

Newedge Group's- Wolfsberg Group AML Questionnaire

The below responses applies to all Newedge entities/branches. For a complete listing of our branches, please refer to our US Patriot Act Certificate also located at www.Newedgegroup.com.

Anti-Money Laundering Questionnaire		
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?	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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.)	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>

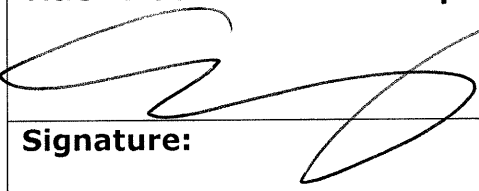
II. Risk Assessment		Yes	No
10.	Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
11.	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
13.	Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
14.	Does the FI assess its FI customers' AML policies or practices?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
15.	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
17.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
19.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
20.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
V. Transaction Monitoring		Yes	No
22.	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 <input checked="" type="checkbox"/>	N <input type="checkbox"/>
VI. AML Training		Yes	No
23.	Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <input type="checkbox"/> Identification and reporting of transactions that must be reported to government authorities. <input type="checkbox"/> Examples of different forms of money laundering 	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

	<ul style="list-style-type: none"> □ involving the FI's products and services □ Internal policies to prevent money laundering. 		
24	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
25	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
26	Does the FI employ 3 rd parties agents to carry out some of the functions of the FI?	Y <input type="checkbox"/>	N <input checked="" type="checkbox"/>
27	<p>If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:</p> <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/A <input checked="" type="checkbox"/>

Question 14 – As a normal business practice, Newedge does not obtain copies of all clients AML policies. Newedge will validate, when appropriate, that relevant clients have processes/controls in place to detect, prevent and report suspicious activity.

Question 19- Newedge Group does not deal in cash.

Question 26- Entities outside of the Newedge Group do not carry out any of our AML functions.

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