

**SCOTIABANK
ANTI-MONEY LAUNDERING (AML) / ANTI-TERRORIST FINANCING (ATF) QUESTIONNAIRE**

Bank's name:

Address:

SWIFT CODE:

Website:

I. Financial Institution Information

1. a) Is your institution (or parent company) a publicly traded institution? Yes No

If yes, on what stock exchange(s) is your institution listed? Please include full listed name and entity's stock symbol below.

Exchange (Full Exchange Name):

Listed Company Name:

Stock Symbol:

If more than one, please list additional Exchange information below:

b) Please provide details of ownership (≥25%). To the best of your knowledge, please list beneficial owners' names and ownership percentage or provide ownership structure. Use an attachment if you need more space.

("Beneficial owner" refers to the natural person(s) who ultimately owns or controls, directly or indirectly, 25% or more of the shares.)

2. a) If the institution is privately held, please provide details of ownership (≥25%). To the best of your knowledge, please list beneficial owners' names and ownership percentage or provide ownership structure. Use an attachment if you need more space.

("Beneficial owner" refers to the natural person(s) who ultimately owns or controls, directly or indirectly, 25% or more of the shares.)

b) Are the shares of your institution evidenced by bearer shares? Yes No

(Bearer shares are defined as Corporation stock certificates which convey ownership to whoever possesses the certificates. Ownership is not recorded on the company's share register or on the certificate itself.)

3. a) Does the FI's country adhere to the recommendations developed by the Financial Action Task Force (FATF)?

b) If the FI's country is not a member of the FATF, please provide the name of the comparable organization to which the FI's country belongs?

4. What is the name of the FI's primary supervisory regulatory body?

II. General AML Policies, Practices and Procedures

YES

NO

5.	Is the FI's AML/ATF compliance program approved by the FI's board or a senior committee?		
6.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML/ATF framework? If "Yes" Please provide the name, position title, mailing address, telephone number and email address of that designated officer:		
7.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
8.	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses its AML/ATF policies and practices on a regular basis?		
9.	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.)		
10.	Does the FI have policies to reasonably ensure that it will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
11.	a) Does the FI provide services to Money Services Businesses? b) If yes, do you prohibit Money Services Businesses that are not registered with the proper local agency or not licensed by the appropriate government body? c) Does the FI prohibit Money Services Businesses that do not have a written AML/ATF program or lacks a designated compliance officer? d) Does the FI require senior management approval of each Money Service Businesses?		
12.	Do you have monitoring controls in place to detect transactions related to unlawful internet gambling?		
13.	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?		
14.	Does the FI have record retention procedures that comply with applicable law?		
15.	Are the FI's AML/ATF 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?		
III. Risk Assessment			
16.	Does the FI have a risk-based assessment of its customer base and their transactions?		
17.	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?		
IV. Know Your Customer, Due Diligence and Enhanced Due Diligence			
18.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or		

operates accounts or conducts transactions?		
19. Does the FI have a requirement to collect information regarding its customers' business activities?		
20. Does the FI assess its FI customers' AML/ATF policies or practices?		
21. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?		
22. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?		
23. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?		
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		
24. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?		
25. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?		
26. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities, including lists of suspected terrorists and/or terrorist organizations? Are all confirmed matches reported to competent authorities? Does this screening include OFAC sanctions where applicable?		
27. 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?		
VI. Transaction Monitoring		
28. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers cheques, money orders, etc?		
29. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? If no, when do you propose to comply?		
VII. AML Training		
30. Does the FI provide AML/ATF training to relevant employees that includes: <ul style="list-style-type: none"> • 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. 		
31. Does the FI retain records of its training sessions including attendance records and relevant training materials used?		
32. Does the FI communicate new AML/ATF related laws or changes to existing AML/ATF related policies or practices to relevant employees?		
33. a) Does the FI employ third parties to carry out some of the functions of the FI?		

<p>b) If yes, does the FI provide AML/ATF training to relevant third parties that includes:</p> <ul style="list-style-type: none"> • 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. 		
VIII. KEY REGULATORY ISSUES		
34. Does the FI maintain its AML/ATF compliance program on an ongoing basis?		
<p>35. Does the FI have processes in place to address risks related to:</p> <p>(a) non-face-to-face business, such as telephone banking and On-line Banking?</p> <p>(b) the use of intermediaries and other third party sources of business, such as Lawyers, trustees, and other persons legally appointed to act on behalf of a third party?</p>		
36. Does the FI offer anonymous accounts, i.e. numbered accounts for which the FI does not have full particulars of the beneficial owner?		
37. Does the FI send wire transfers or issue drafts on behalf of non-customers without obtaining proof of identification?		
38. Does the FI require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses and account numbers in accordance with the FATF 16/Canadian AML requirements?		
39. In relation to cross-border correspondent banking and other similar relationships, does the FI gather sufficient information about a respondent institution to understand its business, reputation, quality of supervision and regulatory history?		
<p>40. a) Does the FI offer Payable Through Accounts?</p> <p>b) If, yes, describe the due diligence requirements the FI has implemented for these accounts.</p> <p>c) Would your institution allow direct access to the correspondent account held with Scotiabank by another financial institution or other third party?</p>		
41. Does the FI have an AML/ATF Statement? If Yes Please attach it.		

Bank's name:		
Completed By (Name & Title):		
Telephone Number		
Email Address		
Signature		Date:

Reviewed by GTB, Documentation Control:		Date:
Comments:		