

Financial Institution Name: Bank Vontobel AG

Location: Gotthardstrasse 43, Zurich, Switzerland

Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

I. General AML Policies, Practices and Procedures:	<u>Yes</u>	<u>No</u>
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y X	N <input type="checkbox"/>
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?	Y X	N <input type="checkbox"/>
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y X	N <input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
II. Risk Assessment	<u>Yes</u>	<u>No</u>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	<u>Yes</u>	<u>No</u>
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y X	N <input type="checkbox"/>

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.

13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y X	N <input type="checkbox"/>
14. Does the FI assess its FI customers' AML policies or practices?	Y X	N <input type="checkbox"/>
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? There are no mandatory cash transaction reporting obligations in Switzerland.	Y X	N <input type="checkbox"/>
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y X	N <input type="checkbox"/>
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 X	N <input type="checkbox"/>
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. ¹	Y X	N <input type="checkbox"/>
V. Transaction Monitoring	Yes	No
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y X	N <input type="checkbox"/>

¹ 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/WolfsbergNYCHStatementonPaymentMessageStandards\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/WolfsbergNYCHStatementonPaymentMessageStandards(2007).pdf)

VI. AML Training	Yes	No
24. 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 X	N <input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y X	N <input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y X	N <input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y <input type="checkbox"/>	N X
28. If the answer to question 27 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. 	Y <input type="checkbox"/>	N <input type="checkbox"/>

Space for additional information:
(Please indicate which question the information is referring to.)

Question 19: There are no mandatory cash transaction reporting obligations in Switzerland.

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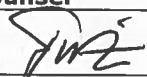
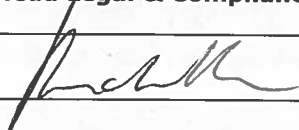
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Name: Enrico Friz	Dr. Sandro Cimichella
Title: Head Legal, Compliance & Tax, General Counsel	Head Legal & Compliance WM
Signature: 	
Date: March 19, 2018	

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