**Airwallex Financial Institutions Onboarding Questionnaire A (Underlying Customers will not be Onboarded by Airwallex)**

| **Ref** | **Required Information** | **Response** |
| --- | --- | --- |
| 1 | **Basic Information** |  |
| 1.1 | Legal Name of Institution |  |
| 1.2 | Incorporation Number and Place of Incorporation |  |
| 1.3 | Date of Incorporation |  |
| 1.4 | License Number (e.g. Money Services license number) |  |
| 1.5 | Address of Registration & Postcode |  |
| 1.6 | Business Address & Postcode |  |
| 1.7 | Main Business (or Nature of Business) & Industry |  |
| 1.8 | Registered Capital |  |
| 1.9 | Office Tel |  |
| 1.10 | Website address |  |
| 1.11 | Are you Publicly Listed? If yes, please provide the name of the exchange where the institution is listed? |  |
| 1.12 | Do you issue Bearer Shares? |  |
| 2 | **Understanding Your Business** |  |
| 2.1 | What year and where was your business first established? |  |
| 2.2 | How many office locations does your company have?  *(Please provide the address for each location)* |  |
| 2.3 | Does your company have subsidiaries or branches in a country/countries other than where your institution is primarily registered and regulated?  If yes, please specify the location of the subsidiaries or branches. |  |
| 2.4 | How many employees does your company have?  (Please break this number down by location if relevant) |  |
| 2.5 | Does your company have any subsidiaries or branches operating in countries that are sanctioned by the United Nations (UN), United States Office of Foreign Assets Control (US OFAC) or European Union (EU) or own any assets or make any investments into those relevant countries? |  |
| 2.6 | If yes, please specify the country, business information, percentage of revenue generated from the aforesaid relevant countries when compared to your company’s overall revenue. |  |
| 2.7 | Does your company have any subsidiaries or branches operating in countries that are classified as high risk and non-cooperative jurisdiction by Financial Actions Task Force (FATF)? |  |
| 2.8 | If yes, please specify the country, business information, percentage of revenue generated from the aforesaid relevant countries when compared to the company’s overall revenue? |  |
| 2.9 | What type of products and services does your company provide to your customers? |  |
| 2.10 | Does your company use one or more third parties to provide licensed or regulated services?  If yes to 2.10, please describe the function and nature of the third parties. What type of roles are they acting on behalf of you? |  |
| 2.11 | Please provide the consumer base of your agents referred to in 2.10 (Who are their consumers and where are they based?） |  |
| 2.12 | How many customers does your company currently have? |  |
| 2.13 | Please provide the breakdown of customers who have accessed your products and services over the past 12 months:   * By legal entity type e.g. Individual, company, trust, not-for-profit organization * by risk rating e.g. percentage that are high, medium or low * by description of merchant industry type/ category * by trade volumes which merchant categories are your biggest traders and smallest traders? * delivery method (e.g. physical branch, online) |  |
| 2.14 | Which countries are your customer(s) domiciled in?  (Please provide the % of customers by country) |  |
| 2.15 | 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) |  |
| 2.16 | Can you provide the average size and number of transactions of your customers in a month? |  |
| 2.17 | Please provide the anticipated monthly turnover and number of transactions conducted via Airwallex.   |  | Anticipated Monthly Turnover | | | --- | --- | --- | | Currency | Number of Transactions | Total Amount of Transactions | | GBP |  |  | | USD |  |  | | EUR |  |  | | Others (Please specify) |  |  | | |
| 2.18 | Can you list out the geographic areas of operation/trade and list the main countries served together with the relevant product/service (e.g., money transmission to Mexico). |  |
| 2.19 | Can you provide the top 10 remittance flow destinations for your customers by value and volume over the past 12 months?  (You may want to provide a separate table or excel document) |  |
| 2.20 | 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) |  |
| 2.21 | Does your company have any customers who are financial institutions including but not limited to banks, money service businesses and payment services providers  (If yes, please provide the details of these customers) |  |
| 2.22 | Do you accept physical cash from your customers?  (If yes, please describe the process) |  |
| 3 | **Anti-Money Laundering (“AML”) and Countering the Financing of Terrorism (“CFT”) Policies, Practices and Procedures** |  |
| 3.1 | Do you believe your business is compliant with all aspects of the AML/CFT Rules that are relevant to your business? |  |
| 3.2 | Does your company have written AML/CFT Program policies and procedures and when was your AML/CFT policies and procedures last updated? |  |
| 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. |  |
| 3.4 | Are there any designated officers in your company to oversee the activities relating to the prevention and detection of ML/TF? If yes, please provide the name, title, contact number of the Money Laundering Reporting Officer? |  |
| 3.5 | Does your company complete identification and verification of all customers prior to commencing business relationships?  (If not, please explain in what circumstances and when) |  |
| 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 not, please specify the procedures of customer identification and verification. |  |
| 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)? |  |
| 3.8 | Do you have any customers from certain industries that you would consider high risk in ML/TF? Please state these industries. |  |
| 3.9 | How do you monitor and identify suspicious activity and how many “Suspicious Activity Reports” have you filed to your regulator over the past 12 months? |  |
| 3.10 | Do you on-board customers that are Politically Exposed Persons (“PEPs”) or who are relatives or close associates of PEPs?  If yes, please explain the procedures you adopt for on-boarding PEPs. Examples of PEPs include but 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 |  |
| 3.11 | Did 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. |  |
| 3.12 | Does your company maintain a suspicious transaction monitoring system? Is the transaction monitoring done manually or automatically?  If using an automated system, please provide the name of the vendor (If the system is subscribed from an external vendor). If manual, please describe the monitoring method. |  |
| 3.13 | Do you perform sanctions screenings on your customers, transactions including the counterparties?  (If so, please state which sanctions jurisdictions list you use) |  |
| 3.14 | Does your company conduct retrospective sanction reviews? |  |
| 3.15 | Did your company receive any regulatory examinations or inspections over the last three years?  (If so, please summarise the outcome of the examinations) |  |
| 3.16 | Has your company had any regulatory or criminal enforcement actions resulting from violations of anti-money laundering laws or regulations in the past five years? |  |
| 3.17 | Have you ever had an existing bank account for your company cancelled or suspended due to AML concerns?  (If yes, please provide details of the bank and also why it was cancelled or suspended) |  |
| 3.18 | Does your company have policies for retaining the customer identity records and transaction records? How long is the retention period? |  |
| 3.19 | Are any of your beneficial owners or ultimate beneficial owners[[1]](#footnote-0) consider 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)? |  |
| 3.20 | Does your company have any business dealings with 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)? |  |
| **4.** | **AML Training** |  |
| 4.1 | 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. |  |
| 4.2 | How is training completion tracked? Is there an escalation process for non-completion of required training? |  |
| 4.3 | Does your company follow a Code of Conduct and are employees required to attest to their understanding of and agreement to abide by the Code, including AML provisions? |  |
| **5.** | **Data Security** |  |
| 5.1 | Have there been any significant data incidents in the last three years?  (If yes, please provide details on them) |  |
| 6. | **Please provide copies of the below documents (if not available, please provide reasons)** |  |
| 6.1 | Customer 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 customer’s chop or other declarations when necessary   Ultimate Beneficial Owner[[2]](#footnote-1)   * 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.)   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 (Last 3 years) * Internal Audit Reports (Last 3 years) |  |
| 7. | **Please provide copies of each of the following items for our assessment to the extent available. If any of them is not available, please provide reasons.** |  |
| 7.1 | **Overview AML/CTF Compliance Program**:   * AML/CFT Program * AML/CFT Policy * Know Your Customer / Customer Identification Procedures * Enhanced Customer Due Diligence Procedures * KYC Refresh Procedures * Copies of all regulatory license or registration * Most recent AML/CTF Risk Assessment Report * AML/CTF Employee Training policy * Employee Due Diligence procedures * Transaction Monitoring (TM) Policy, TM Rule List and TM Procedures * Suspicious Activity Reporting Procedures * Sanctions Policy and Procedures, including a list of the Sanctions lists used for screening * PEP onboarding policy & procedures, plus a copy of the PEP register * Procedures on responding to regulator or law enforcement requests * Customer exit procedures * Structure, position title and location of all personnel in Risk and Compliance functions (including CV of key staff of Risk and Compliance) * Details of any material outsourcing (particularly with respect to Risk or Compliance functions) |  |
| 7.2 | **Risk Management & governance**:   * Anti-Bribery & Corruption Policy and Procedures * FATCA & CRS related Policy and Procedures * 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 |  |

| Completed by: | Approved by: |
| --- | --- |
| Designation: | Designation: |
| Signature:  Date: | Signature:  Date: |

1. an individual who (a) owns or controls, directly or indirectly, including through a trust or bearer share holding, more than 25% of the issued share capital of the corporation; (b) is, directly or indirectly, entitled to exercise or control the exercise of more than 25% of the voting rights at general meetings of the corporation; or (c) exercises ultimate control over the management of the corporation. [↑](#footnote-ref-0)
2. an individual who (a) owns or controls, directly or indirectly, including through a trust or bearer share holding, more than 25% of the issued share capital of the corporation; (b) is, directly or indirectly, entitled to exercise or control the exercise of more than 25% of the voting rights at general meetings of the corporation; or (c) exercises ultimate control over the management of the corporation. [↑](#footnote-ref-1)