

ANTI-MONEY LAUNDERING / ANTI-TERRORIST FINANCING QUESTIONNAIRE

**THE BANK OF NOVA SCOTIA
(SCOTIABANK)
TRADE SERVICES & FINANCIAL INSTITUTIONS
100 Yonge Street, 9th Floor
Toronto, Ontario, Canada M5C2W1**

Bank's name: **The Bank of Nova Scotia (SCOTIABANK)**

Address: **44 King Street West, Toronto, Ontario, Canada, M5H 1H1**

SWIFT CODE: **NOSCCATT**

Website: **www.scotiabank.com**

Does your country adhere to the 40 anti-money laundering recommendations and nine special terrorist financing recommendations developed by the Financial Action Task Force (FATF)? **YES**

If your country is not a member of the FATF please provide the name of the comparable organization to which your country belongs?

Canada is a member of the FATF.

What is the name of your supervisory regulatory agency?

Canada's regulatory body is The Office of Superintendent of Financial Institutions (OSFI).

I. General AML Policies, Practices and Procedures	YES	NO
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y	
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework? If "Yes" Please provide their name, position title, mailing address, telephone number and email address: Mr. Ron King, Vice President, Chief Anti-Money Laundering Officer Address: 44 King St. West, Toronto, Ontario, CANADA, M5H 1H1 Telephone: 416-866-6261; Fax: 416-866-4468; E-mail: ron.king@scotiabank.com	Y	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y	
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y	
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	Y	
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y	
8. Does the FI have record retention procedures that comply with applicable law?	Y	
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y	



II. Risk Assessment		YES	NO
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	Y	
11.	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	
III. Know Your Customer, Due Diligence and Enhanced Due Diligence		YES	NO
12.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y	
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	Y	
14.	Does the FI assess its FI customers' AML policies or practices?	Y	
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y	
16.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y	
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y	
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		YES	NO
18.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y	
19.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y	
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y	
21.	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	
V. Transaction Monitoring		YES	NO
22.	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?	Y	
VI. AML Training		YES	NO
23.	Does the FI provide AML 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. 	Y	
24.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y	
25.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y	
26.	Does the FI employ third parties to carry out some of the functions of the FI?		N
27.	If the answer to question 26 is yes, does the FI provide AML training to relevant third parties 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. N/A		



VII. KEY REGULATORY ISSUES	YES	NO
28. Has your institution established and maintain, on an ongoing basis an anti-money laundering/anti-terrorist financing compliance program?	Y	
29. Does the FI have in place provisions to address risks related to non-face-to-face business (telephone banking, On-line Banking, etc.) relationships and the use of intermediaries and other third party sources of business? (Non-face-to-face business meaning telephone banking, On-line Banking, etc.) (Intermediaries and other third party sources of business meaning lawyers representing a customer, people in trust, other individuals legally appointed by the customers to do business on their behalf)	Y	
30. Does your bank offer anonymous accounts, i.e. numbered accounts for which your bank does not have full particulars of the beneficial owner?		N
31. Do you send wire transfers or issue drafts on behalf of non-customers without obtaining proof of identification?		N
32. Does your institution require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses and account numbers?	Y	
33. Does your institution check the names of current and prospective account holders and monitor all transactions against official lists of suspected terrorists and/or terrorist organizations? Are all confirmed matches reported to competent authorities?	Y	
34. In relation to cross-border correspondent banking and other similar relationships, does your institution gather sufficient information about a respondent institution to understand their business, reputation, quality of supervision and regulatory history?	Y	
35. Does your institution offer Payable Through (Clear-Through) Accounts? If, Yes, please provide details of the due diligence requirements your bank has implemented for these accounts.		N

Bank's name: The Bank of Nova Scotia (SCOTIABANK)		
Name: Ron King	Title: Vice President, Chief Anti-Money Laundering Officer	Date: FEBRUARY 10, 2009

