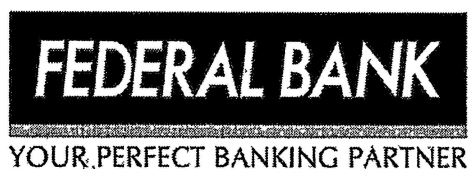


AML CFT Questionnaire 2023



**Prepared and Maintained by
AML Monitoring Department**

GENERAL INFORMATION

Legal Name of Financial Institute	Federal Bank Limited		
Registration Number / Trade License Number	L65191KL1931PLC000368		
Country of Incorporation	India		
Date of Incorporation	23-04-1931		
Registered Complete Address	PO Box 103, Federal Towers, Alwaye, Kerala, 683 101, India		
Central Bank Issued License Number, Issue Date & Expiry Date	License Number	Issue Date	Expiry Date
	TRI/4	11-07-1959	Perpetual
Commercial License Number, Issue Date & Expiry Date	License Number	Issue Date	Expiry Date
	L65191KL1931PLC000368	23-04-1931	Perpetual
Activity	Commercial Banking Activities		
Telephone / Fax Number(s)	+91-484-2634129		
Website Address	www.federalbank.co.iin		
Name & Address of Regulatory Authority	Reserve Bank of India		
Legal Status	Public Limited Company		
Number of Employees	15000+		
Number of Branches in India	1291 Branches and 1 Offshore Branch (IBU - GIFT City)		
Number of Branches outside India	Nil		

Stock Exchange listings	Bombay Stock Exchange National Stock Exchange London Stock Exchange
Name and address of individuals or entities holding 5% or above in the ownership	Nil
Details of Key Personnel	Please refer https://www.federalbank.co.in/key-personnel
Details of Subsidiaries	Fedbank Financial Services Ltd (74%) Federal Operations and Services Ltd (100%)
Name & Contact Details of MLRO	Name: Beena Suzanne Thomas Business email: beenasuzanne@federalbank.co.in Contact Number: +91-484-2634129/2866548 Address: AML Monitoring Department, Old Municipal Building, 1 st Floor, Palace Road, Aluva- 683101, Kerala Designation: Deputy Vice President- I

Regulatory Framework

Particulars	Yes	No
Has your country enacted laws designed to prevent money laundering and terrorism financing?	✓	
Is your institution covered by or subject to such laws?	✓	
Is your country a member of the Financial Action Task Force (FATF)?	✓	

AML / CFT Policies and Procedures

Particulars	Yes	No
Are you subject to AML / CTF laws in your country?	✓	
Does the institution have a legal and regulatory compliance program that includes a designated department / officer that is responsible for coordinating and overseeing the AML / CTF framework?	✓	

Does the institution have an anti-money laundering/counter-terrorism financing program approved by its Board of Directors to prevent money laundering & terrorist financing and the processes that have in place to prevent, detect and report suspicious transactions?	✓	
Does your AML/CTF policy meet the requirements of Risk Based approach of Due Diligence and ensure compliance with applicable AML / CTF regulations?	✓	
Are your institution's policies compliant with the FATF Recommendations 2012?	✓	
Have the AML/CFT policies and procedures been communicated or disseminated to all relevant employees of your institution?	✓	
Does your AML Policy & Procedures require the beneficial owners of corporate customers to be verified in line with the requirements for personal customers (Except any beneficial owners holding less than 25% of the share capital of the relevant corporate)?	✓	
Does the institution 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.)	✓	
Does the institution 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?	✓	
Does the institution have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	✓	
Does your institution have policies against establishing relationships or operating with correspondents or institutions that do not possess licenses in their respective countries?		
Does the institution's AML / CTF policies and procedure applied to all branches and subsidiaries of the institution both in the home country and in locations outside of that jurisdiction?	✓	
Does the institution have record retention policy & procedures that comply with applicable law? If Yes, what is record retention period as per your policy? 5 Years	✓	
Is your institution subject to periodic examination or assessment by government supervisors or regulators for AML/CFT compliance??	✓	
Does your institution have an Internal Auditor or an independent third party that assesses compliance with AML/CFT policies on a regular basis?	✓	
Are there regular reports submitted to senior management or the Board of Directors regarding compliance with your institution's AML/CFT program?		

<p>Do your AML / CTF policy & procedure cover the following critical areas:</p> <ul style="list-style-type: none"> ➤ Customer Acceptance Policy ➤ Customer Identification Procedures ➤ Enhanced Due Diligence for High risk customers ➤ Retention of relevant KYC records and documentation of the transactions ➤ Ongoing Transaction monitoring ➤ Unusual and Suspicious Activity reporting ➤ Sanction Check procedures ➤ Politically Exposed Persons ➤ Prohibit dealings with shell banks or companies 	✓	
<p>Does your institution periodically update its AML/CFT policies and procedures?</p>	✓	

Risk Assessment

Particulars	Yes	No
Does the institution have a risk-based assessment of its customer base, products dealing with, countries dealing with, Delivery channel, UBOs and their transactions?	✓	
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?	✓	
Does your institution have a system or a set of procedures for monitoring, on an ongoing basis, its customers' transactions to ensure that these are consistent with its knowledge of the customer and the customer's risk profile?	✓	
Does your institution require the mandatory identification of customers and the recording of customer information (such as name, nationality, address, telephone number, date of birth, place of birth, occupation, source of funds, type of identification document and the authority that issued it) prior to entering into a business relationship or undertaking any transaction?	✓	
Does the institution complete a risk-based assessment to understand the normal and expected transactions of its customers?	✓	
In case where EDD required on High risk corporate customer(s), does institute obtain and maintain Source of funds, Purpose of transactions and source of wealth (where requires) as per regulatory requirement?	✓	
Does your institution provide Payable Through Accounts service to your clients?		✓
Does your institution offer Downstream Correspondent Clearing/ Nested Account Service to your clients?		✓

KYC – Due Diligence and Enhanced Due Diligence

Particulars	Yes	No
Does the institution has practice & processes for the identification and verification of the customers, beneficial owner(s) and representatives (If Any).	✓	
Does your institution require the mandatory identification of customers and the recording of customer information (such as name, nationality, address, telephone number, date of birth, place of birth, occupation, source of funds, type of identification document and the authority that issued it) prior to entering into a business relationship or undertaking any transaction?	✓	
Does the institute maintain customer profile assigning Unique Identification Number (UIN) to any customer at the time of on boarding after identifying and verifying the required documents where applicable?	✓	
Does the institution require updating KYC profiles of customers on an ongoing basis?	✓	
In case of any Correspondent Relationships, including the relationships with Exchange Companies/ FIs, does your institution require to collect and assess the information regarding AML/ CTF related policies and procedures.	✓	
Does the institution screen customers and transactions against Global Watch list and list provided by the local regulator against individuals, entities, group companies and countries? If yes, please indicate the Sanction lists. UN, OFAC, RBI Lists.	✓	

Reportable Transactions

Particulars	Yes	No
Does the institution have policies and practices for the identification and reporting of transactions that are required to be reported to the regulatory authority(s)?	✓	
Where cash transaction reporting and suspicious activity reporting is mandatory, does the institution have procedures to identify transactions structured to avoid such obligations?	✓	
Do you required by law to report suspicious activities to the local regulators?	✓	

Transaction Monitoring

Particulars	Yes	No
Does the institution have a transaction monitoring system? If Yes, please mention if it is automated or manual? Automated	✓	
Does the institution have a monitoring program for unusual and potentially suspicious activity that covers Foreign Currency exchange, funds transfers and monetary instruments such as traveller's checks, money orders, etc.?	✓	
Does your institution have a system or a set of procedures to detect customers that may possibly be in a list of sanctioned or blacklisted individuals issued by governments and international bodies?	✓	

AML CFT Compliance Training Programs

Particulars	Yes	No
Does your institution provide AML/CTF training to its employees particularly those who work directly with customers or those in areas exposed to money laundering or terrorism financing threats?	✓	
Does your institution employ third parties to carry out some of the Compliance functions?		✓
Does your institution conduct regular refresher training to all employees?	✓	
Does your institution communicate new or updated AML/CFT laws or regulations to relevant employees?	✓	

Additional

Particulars	Yes	No
Does your institution been subject to any investigation, indictment, conviction or civil enforcement related to money laundering and terrorism financing?		✓
In addition to above, does any member of Board of Directors or Senior Management of your institution been subject to any investigation, indictment, conviction or civil enforcement related to money laundering and terrorism financing?		✓
Does your institution have branches in any Sanctioned country(s)?		✓
Does your institution or its subsidiaries have shareholder(s) and directors from sanctioned countries?		✓
Does your institution have any significant changes in ownership or control of the company in the past five years? If Yes, please provide more details.		✓

I / We confirm to the best of our knowledge the validity and accuracy of the information given above. Any changes in the above given information will be notified in writing.

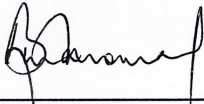
FEDERAL BANK

YOUR PERFECT BANKING PARTNER

I / We confirm that Federal Bank is undertaking KYC/AML measures as per the Standards of Reserve Bank of India on all of our customers respectively wherever applicable.

Name of Authorized Signatory : BEENA SUZANNE THOMAS

Designation of Authorized Signatory: DEPUTY VICE PRESIDENT -I & PRINCIPAL OFFICER (MLRO) UNDER PMLA



Signature of Authorized Signatory

