

**the
Wolfsberg
Group**

Financial Institution Name:
Location (Country):

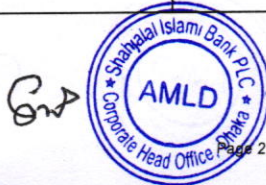
Shahjalal Islami Bank PLC
Bangladesh

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Shahjalal Islami Bank PLC
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	N/A
3	Full Legal (Registered) Address	Shahjalal Islami Bank Tower, Corporate Head Office, Plot-4, Block-CWN (C), Gulshan Avenue, Gulshan, Dhaka- 1212
4	Full Primary Business Address (if different from above)	N/A
5	Date of Entity incorporation/establishment	01.04.2001
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes <input checked="" type="checkbox"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	01. Dhaka Stock Exchange Ltd. 02. Chittagong Stock Exchange Ltd.
6 b	Member Owned/Mutual	No <input checked="" type="checkbox"/>
6 c	Government or State Owned by 25% or more	No <input checked="" type="checkbox"/>
6 d	Privately Owned	No <input checked="" type="checkbox"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	Yes <input checked="" type="checkbox"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	Offshore Banking Unit attached with Gulshan Branch
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No <input checked="" type="checkbox"/>
10	Provide Legal Entity Identifier (LEI) if available	254900MDHN871GDYZ694
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes <input checked="" type="checkbox"/>
11 b	Adverse Information Screening	Yes <input checked="" type="checkbox"/>
11 c	Beneficial Ownership	Yes <input checked="" type="checkbox"/>
11 d	Cash Reporting	Yes <input checked="" type="checkbox"/>
11 e	CDD	Yes <input checked="" type="checkbox"/>
11 f	EDD	Yes <input checked="" type="checkbox"/>



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11 g	Independent Testing	Yes	
11 h	Periodic Review	Yes	
11 i	Policies and Procedures	Yes	
11 j	PEP Screening	Yes	
11 k	Risk Assessment	Yes	
11 l	Sanctions	Yes	
11 m	Suspicious Activity Reporting	Yes	
11 n	Training and Education	Yes	
11 o	Transaction Monitoring	Yes	
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes	
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes	
13 a	If Y, provide further details	S3 compliance for sanction screening, TSS (Transaction Screening Services) from SWIFT for cross border SWIFT message screening, Accuity Online Compliance for Adverse news screening, PEPs screening.	
14	Does the entity have a whistleblower policy?	Yes	
3. ANTI BRIBERY & CORRUPTION			
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes	
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	
17	Does the Entity provide mandatory ABC training to:		
17 a	Board and Senior Committee Management	Yes	
17 b	1st Line of Defence	Yes	
17 c	2nd Line of Defence	Yes	
17 d	3rd Line of Defence	Yes	
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Yes	
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes	
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES			
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
18 a	Money laundering	Yes	
18 b	Terrorist financing	Yes	
18 c	Sanctions violations	Yes	
19	Does the Entity have policies and procedures that:		
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
19 d	Prohibit accounts/relationships with shell banks	Yes	
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes	
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes	
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	

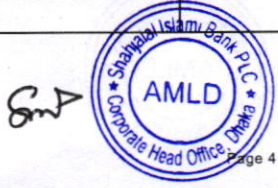
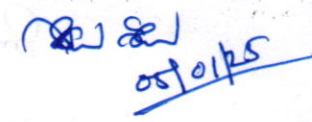


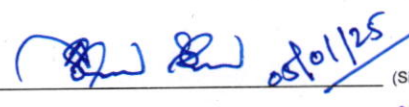
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes	
21 a	If Y, what is the retention period?	5 years or more	
5. KYC, CDD and EDD			
22	Does the Entity verify the identity of the customer?	Yes	
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes	
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
24 a	Customer identification	Yes	
24 b	Expected activity	Yes	
24 c	Nature of business/employment	Yes	
24 d	Ownership structure	Yes	
24 e	Product usage	Yes	
24 f	Purpose and nature of relationship	Yes	
24 g	Source of funds	Yes	
24 h	Source of wealth	Yes	
25	Are each of the following identified:		
25 a	Ultimate beneficial ownership	Yes	
25 a1	Are ultimate beneficial owners verified?	Yes	
25 b	Authorised signatories (where applicable)	Yes	
25 c	Key controllers	Yes	
25 d	Other relevant parties	Yes	
26	Does the due diligence process result in customers receiving a risk classification?	Yes	
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	
28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes	
29 a	If yes, select all that apply:		
29 a1	Less than one year	Yes	
29 a2	1 – 2 years	Yes	
29 a3	3 – 4 years	Yes	
29 a4	5 years or more	Yes	
29 a5	Trigger-based or perpetual monitoring reviews	Yes	
29 a6	Other (please specify)		
30	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?		
30 a	Arms, Defence, Military	Prohibited	
30 b	Correspondent Banks	EDD on risk-based approach	
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	
30 c	Embassies/Consulates	Do not have this category of customer or industry	
30 d	Extractive industries	Do not have this category of customer or industry	
30 e	Gambling customers	Prohibited	
30 f	General Trading Companies	EDD on risk-based approach	
30 g	Marijuana-related Entities	Prohibited	
30 h	MSB/MVTS customers	EDD on risk-based approach	
30 i	Non-account customers		
30 j	Non-Government Organisations	EDD on risk-based approach	
30 k	Non-resident customers	EDD on risk-based approach	



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30 l	Nuclear power	Do not have this category of customer or industry	<input type="checkbox"/>
30 m	Payment Service Provider	Do not have this category of customer or industry	<input type="checkbox"/>
30 n	PEPs	EDD on risk-based approach	<input type="checkbox"/>
30 o	PEP Close Associates	EDD on risk-based approach	<input type="checkbox"/>
30 p	PEP Related	EDD on risk-based approach	<input type="checkbox"/>
30 q	Precious metals and stones	Do not have this category of customer or industry	<input type="checkbox"/>
30 r	Red light businesses/Adult entertainment	Prohibited	<input type="checkbox"/>
30 s	Regulated charities	EDD on risk-based approach	<input type="checkbox"/>
30 t	Shell banks	Prohibited	<input type="checkbox"/>
30 u	Travel and Tour Companies	Do not have this category of customer or industry	<input type="checkbox"/>
30 v	Unregulated charities	Prohibited	<input type="checkbox"/>
30 w	Used Car Dealers	Do not have this category of customer or industry	<input type="checkbox"/>
30 x	Virtual Asset Service Providers	Prohibited	<input type="checkbox"/>
30 y	Other (specify)	N/A	<input type="checkbox"/>
31	If restricted, provide details of the restriction		
6. MONITORING & REPORTING			
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	<input type="checkbox"/>
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	<input type="checkbox"/>
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Transaction Qualified for Cash Transaction Report, Structuring Report, Top Deposit Reports, Daily Activities Reports.	
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	<input type="checkbox"/>
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	<input type="checkbox"/>
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	<input type="checkbox"/>
7. PAYMENT TRANSPARENCY			
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes	<input type="checkbox"/>
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:		<input type="checkbox"/>
37 a	FATF Recommendation 16	Yes	<input type="checkbox"/>
37 b	Local Regulations	Yes	<input type="checkbox"/>
37 b1	If Y, Specify the regulation	Foreign Exchange Regulation Act-1947 (Amendment-2015), Money Laundering Prevention Act-2012 (Amendment-2015) and Anti Terrorism Act-2009 (Amendment 2012 & 2013) , Money Laundering Prevention Rules-2019 , Guidelines for Foreign Exchange Transaction-2018.	
37 c	If N, explain		
8. SANCTIONS			
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	<input type="checkbox"/>
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes	<input type="checkbox"/>

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)	
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)	
41 f	Other (specify)	Local Sanction List (Bangladesh)	
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	
9. TRAINING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:		
43 a	Identification and reporting of transactions to government authorities	Yes	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	
44	Is the above mandatory training provided to :		
44 a	Board and Senior Committee Management	Yes	
44 b	1st Line of Defence	Yes	
44 c	2nd Line of Defence	Yes	
44 d	3rd Line of Defence	Yes	
44 e	Third parties to which specific FCC activities have been outsourced	Yes	
44 f	Non-employed workers (contractors/consultants)	Yes	
10. AUDIT			
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes	
Signature Page			
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)			
Shahjalal Islami Bank PLC _____ (Financial Institution name)			
I, Md. Asadul Islam Khan, EVP & DCAMLCO _____ (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.			
 _____ (Signature & Date)			
