

Financial Institution Name	NIBC Bank N.V.
Address of principal location	Carnegieplein 4 2517 KJ The Hague The Netherlands
Name of regulator	The Dutch Central Bank (“DNB”), The Netherlands Authority for the Financial Markets (“AFM”)
The responses provided below applies to NIBC’s international banking subsidiaries and branches	

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?	Yes	
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?	Yes	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Yes	
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?	Yes	
5. 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.)	Yes	
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?	Yes	
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates?	Yes	
8. Does the FI have record retention procedures that comply with applicable law?	Yes	
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?	Yes	
II. Risk Assessment	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Yes	
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?	Yes	
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?	Yes	
13. Does the FI have a requirement to collect information regarding its customers’ business activities?	Yes	
14. Does the FI assess its FI customers’ AML policies or practices?	Yes	
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes	
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information?	Yes	
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Yes	
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?	Yes	
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	N/A	
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Yes	
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?	Yes	

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

22. 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? <sup>1</sup>	MT 202COV, MT 205 and MT 205COV are not used, only MT202 is used	
<b>V. Transaction Monitoring</b>		
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller's checks, money orders, etc?	Yes	No
<b>VI. AML Training</b>		
24. Does the FI 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 FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Yes	No
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes	
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes	
27. Does the FI employ third parties to carry out some of the functions of the FI?	Yes	
28. 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"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	No, check is made whether AML procedures are in line.	

Name and title of individual completing this questionnaire	Bart Koch Managing Director Legal & Compliance
Signature	
Date	24 April 2017

<sup>1</sup> The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles.

Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg\\_NYCH\\_Statement\\_on\\_Payment\\_Message\\_Standards\\_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale and UBS which aim to develop financial services industry standards, and related products, for Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.