

**ANTI-MONEY LAUNDERING QUESTIONNAIRE****Details of Institution**

1. Name of Institution: .....
2. Location / Address of the Head Office: .....
3. Incorporation Number (Attach a copy of Registration/Incorporation Certificate):  
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4. Nature of Business: .....
5. Names of regulatory bodies supervising your Institution: .....
6. License Number (Please attached a copy of license):.....
7. Areas/Location of Operations (State/Regional/Federal/International): .....
8. Is your Institution publicly quoted on any Stock Exchange? If yes, provide the trading name.....
9. Please provide the name(s) and address (es) of the Institution's External Auditors:  
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10. Are you regulated for Money Laundering prevention in all jurisdictions in which you operate? (YES / NO): .....
11. If yes, which is the primary regulator for your Institution that takes responsibility for the regulation of all AML/CFT and KYC activities? .....
12. Has your Institution been fined or received any enforcement action by your regulator for a breach of Anti-Money Laundering Legislation? (YES/NO).....

**12a.** If "YES", then please provide details: .....

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**Product Details**

**13.** Do you verify the identity and perform on-going due diligence on your customers?

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**14.** Are you able to provide relevant customer identification details upon request?

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**15.** Are your products/services approved by your regulatory authority? Please provide URL

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**Ownership Details**

**16.** List the names and addresses of all shareholders with stake holding of 5% or more in your Institution.

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**17.** List the names and addresses of the directors and account signatories of the Institution along with the names under which they do business.

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**18.** List the names and addresses of the directors of any direct or indirect holding company of the Institution along with the names under which they do business.

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**19.** List the names of shareholders and directors of your institution who are Politically Exposed Persons or related/associated with a Politically Exposed Person. (*A Politically Exposed Person is a person who has been entrusted with prominent public functions in Nigeria or foreign countries, and people or entities associated with them*).

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Anti-Money Laundering Questionnaire 2024

**20.** Please provide the name and address of the officer responsible for ensuring your compliance with Anti-Money Laundering regulations.

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<b>AML POLICIES AND PROCEDURES</b>			
	If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.		
<b>I.</b>	<b>General AML Policies, Practices and Procedures:</b>	<b>Yes</b>	<b>No</b>
1	Is the AML compliance program approved by the Institution's board or a senior committee?	Y o	N o
2	Does the Institution have a legal and regulatory compliance program that includes a designated of Officer that is responsible for coordinating and overseeing the AML framework?	Y o	N o
3	Has the Institution developed written policies documenting the processes that they have in place to prevent, detect, and report suspicious transactions?	Y o	N o
4	In addition to inspections by the government supervisors/regulators, does the Institution client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y o	N o
5	Does the Institution have a policy prohibiting accounts/relationship with anonymous persons/numbered accounts?	Y o	N o
6	Does the Institution have a policy prohibiting accounts/relationships with shell companies/Banks? (A shell company is defined as an entity incorporated in a jurisdiction in which it has no physical presence, and which is unaffiliated with a regulated group.)	Y o	N o
7	Does the Institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell companies/Banks through any of its accounts or products?	Y o	N o
8	Does the Institution have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y o	N o
9	Does the Institution have record retention procedures that comply with applicable law?	Y o	N o
10	Are the Institution's AML policies and practices being applied to all branches and subsidiaries of the Institution both in the home country and in locations outside of that jurisdiction?	Y o	N o
<b>II.</b>	<b>Risk Assessment</b>	<b>Yes</b>	<b>No</b>
11	Does the Institution have a risk-based assessment of its customer base and their transactions?	Y o	N o
12	Does the Institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Institution has reason to believe pose a heightened risk of illicit activities at or through the Institution?	Y o	N o
<b>III.</b>	<b>Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	<b>Yes</b>	<b>No</b>
13	Has the Institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y o	N o
14	Does the Institution have a requirement to collect information regarding its customers' business activities?	Y o	N o
15	Does the Institution maintain account with other Banks or relationship with other Institutions?	Y o	N o
16	Does the Institution assess other Institutions' or Banks' AML policies or practices?	Y o	N o

17	Does the Institution have a process to review and, where appropriate, update customer information relating to high-risk client information?	Y o	N o
18	Does the Institution have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y o	N o
19	Does the Institution complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y o	N o
<b>IV.</b>	<b><i>Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</i></b>	<b><u>Yes</u></b>	<b><u>No</u></b>
20	Does the Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y o	N o
21	Where cash transaction reporting is mandatory, does the Institution have procedures to identify transactions structured to avoid such obligations?	Y o	N o
22	Does the Institution screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y o	N o
23	Does the Institution have policies to reasonably ensure that it only operates with correspondent Financial Institution/Banks that possess licenses to operate in their countries of origin?	Y o	N o
<b>V.</b>	<b><i>Transaction Monitoring</i></b>	<b><u>Yes</u></b>	<b><u>No</u></b>
24	Does the Institution have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers' cheques, money orders, etc.?	Y o	N o
<b>VI.</b>	<b><i>AML Training</i></b>	<b><u>Yes</u></b>	<b><u>No</u></b>
25	Does the Institution provide AML training to relevant employees that includes: <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 Institution's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	Y o	N o
26	Does the Institution retain records of its training sessions including attendance records and relevant training materials used?	Y o	N o
27	Does the Institution communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y o	N o
28	Does the Institution employ third parties to carry out some of the functions of the Institution?	Y o	N o
29	If the answer to question 28 is yes, does the Institution provide AML training to relevant third parties that includes: <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 Institution's products and services.</li> <li>• Internal policies to prevent money laundering.</li> </ul>	Y o	N o

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

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<b>Name</b>	
<b>Title</b>	
<b>Signature</b>	
<b>Date:</b>	