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**Financial Institution Onboarding Questionnaire**

**金融机构准入调查问卷**

| **Ref**  **编号** | **Required Information**  **必填信息** | **Response 回复** |
| --- | --- | --- |
| **If your Company is intended to use Airwallex’s services (being foreign exchange service, payment and remittance services) for its own operational purposes, please complete the questions in 1.1-1.7, 2.1-2.13 and 5.1 only.** | | |
| 1 | **Basic Information 基本信息** |  |
| 1.1 | Legal Name of Institution  金融机构法定名称 | Click or tap here to enter text. |
| 1.2 | Incorporation Number and Place of Incorporation  公司注册编号及注册国家/地区 | Click or tap here to enter text. |
| 1.3 | Date of Incorporation 注册日期 | Click or tap here to enter text. |
| 1.4 | License Number (e.g. Money or Financial Services license number)  牌照编号（例如，金融服务牌照编号） | Click or tap here to enter text. |
| 1.5 | Address of Registration & Postcode 注册地址和邮政编码 | Click or tap here to enter text. |
| 1.6 | Business Address & Postcode  公司地址和邮政编码 | Click or tap here to enter text. |
| 1.7 | Main Business (or Nature of Business) & Industry  主营业务（或业务性质）及行业 | Click or tap here to enter text. |
| 1.8 | Registered Capital 注册资本 | Click or tap here to enter text. |
| 1.9 | Office Tel 办公电话 | Click or tap here to enter text. |
| 1.10 | Website address 网址 | Click or tap here to enter text. |
| 1.11 | What year and where was your business first established? 贵司是在哪一年、在哪里成立的？ | Click or tap here to enter text. |
| 1.12 | Is your company Publicly Listed? If yes, please provide the name of the exchange where the institution is listed?  贵司是否是上市公司？如果是，请提供贵司上市的交易所名称？ | Yes ☐ Name of exchange: Click or tap here to enter text.  No ☐ |
| 1.13 | Does your company issue Bearer Shares?  贵司发行无记名股票吗？ | Yes ☐ No ☐ |
| 1.14 | How many employees does your company have?  (Please break this number down by location if relevant)  贵司有多少员工？（请按地点细分） | Click or tap here to enter text. |
| 1.15 | Does your company have subsidiaries or branches in country(ies) other than where your institution is primarily registered and regulated? If yes, please specify the location of the subsidiaries or branches.   贵司是否在注册地和受监管所在国家以外设有子公司或分支机构？如有，请说明子公司或分支机构的地点。 | Yes ☐ No ☐  Please specify: Click or tap here to enter text. |
| 1.15a | If yes for 1.15, are the locations, sanctioned by the United Nations (UN), United States Office of Foreign Assets Control (US OFAC) or European Union (EU), or on the Financial Actions Task Force (FATF) black/grey lists, or own any assets or make any investments into the relevant countries?  如果 1.15 为“是”，则这些地点是否受到联合国 (UN)、美国外国资产控制办公室 (US OFAC) 或欧盟 (EU) 制裁，或列入金融行动特别工作组 (FATF) 黑/灰名单、或在相关国家拥有任何资产或进行任何投资？ | Yes ☐ No ☐  Please specify: Click or tap here to enter text. |
| 1.15b | if yes for 1.15, please specify the country, business information, percentage of revenue generated from the aforesaid relevant countries when compared to your company’s overall revenue.   如果1.15为“是”，请具体说明国家名称、业务信息、上述相关国家的收入占贵公司总收入的百分比。 | Yes ☐ No ☐  Please specify: Click or tap here to enter text. |
| **2** | **Understanding Your Business**  **了解贵司的业务** |  |
| 2.1 | Please provide details of your company’s business model (incl currency corridors, what goods/services/payment services you provide, are you C2C/C2B/B2C/B2B?) and source of funds  请提供贵司业务模式的详细信息（包括利率走廊、提供什么商品/服务/支付服务、C2C/C2B/B2C/B2B吗？）和资金来源 | Click or tap here to enter text. |
| 2.2 | What type of products and services does your company provide to your customers?    贵司向客户提供哪些类型的产品和服务？ | Click or tap here to enter text. |
| 2.3 | Does your company use one or more third parties to provide licensed or regulated services on your behalf (“third party representatives”)?  贵司是否使用第三方机构来提供需要牌照或者受监管的的服务 (“第三方代表机构”)？ | Yes ☐ Please describe: Click or tap here to enter text.  No ☐ |
| 2.3a | If yes for 2.3, please describe the service they performed on your behalf and please describe the function and nature of the third parties.  如2.3答案为“是”，请说明第三方机构为贵司提供的具体服务范围以及说明第三方机构的职能和性质. | Click or tap here to enter text. |
| 2.3b | If yes for 2.3, please provide the consumer base that your third party representatives serve on your behalf. Who are their consumers and where are they based?  请描述贵司的第三方代表机构所服务的客户群（请提供客户类型及所在地） | Click or tap here to enter text. |
| 2.4 | What is the intended relationship with Airwallex? Please describe in detail the products and services you will be using with Airwallex.  与空中云汇之间预期的合作关系是怎样的？请详细描述与空中云汇合作的产品和服务 | Click or tap here to enter text. |
| 2.5 | Please provide reason(s) for intended or performed transactions  请提供预期或已进行交易的目的 | Click or tap here to enter text. |
| 2.6 | Please provide your expected average transaction volume and number of transactions of your customers in a month?    贵司能否提供每月平均交易金额和交易笔数？ | Click or tap here to enter text. |
| 2.7 | Please provide the anticipated monthly turnover and number of transactions conducted via Airwallex.  请提供贵司预期通过空中云汇进行的每月营业额和交易笔数。 | |  | Anticipated Monthly Turnover | | | --- | --- | --- | | Currency | Number of Transactions | Total Amount of Transactions | | CNY |  |  | | USD |  |  | | HKD |  |  | | AUD |  |  | | Others  (Please specify) |  |  | |  | | | |  | 预期每月营业额 | | | 币种 | 交易笔数 | 交易总金额 | | 人民币元 |  |  | | 美元 |  |  | | 港币 |  |  | | 澳元 |  |  | | 其他  （请具体说明） |  |  | |
| 2.8 | How many customers does your company have currently?  贵司目前有多少客户？ | Click or tap here to enter text. |
| 2.9 | Please provide the breakdown of customers by percentages base on your answer in 2.8:  ● by legal entity type e.g. Individual, company, trust, not-for-profit organization  ● by risk rating e.g. high, medium or low  ● by description of merchant industry type/ category  ● by trade volumes, e.g.  which merchant categories are your biggest traders and smallest traders  ● delivery method (e.g. physical branch, online)  请提供依据2.8所列的客户数的按照百分比的细分数据  ● 根据主体类型（例如个人、公司、信托、非营利组织）分类  ● 根据风险等级（例如高风险、中风险或低风险）分类  ● 按对商家行业类型/类别的描述分类  ● 按交易量分类，例如贵司最大的商户和最小的商户属于哪个商家类别  ● 按递送模式分类（比如是通过网络平台还是实体分支机构/柜台） | Click or tap here to enter text. |
| 2.9a | Please confirm whether any customers of your company are Financial Institutions including but not limited to banks, securities firms, insurance companies, brokerage firms, money lenders, money service providers, payment service providers, investment companies, virtual asset companies etc.  请确认贵司的客户是否为金融机构，包括但不限于银行、证券公司、保险公司、经纪公司、放债人、货币服务提供商、支付服务提供商、投资公司、虚拟资产公司等。 | Click or tap here to enter text. |
| 2.9b | Does your company on-board customers non face-to-face (i.e. over the internet, phone, etc.)? If yes, under what scenarios will onboarding of non face to face customers be allowed? (Please also provide the approximate % of customers onboarded face to face vs non face to face)   贵司是否以非面对面方式（即通过互联网、电话等）入驻客户？如果是，在什么情况下允许非面对面客开户？（另请提供面对面与非面对面的客户的大约百分比） | Click or tap here to enter text. |
| 2.10 | Which countries are your customer(s) domiciled in?  (Please provide the % of customers by country)    贵司的客户位于哪些国家？（请提供按国家分类的客户百分比） | Click or tap here to enter text. |
| 2.11 | Does your company limit or restrict which countries your customers are domiciled in?  (If yes please clearly note either the countries where your customer are allowed to be domiciled in or not allowed to be domiciled in)  贵司是否对客户所属国家有限制？  （如果是，请明确说明贵司允许的客户所在国、或者不允许的客户所在国） | Click or tap here to enter text. |
| 2.12 | Does your Company accept physical cash from your customers? (If yes, please describe the process)    贵司向客户收取现金吗？（如有，请描述该过程） | Yes ☐ Please describe: Click or tap here to enter text.  No ☐ |
| 2.13 | Does your Company accept virtual currency from your customers? (If yes, please describe the process)  贵司向客户收取虚拟货币吗？（如有，请描述该过程） | Yes ☐ Please describe: Click or tap here to enter text.  No ☐ |
| 3 | **AML/CTF Policies, Practices and Procedures and other Regulatory Matters**  **反洗钱和反恐融资政策、实践和流程及其他监管事宜** |  |
| 3.1 | Is your Company required to comply with your country's AML/CTF legislation?  贵公司是否必须遵守贵国的反洗钱/跨国犯罪框架法律？  Is your business compliant with all aspects of the AML/CTF rules that are relevant to your business?  贵企业是否遵守了与贵企业相关的反洗钱/打击资助恐怖主义行为规则的所有方面？ | Yes ☐ No ☐  Yes ☐ No ☐ |
| 3.1a | If your Company is not required to comply with any country's AML/CTF legislation, please explain specifics of your business operation that does not require this and has your Company received external legal guidance to confirm that you are not required to comply with the relevant AML/CTF legislation?   如果贵司不需要遵守管辖区的 AML/CTF 法规，请说明您的业务运营中不需要遵守的具体情况。贵司是否收到外部法律指导以确认您无需遵守相关的 AML/CTF 法规？ | Yes ☐ No ☐ |
| 3.2 | Does your company have written AML/CTF Program, policies and procedures? When was your AML/CTF Program, policies and procedures last updated?  贵司是否有书面的反洗钱和反恐融资政策和流程？  贵司的反洗钱和反恐融资政策和流程最后一次更新是何时？ | Yes ☐ Date of last update: Click or tap here to enter text.  No ☐ |
| 3.3 | Are the above policies and procedures applicable to head office, all subsidiaries and branches? If no, please provide a list of the subsidiaries and/or branches that are excluded, including the name and the location of the institutions.   上述政策和流程是否适用于贵司总部、所有子公司和分支机构？如果不是，请提供不适用这些政策或流程的子公司和/或分支机构的列表，包括机构名称和地点 | Yes ☐ No ☐ |
| 3.4 | Are there any designated officers in your company to oversee the activities relating to the prevention and detection of AML/CTF?  If yes, please provide the name, title, contact number of the AML/CTF Officer?    贵司是否有指定的合规官专门负责监测预防反洗钱和反恐融资行为及相关事宜？如果有，请提供该合规官的姓名、职务、联系电话。 | Yes ☐ Please provide details: Click or tap here to enter text.  No ☐ |
| 3.5 | Does your company complete identification and verification of all customers prior to commencing business relationships?  (If the answer is no, please explain in what circumstances and when your company commenced business relationship before completion of identification or verification)   贵司是否在与客户建立业务关系之前完成了对所有客户的身份识别和验证?  (如果不是，请具体说明在什么情况下及什么时间没有完成该等识别和验证） | Yes ☐  No ☐ Please explain: Click or tap here to enter text. |
| 3.6 | Does your company permit the opening of anonymous accounts for customers or permit the opening of accounts by customers whose identity could not be identified or verified?  If yes, please explain under what circumstances and when. If not, please specify the procedures of customer identification and verification.   贵司是否允许为客户开设匿名账户，或者允许身份无法识别或验证的客户开设账户？如果允许，请解释在何种情况下及何时。如果不允许，请说明客户身份识别和验证的流程。 | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.7 | Does your company allow direct use of your account maintained with Airwallex by your customers to transact business on their own behalf? (i.e. payable-through accounts)?   贵司是否允许贵司客户直接使用贵司在空中云汇的账户来代表他们自身进行交易？（即通汇账户）？ | Yes ☐ No ☐ |
| 3.8 | Does your Company have any customers from certain industries that you would consider high risk in AML/CTF? Please state these industries.   贵司是否有任何客户来自贵司认为在反洗钱/反恐融资方面具有高风险的行业？如果有，请说明哪些行业。 | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.9 | How does your Company monitor and identify suspicious activity and how many “Suspicious Activity Reports” have you filed to your regulator over the past 12 months?   贵司如何监控和识别可疑活动？在过去的12个月内贵司向监管机构提交了多少“可疑交易报告”？ | Click or tap here to enter text. |
| 3.10 | Please explain the procedures your Company adopts for on-boarding PEPs. Examples of PEPs include but are not limited to heads of state or government, senior politicians, senior officials in the government, judiciary, or military, senior executives of state owned corporations, and important political party officials  请说明贵司为准入政治敏感人物或其亲属或关系密切人员所采用的流程。政治敏感人物包括但不限于国家元首或政府首脑、资深政治家、政府、司法或军事机关高级官员、国有企业的高级管理人员以及重要的政党官员。 | Click or tap here to enter text. |
| 3.11 | Does your company perform Enhanced Customer Due Diligence on your high-risk customers over the past 12 months? Please describe your Enhanced Customer Due Diligence process and procedures.  在过去 12 个月中，贵司是否对高风险客户进行了 “强化客户尽职调查”？ 请描述贵公司的强化客户尽职调查流程和程序。 | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.12 | Does your company maintain a suspicious transaction monitoring system? Is the transaction monitoring performed manually or automatically?  贵司是否设立了可疑交易监控系统？交易监控是手动或是自动化？ | Yes ☐ No ☐  If Yes, please select, manual ☐ or automatic ☐ transaction monitoring. |
| 3.13 | If using an automated system for suspicious transaction monitoring, please provide the name of the vendor (If the system is purchased from an external vendor). If it is manual, please describe the monitoring method.   如果使用自动化系统，请提供供应商名称（如果系统是从外部供应商订购的）。如果是手动监控，请说明监控方法。 | Click or tap here to enter text. |
| 3.14 | Does your Company perform sanctions screenings on your customers and transactions including the counterparties? If yes, please state which jurisdictions lists you use.   贵司是否对客户、交易（包括交易对手）进行制裁名单的筛查？（如果是，请说明贵司使用的清单） | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.15 | Does your Company conduct ongoing sanctions screening on your customers and the connected parties? If yes, please state the frequency.  贵司是否进行持续制裁审查？ （如果是，请说明贵司使用的制裁扫描频率） | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.16 | Has your company received any regulatory examinations or inspections over the last three years? If yes, please summarise the outcome of the examinations or inspections  贵司在过去三年内是否接受过任何监管审查或检查？ (如果是，请概述检查或者审查结果） | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.17 | Has your company had any regulatory or criminal enforcement or other actions in relation to violation of applicable laws and regulatory guidance including but not limited to anti-money laundering laws or regulations in the past five years?    在过去五年内，贵司是否因违反相关法律或者监管指引（包括但不限于反洗钱法律法规）而被采取了任何监管或刑事执法或其他行动？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.18 | Have you ever had an existing bank account for your company cancelled or suspended due to AML or other concerns? If yes, please provide details of the bank and also why it was cancelled or suspended.  贵司银行账户是否曾经因反洗钱或其他问题而被取消或暂停？（如有，请提供详细的银行信息以及被取消或暂停的原因） | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.19 | Does your company have policies for retaining the customer identity records and transaction records? How long is the retention period?   贵司是否有保留客户身份记录和交易记录的政策？保留期为多长时间？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.20 | Are any of your beneficial owners or ultimate beneficial owners considered as PEPs (e.g. heads of state or government, senior politicians, senior officials in the government, judiciary, or military, senior executives of state owned corporations, and important political party officials)?  贵司是否有任何实益拥有人或最终实际拥有人是政治敏感人物（例如国家元首或政府首脑、资深政治家、政府、司法机构或军队高级官员、国有企业的高级管理人员以及重要的政党官员）？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.21 | Does your company have any business dealings with PEPs?   贵司是否与政治敏感人物有生意往来？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.22 | Is regular anti-money laundering awareness training provided to staff? If yes, please provide details of the training program, including frequency, targeted staff and delivery.   贵司有否向员工定期提供反洗钱意识培训？如有，请提供培训计划的详细信息，包括频率、目标员工和实施情况。 | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.23 | Does your company's risk appetite (prohibited/restricted activities and countries) align with Airwallex's Acceptable Use Policy? If not, what are your controls to identify if any of your clients or transactions are not aligned with Airwallex's risk appetite?  贵公司的风险偏好（被禁止/受限制活动和国家/地区）是否符合空中云汇的可接受使用政策？如果不是，您有哪些控制措施来识别您的客户或交易不符合 空中云汇的风险偏好？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.24 | Is your company able to provide the ID&V information of underlying customers (i.e. payor/ payee) upon request?  贵公司是否能够根据要求提供有关客户（即付款人/收款人）的客户身份识别和验证的信息？ | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| **4.** | **Data Security**  **数据安全** |  |
| 4.1 | Have there been any significant data incidents in the last three years? If yes, please provide details on them  在过去三年内贵司有否发生任何重大数据事故？（如有，请提供详细信息） | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
|  |  |  |
| Approved and signed off by:  填表及其审核人：  (MLRO, executive-level managers including chief executive officer (CEO), chief financial officer (CFO), chief operating officer (COO), director or equivalent), certify that I have read and understood this declaration, that the answers provided in this questionnaire are complete and correct to my honest belief, and that I am authorized to execute this declaration on behalf of the Financial Institution.  （反洗钱合规官, 执行级别的经理，包括首席执行官，首席财务官，首席运营官，公司董事或同等职位），证明我已阅读并理解此声明，问卷提供的答案完整且正确，并已授权我代表金融机构执行此声明。 | | |
| Designation:  职务: | | |
| Signature:  Date:  签名:  日期: | | |

**Appendix 1**   
The below documents will be required to be provided during the onboarding process, subject to the applicable law and regulations of your country:

| **Company Information** | **公司信息** |
| --- | --- |
| ● Certificate of good standing | ● 公司完好存续证明 |
| ● Certificate of incorporation | ● 公司注册证书 |
| ● Article of association | ● 章程 |
| **Ownership and Control Structure** | **所有权和控制结构** |
| ● Company report/Statement of Information | ● 公司报告/信息声明 |
| ● Declaration of ownership chart certified by the Company’s chop or other declarations when necessary | ● 由公司盖章（或者必要时其他形式）证明的所有权架构声明 |
| **Ultimate Beneficial Owner** | **最终实际拥有人** |
| ● National identity card or valid travel document or other relevant documents, data or information provided by a reliable and independent source (e.g. shareholder register, audited annual report, etc.) | ● 身份证或有效的旅行证件，或由可靠且独立的来源提供的其他相关文件、数据或信息（例如股东名册，经审计的年度报告等） |
| **Legal Representative or Person Purporting to Act** | **法人代表或其他被授权人** |
| ● National identity card or valid travel document or other relevant documents, data or information provided by a reliable and independent source (e.g. shareholder register, audited annual report, etc.) | ● 身份证或有效的旅行证件，或由可靠且独立来源提供的其他相关文件、数据或信息（例如股东名册，经审计的年度报告等） |
| **Others** | **其他** |
| ● Audited Financial Statements (Latest) | ● 审计财务报表（最新） |
| ● Internal Audit Reports (Latest) | ● 内部审计报告（最新） |

| **Overview AML/CTF Compliance Program:** | **反洗钱及反恐怖融资合规计划概述：** |
| --- | --- |
| AML/CTF Program   * AML/CTF Policy and procedures including KYC, EDD, KYC refresh, Employee due diligence and training, Transaction monitoring, SAR/STR, Sanctions, PEP handling. * Structure, position title and location of all department heads in Risk and Compliance functions (including CV of key staff of Risk and Compliance) | 反洗钱及反恐怖融资政策包括但不限于   * 客户尽职调查包括但不限于了解您的客户/客户身份识别流程，强化客户尽职调查流程，反洗钱及反恐怖融资员工培训，持续了解您的客户流程，交易监测, 可疑活动报告上报, 制裁扫描政治敏感人物准入流程和客户退出程序等。   + 风险与合规职能部门所有负责人的结构、职务和地点（包括风险与合规部门主要工作人员的简历） |
| ● Copies of all regulatory license or registration | ● 所有监管牌照或登记的复印件 |
| ● Details of any material outsourcing (particularly with respect to Risk or Compliance functions) | ● 任何重大外包的详细信息（尤其是有关风险或合规职能的信息） |
| **Risk Management & governance:** | **风险管理与治理：** |
| ● Anti-Bribery & Corruption Policy and Procedures | ● 反贿赂和腐败政策和流程 |
| ● FATCA & CRS related Policy and Procedure | ● FATCA和CRS相关政策和流程 |
| ● Risk Register | ● 风险名册 |
| ● Customer Complaint Handling Policy & Procedures | ● 客户投诉处理政策和流程 |
| ● Information Security Policy, including PCI-DSS Certificate (where applicable) | ● 信息安全政策，包括PCI-DSS证书（如适用） |
| ● Fraud Risk Policy and Procedures (including any Investigations Policy and Procedures) | ● 欺诈风险政策和流程（包括任何调查政策和程序） |
| ● Breach Reporting Policy and Procedures | ● 违规报告政策和流程 |
| ● Privacy Policy & name of Privacy Officer (or equivalent) | ● 隐私政策和隐私事务管理人员（或同等职位）的姓名 |
| ● Data Retention Policy and Procedures | ● 数据保存政策和流程 |
| ● Data Security Policy and Procedures | ● 数据安全政策和流程 |
| ● Information of any internal Quality Control / Quality Assurance or audit functions | ● 内部质量控制/质量保证或审核职能的信息 |