



V N E S H E C O N O M B A N K

STATE CORPORATION «BANK FOR DEVELOPMENT AND FOREIGN ECONOMIC AFFAIRS (VNESHECONOMBANK)»

ANTI-MONEY LAUNDERING QUESTIONNAIRE
for financial institutions

I. Corporate information	
Legal name:	
State Corporation "Bank for Development and Economic Affairs (Vnesheconombank)"	
Address of head office:	
Akademika Sakharova Prospect, 9, Moscow, GSP-6, 107996 Russian Federation	
Resident country:	
The Russian Federation	
Contacts:	
Official in charge of correspondent banking and relationship with financial institutions:	
<i>Name:</i>	Mr.Alexander V. Zelenov
<i>Title:</i>	Director of Financial Institutions Department
<i>Telephone:</i>	+7 495 604 62 34
<i>Fax:</i>	+7 495 721 93 54
<i>E-mail:</i>	corrbanking@veb.ru
<i>Address:</i>	Vnesheconombank, Akademika Sakharova Prospect, 9, Moscow, GSP-6, 107996, Russian Federation
Official in charge of AML/KYC:	
<i>Name:</i>	Mr.Alexander S. Gruzinov
<i>Title:</i>	Director of Security Directorate
<i>Telephone:</i>	+7 495 721 98 67
<i>Fax:</i>	+7 495 721 97 70
<i>E-mail:</i>	Melnik_T_V@veb.ru
<i>Address:</i>	Vnesheconombank, Akademika Sakharova Prospect, 9, Moscow, GSP-6, 107996, Russian Federation
Legal form:	
Vnesheconombank is a state corporation established by the Russian Federation and its status, business purposes and powers are established by the Federal Law "On Bank for Development" of	



17.05.2007 №82-FZ. The only owner of Vnesheconombank is the state of the Russian Federation.

Primary Lines of Business:

Vnesheconombank`s primary lines of business include:

Investment Activity

Export Financing

Treasury Services

Asset Management

Custody Services

Corporate Banking

Executive Board:

Vladimir A. Dmitriev – Chairman;

Nikolay N. Kosov – Member of the Board, First Deputy Chairman;

Anatoly V. Tikhonov– Member of the Board, First Deputy Chairman;

Sergey P. Lykov – Member of the Board, Deputy Chairman;

Mikhail U. Kopeykin – Member of the Board, Deputy Chairman;

Anatoly B. Ballo - Member of the Board, Deputy Chairman;

Petr M. Fradkov - Member of the Board, Deputy Chairman;

Sergey A. Vasilyev - Member of the Board, Deputy Chairman;

Vladimir D. Shaprinskiy – Member of the Board, Chief Accountant;.

II. General AML Practices and Procedures:

1.	Does the FI have a legal and regulatory compliance program that requires approval of the FI's Board or a senior committee thereof?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
2.	Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
3.	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
4.	Does the FI have self-assessment procedures as part of its internal control environment to assure compliance with applicable laws and internal policies?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
5.	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 an annual basis?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
6.	Does the FI have a policy prohibiting accounts/relationships with shell banks?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N



7.	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?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
8.	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
9.	Does the FI have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
10.	Does the FI have a Code of Conduct and representations by their employees of their understanding and agreement to abide by the Code if Conduct including AML provisions?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
11.	Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country? <i>Vnesheconombank has no branches. The subsidiaries of Vnesheconombank are subject to AML legislation for each applicable jurisdiction.</i>	<input type="checkbox"/> Y	<input type="checkbox"/> N
III. Risk Assessment:			
12.	Does the FI have a risk focused assessment of its customer base?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
13.	Does the FI identify the categories of customers whose transactions and banking activities are routine and usual?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
14.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
IV. Know Your Customer Due Diligence and Enhanced Due Diligence:			
15.	Has the FI implemented systems for the identification of its customers, including customer information in case of recorded transactions, account opening, etc. (for example: name, nationality, street address, telephone number, occupation, age/date of birth, number and type of valid official identification, as well as the name of country/state that issued it)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
16.	Does the FI have a requirement to collect information regarding its customer's business activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
17.	Does the FI collect information and assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
18.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
19.	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
20.	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
21.	For legal entities, does the FI obtain copies of the constitutive documents of their customers?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N



V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:

22.	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
23.	Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
24.	Does the FI have automated systems to screen all transactions (originators and beneficiaries) against lists issued by government/international agencies of know or suspected terrorists and narcotics traffickers prior to conducting a transaction?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
25.	Does the FI have policies to ensure that transactions are not conducted with countries that appear as sanctioned entities on lists provided by government/international bodies?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
26.	Does the FI have policies to ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
27.	Does the FI have policies to ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
	<i>Yes, except for the financial institutions without banking license due to their specific status.</i>	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
28.	Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FI that do not comply with industry best practices?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N

VI. Transaction Monitoring:

29.	Does the FI have a monitoring program covering incoming and outgoing funds transfers for suspicious or unusual activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
30.	Does the FI have a monitoring program covering the purchases and redemptions of monetary instruments for suspicious or unusual activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N

VII. AML Training:

31.	Does the FI provide AML awareness training to its employees and agents that includes 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 as well as the process to report suspicious transactions?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
32.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
33.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
34.	Has the FI participated in/attended industry/government AML seminars?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
35.	Does the FI employ third parties to carry out some of the functions of the FI?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N



36. If the answer to question 35 is yes, does the FI provide AML training to relevant third parties that includes:
- 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

N

Financial Institution Name: **State Corporation "Bank for Development and Economic Affairs (Vnesheconombank)"**

Location: **Vnesheconombank, Akademika Sakharova Prospect, 9, Moscow, GSP-6, 107996 Russian Federation**

Name: **Nikolay N. Kosov**

Title: **Member of the Board, First Deputy Chairman**

Signature:

Date: *08.12.2009*