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**Financial Institution Onboarding Questionnaire**

| If your Company intends to use Airwallex’s services (being foreign exchange service, payment and remittance services) for its **own operational purposes only**, please complete the questions in 1.1-1.7, 2.1-2.13 and 5.1.  Otherwise, please complete **ALL sections**.  This form is required to be approved and signed off by one of the following roles:   * MLRO, * Executive-level managers (CEO, CFO, COO or equivalent) * Registered Director | | |
| --- | --- | --- |

| **Ref** | **Required Information** | **Response** |
| --- | --- | --- |
| 1 | **Basic Information** |  |
| 1.1 | Legal Name of Institution | Click or tap here to enter text. |
| 1.2 | Incorporation Number and Place of Incorporation | Click or tap here to enter text. |
| 1.3 | Date of Incorporation | Click or tap here to enter text. |
| 1.4 | License Number (e.g. Money or Financial Services license number, including type of license) | Click or tap here to enter text. |
| 1.5 | Registration Address and Postcode | Click or tap here to enter text. |
| 1.6 | Business Address & Postcode (Principal place of business) | Click or tap here to enter text. |
| 1.7 | Main Business (or Nature of Business) & Industry | Click or tap here to enter text. |
| 1.8 | Registered Capital | Click or tap here to enter text. |
| 1.9 | Office Tel | Click or tap here to enter text. |
| 1.10 | Website address | Click or tap here to enter text. |
| 1.11 | What year and where was your business first established? | 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? | Yes ☐ Name of exchange: Click or tap here to enter text.  No ☐ |
| 1.13 | Does your company issue Bearer Shares? | Yes ☐ No ☐ |
| 1.14 | How many employees does your company have?  (Please break this number down by location if relevant) | 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. | 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? | 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. | Yes ☐ No ☐  Please specify: Click or tap here to enter text. |
| **2** | **Understanding Your Business** |  |
| 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 | Click or tap here to enter text. |
| 2.2 | What type of products and services does your company provide to your customers? | 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”)? | 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. | 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? | 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. | Click or tap here to enter text. |
| 2.5 | Please provide reason(s) for intended or performed transactions | 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? | Click or tap here to enter text. |
| 2.7 | Please provide the anticipated monthly turnover and number of transactions conducted via Airwallex. | |  | Anticipated Monthly Turnover | | | --- | --- | --- | | Currency | Number of Transactions | Total Amount of Transactions | | CNY |  |  | | USD |  |  | | HKD |  |  | | AUD |  |  | | Others  (Please specify) |  |  | |
| 2.8 | How many customers does your company have currently? | 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) | 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. | 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) | Click or tap here to enter text. |
| 2.10 | Which countries are your customer(s) domiciled in?  (Please provide the % of customers by country) | 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) | Click or tap here to enter text. |
| 2.12 | Does your Company accept physical cash from your customers? (If yes, please describe the process) | 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) | Yes ☐ Please describe: Click or tap here to enter text.  No ☐ |
| 3 | **AML/CTF Policies, Practices and Procedures and other Regulatory Matters** |  |
| 3.1 | Is your Company required to comply with your country's AML/CTF legislation?  Is your business compliant with all aspects of the AML/CFT rules that are relevant to your business? | 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? | 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? | 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. | 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? | 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) | 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. | 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)? | 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. | 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? | 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. | 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. | 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? | 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. | 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. | 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. | 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 | 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? | 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. | 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? | 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)? | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| 3.21 | Does your company have any business dealings with PEPs? | 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. | 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? | 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? | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
| **4.** | **Data Security** |  |
| 4.1 | Have there been any significant data incidents in the last three years? If yes, please provide details on them | Yes ☐ No ☐  Please explain: Click or tap here to enter text. |
|  |  |  |
| I 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 (as Above) to execute this declaration on behalf of the Financial Institution. | | |
| Name:  Role: | | |
| Signature:  Date: | | |

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

**Overview of Company and Beneficial Owners**

* **Company Information**
  + Certificate of good standing
  + Certificate of incorporation
  + Article of association
* **Ownership and Control Structure**
  + Company report/Statement of Information
  + Declaration of ownership chart certified by the Company’s chop or other declarations when necessary
* **Ultimate Beneficial Owner**
  + Valid government-issued photo identity documents, data or information provided by a reliable and independent source (e.g. shareholder register, audited annual report, etc.)
* **Legal Representative or Person Purporting to Act**
  + 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.)
* **Others**
  + Audited Financial Statements (Latest)
  + Internal Audit Reports (Latest)

**Overview of AML/CTF Compliance Program:**

* **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)
  + Copies of all regulatory license or registration
  + Details of any material outsourcing (particularly with respect to Risk or Compliance functions)
* **Risk Management & governance:** 
  + Anti-Bribery & Corruption Policy and Procedures
  + FATCA & CRS related Policy and Procedure
  + Risk Register
  + Customer Complaint Handling Policy & Procedures
  + Information Security Policy, including PCI-DSS Certificate (where applicable)
  + Fraud Risk Policy and Procedures (including any Investigations Policy and Procedures)
  + Breach Reporting Policy and Procedures
  + Privacy Policy & name of Privacy Officer (or equivalent)
  + Data Retention Policy and Procedures
  + Data Security Policy and Procedures
  + Information of any internal Quality Control / Quality Assurance or audit functions