b>	b) the additional risk criteria, taking account – throughout the entire business relationship – of its development and of the transactions carried out by the customer ?	Yes / No / N/A
	5.7.c	<i>Comment :</i>	
<b>First-line monitoring</b>	Are there any written procedures which specify, for the benefit of the agents in charge of first-line monitoring :		
	<b>5.8</b>	a) the appropriate criteria, consistent with the risk criteria applied in the context of the customer acceptance policy, which allow them to determine the atypical transactions which require their special attention ? (Art. 31, paragraph 1, of the Regulation)	Yes / No / N/A
	5.8.c	<i>Comment :</i>	

	5.9	b) the procedure for drawing up and transmitting written reports on atypical transactions to the person responsible for the prevention of money laundering and terrorist financing as referred to in Article 18 of the Law, including the deadlines for their transmission ? (Art. 31, paragraph 3, of the Regulation)	Yes / No / N/A
	5.9.c	Comment :	
	5.10	Have the written procedures for the attention of the agents of your institution who are in charge of the first-line monitoring been updated in the last 12 months ? (If not, please indicate the date of their last update in the comment.)	Yes / No / N/A
	5.10.c	Comment :	
<b>Second-line monitoring</b>	As regards the second-line monitoring system : (Art. 31, paragraph 2, of the Regulation)		
	5.11	a) does it cover all accounts and transactions of the customers (both occasional and regular) ?	Yes / No / N/A
	5.11.c	Comment :	
	5.12	b) is it based on precise and relevant criteria, determined by your institution with due account for, among other things, the characteristics of the services and products it offers and those of the customers to whom it applies, and sufficiently discriminating in order to be able to effectively detect atypical transactions ?	Yes / No / N/A
	5.12.c	Comment :	
	5.13	c) does it allow for a rapid detection of these transactions ?	Yes / No / N/A
	5.13.c	Comment :	
	5.14	d) does it produce written reports ( <b>whether on paper or in electronic format</b> ) which are transmitted to the person responsible for the prevention of money laundering and terrorist financing referred to in Article 18 of the Law, and which describe the atypical transactions detected and the criteria referred to in question b) above, on the basis of which they are regarded as atypical transactions ?	Yes / No / N/A
5.14.c	Comment :		
5.15	e) is it automated ?	Yes / No / N/A	
5.15.c	Comment :		
5.16	f) if the second-line monitoring system is not automated, has your institution decided not to make use of an automated system based on an analysis providing evidence that the nature and the volume of the transactions to be monitored do not require such an automation, and that the human resources needed for the efficiency and speed of response of the non-automated system have been implemented ?	Yes / No / N/A	
5.16.c	Comment :		

Second-line monitoring	5.17	g) if the second-line monitoring system is not automated, has the analysis referred to in question f) above been updated in the last 12 months ? (If not, please indicate the date of its last update in the comment.)	Yes / No / N/A
	5.17.c	Comment :	
	5.18	h) Has the second-line monitoring system been submitted to an initial validation procedure, and is it subject to a periodic review of its relevance in order to adjust it, where necessary, to the development of the activities, the customers or the environment ?	Yes / No / N/A
	5.18.c	Comment :	
	5.19	i) Has your institution carried out, in the last 12 months, a periodic review as referred to in question h) above ? (If not, please indicate the date of the last periodic review in the comment.)	Yes / No / N/A
	5.19.c	Comment :	
Enhanced due diligence	Do your institution's internal procedures provide for the application of enhanced due diligence measures (both first-line and second-line) in the following situations :		
	5.20	a) the customers, agents or beneficial owners have been identified remotely ?	Yes / No / N/A
	5.20.c	Comment :	
	5.21	b) the customers, agents or beneficial owners are politically exposed persons or close family members or persons known to be close assistants of politically exposed persons ?	Yes / No / N/A
	5.21.c	Comment :	
		c) the customers are credit institutions or financial institutions with which your institution maintains a correspondent banking relationship, and which are established :	
	5.22	c.1) in non-equivalent third countries ?	Yes / No / N/A
	5.22.c	Comment :	
	5.23	c.2) in equivalent third countries ?	Yes / No / N/A
	5.23.c	Comment :	
	5.24	c.3) in member states of the European Economic Area ?	Yes / No / N/A
	5.24.c	Comment :	
		d) the customers referred to in Article 27 of the Regulation who may present specific levels of risk, i.e. in the case of :	
	5.25	d.1) numbered accounts or contracts ?	Yes / No / N/A



			5.25.c	Comment :	
			<b>5.26</b>	d.2) the provision of asset management services ?	Yes / No / N/A
			5.26.c	Comment :	
			<b>5.27</b>	d.3) customers having their residence in a country or territory in respect of which the FATF recommends taking countermeasures or enhanced due diligence measures?	Yes / No / N/A
			5.27.c	Comment :	
			<b>5.28</b>	d.4) customers or agents whose identity has been remotely identified by means of a copy of a supporting document which has not been verified in the National Register ?	Yes / No / N/A
			5.28.c	Comment :	
			<b>5.29</b>	d.5) the impossibility to verify the identity of the beneficial owners, and/or to identify their place and date of birth, and/or to gather relevant information regarding their address ?	Yes / No / N/A
			5.29.c	Comment :	
			<b>5.30</b>	Do your institution's internal procedures prescribe to apply enhanced due diligence measures (both first-line and second-line) in situations where the customer acceptance policy has identified specific high risk criteria ?	Yes / No / N/A
			5.30.c	Comment :	
			Do your institution's internal procedures prescribe to apply enhanced due diligence measures (both first-line and second-line) during the business relationship, in case of :		
			<b>5.31</b>	a) unusually large transactions in the light of your institution's knowledge of the customer's profile and the business relationship ? (Art. 32, paragraph 4, of the Regulation)	Yes / No / N/A
			5.31.c	Comment :	
			<b>5.32</b>	b) transfers of funds received for the benefit of customers which are not accompanied by the necessary information on the payer ? (Art 32, paragraph 5, of the Regulation)	Yes / No / N/A
			5.32.c	Comment :	
			<b>5.33</b>	c) customers for whom transactions deemed suspicious by your institution have been reported to the CTIF-CFI ? (Art. 33 of the Regulation)	Yes / No / N/A
			5.33.c	Comment :	
			<b>5.34</b>	d) each time this is considered necessary by your institution on account of circumstances which create a situation of high risk of	Yes / No / N/A

		money laundering or terrorist financing ?	
	5.34.c	Comment :	
	5.35	e) where one or more internal reports regarding a customer have been transmitted by the first-line or second-line monitoring system to the person responsible for the prevention of money laundering and terrorist financing, as referred to in Article 18 of the Law, without these internal reports having given rise to any reporting of a suspicious transaction to the CTIF-CFI ?	Yes / No / N/A
	5.35.c	Comment :	
	5.36	Do your institution's internal procedures provide for the terms and conditions for the careful examination of atypical transactions or intriguing facts detected by the monitoring system, in order to determine whether they give rise to suspicions of money laundering or terrorist financing which might prompt your institution to report them to the CTIF-CFI ? (Art. 14, § 1, of the Law)	Yes / No / N/A
	5.36.c	Comment :	



B/S/SF	Ins	PI/EMI	<b>VI. ELECTRONIC TRANSFERS OF FUNDS</b>			
			<b>General objectives</b>	6.1	Do you consider that your institution's internal procedures and systems regarding electronic transfers of funds are fully, largely, partly or insufficiently consistent with the requirements set out in Regulation (EC) No. 1781/2006 of the European Parliament and of the Council of 15 November 2006 on information on the payer accompanying transfers of funds ?	fully / largely / partly / insufficiently
				6.1.c	Comment :	
				6.2	Do you consider that, in practice, the above-mentioned internal procedures and systems regarding electronic transfers of funds are fully, largely, partly or insufficiently effectively implemented within your institution ?	fully / largely / partly / insufficiently
				6.2.c	Comment :	
			<b>Obligations on the payment service provider of the payer</b>	6.3	In the case of a transfer of funds where the payment service provider of the payee is situated outside the European Economic Area, do your institution's internal procedures and systems prevent this transfer of funds from being carried out if it is not accompanied by complete information on the payer (his name, his address or his place and date of birth, and his account number or a unique identifier) ?	Yes / No / N/A
				6.3.c	Comment :	
				6.4	In the case of batch file transfers from a single payer where the payment service providers of the payees are situated outside the European Economic Area, do your institution's internal procedures and systems prevent the transaction from being carried out if the individual transfers bundled together therein are not accompanied by complete information on the payer, or if the batch file does not	Yes / No / N/A

			contain that information and the individual transfers are not accompanied by the account number of the payer or by a unique identifier ?	
		6.4.c	<i>Comment :</i>	
		6.5	In the case of a transfer of funds where the payment service provider is situated within the European Economic Area, do your institution's internal procedures and systems prevent this transfer of funds from being carried out if it is not accompanied by complete information on the payer (his name, his address or his place and date of birth, and his account number or a unique identifier), or if it is not accompanied by at least the account number of the payer or by a unique identifier ?	Yes / No / N/A
		6.5.c	<i>Comment :</i>	
		6.6	If a transfer of funds where the payment service provider of the payee is situated in the European Economic Area, is accompanied only by the account number of the payer or by a unique identifier, do your institution's internal procedures and systems ensure that complete information on the payer can be made available to the payment service provider of the payee within three working days of receiving such a request from the payment service provider ?	Yes / No / N/A
		6.6.c	<i>Comment :</i>	
		6.7	Do your institution's internal procedures and systems ensure that the information on the payees is checked against the current lists of persons or entities which are subject to financial embargo or assets freeze measures ?	Yes / No / N/A
		6.7.c	<i>Comment :</i>	
		6.8	Do your institution's internal procedures and systems guarantee that the transfers of funds received can be detected, where the fields relating to the information on the payer in the messaging system or the payment and settlement system used to effect the transfer of funds, have not been filled in using the characters or inputs admissible within the conventions of that system ?	Yes / No / N/A
		6.8.c	<i>Comment :</i>	
		6.9	Do your institution's internal procedures and systems provide for the use of filters to detect clearly irrelevant information?	Yes / No / N/A
		6.9.c	<i>Comment :</i>	
		6.10	Do your institution's internal procedures and systems provide for an adequate monitoring of incoming payment transactions in order to detect transfers of funds with incomplete or irrelevant information by conducting an a posteriori probability sampling test ?	Yes / No / N/A
		6.10.c	<i>Comment :</i>	
		6.11	Do your institution's internal procedures and systems allow your institution to identify payment service providers which regularly fail to provide the required information on the payers?	Yes / No / N/A
		6.11.c	<i>Comment :</i>	
		6.12	Do your institution's internal procedures determine the policy to be followed with regard to rejecting transfers of funds, suspending	Yes / No / N/A

**Obligations on the payment service provider of the payee**

		their execution or asking for complete information from the payment service provider of the payers where the transfers of funds received are not accompanied by the required information?	
	6.12.c	<i>Comment :</i>	
	<b>6.13</b>	Do your institution's internal procedures determine the policy to be followed with regard to payment service providers which regularly fail to provide the required information on the payers ?	Yes / No / N/A
	6.13.c	<i>Comment :</i>	
	<b>6.14</b>	Do your institution's internal procedures stipulate that missing or incomplete information on the payer must be considered as a factor in assessing whether the transfer of funds, or any related transaction, is suspicious and whether it must be reported to the CTIF-CFI?	Yes / No / N/A
	6.14.c	<i>Comment :</i>	
	<b>6.15</b>	Do your institution's internal procedures and systems ensure that the information on the payer is checked against the current lists of persons or entities which are subject to financial embargo or assets freeze measures ?	Yes / No / N/A
	6.15.c	<i>Comment :</i>	