

Anti-Money Laundering /Anti- Terrorist Financing Questionnaire

I. Customer Information:

Legal name of Institution: GARANTI BANK S.A.

Principal place of business (address), web address:

5 Fabrica de Glucoza Street, Business Center, Novo Park 3, F Building, 5th-6th Floors, Sector 2, Bucharest, Romania

www.garantibank.ro

Corporate legal form: Joint stock trading company

Registration Number (Fiscal/Unique Code): RO25394008

Banking license: Series I No. 003 dated 17 August 2009

Proof of Incorporation: Trade Registry no. J40/4429/02.04.2009

Name of ultimate parent institution (if applicable): Türkiye Garanti Bankası A.Ş.

Parent Institution's Physical Address:

Nispetiye Mah., Aytar Cad No 2 – Besiktas, Levent, 34340 Istanbul, Turkey

Relationship with parent (agency / branch / subsidiary): Subsidiary

Jurisdiction of licensing authority and regulator of parent: Turkey

Name of Banking Supervision: Banking Regulation and Supervision Agency

Registration/License: 11.04.1946-3/4010 25.04.1946/6291

Authority which issues banking license: Istanbul Chamber of Commerce

Number of branches: domestic, foreign

77 domestic agencies in Romania, no foreign branch

Name of external auditors: Deloitte Audit SRL

Official Authority of reporting in case of suspicion of ML or FT:

National Office for Prevention and Control of Money Laundering

Main Shareholders and their ownership interest (%)

1. G Netherlands B.V. , Netherlands - 99.9954% - in its turn owned by:

➤ Garanti Holding B.V., Netherlands 100% (entirely owned by Türkiye Garanti Bankası A.Ş., Turkey)

2. Garanti Holding B.V , Netherlands - 0.0046%

Executive President & CEO: Murat Atay, General Manager

Has your institution appointed a compliance officer for AML/CFT/KYC?

Name : Irina Oancea, Compliance Director

Phone number : +40 21 208 92 60

e-mail address : ioancea@garantibank.ro

Authorized Officer responsible for the establishment of Correspondent Banking/Account relationship

Adnan Arif Ayman, Financial Institutions Manager

II. General AML Policies, Practices and Procedures		YES	NO
1.	Has the country in which you are located established laws designed to prevent money laundering and terrorism financing?	YES	
2.	Does the law require banks to have written procedures for the prevention of money laundering and terrorism financing?	YES	
3.	Does the FI have a legal and regulatory compliance program that: a. requires approval of the FI's Board or a senior committee thereof? b. 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?	YES YES	
4.	In case your institution does not have such regulations, are they planned to be introduced? Please indicate the estimated date of its implementation.	N/A	
5.	Has your institution been subject of any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorism financing in the past five years?		NO
6.	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?	YES	
7.	Does the FI have a policy prohibiting accounts/ relationships with shell banks?	YES	
8.	Does the FI have a policy prohibiting open or maintain of anonymous accounts?	YES	
9.	Does the FI have policies covering relationships with politically exposed persons, their family and close associates consistent with industry best practices?	YES	
10.	Does the FI have record retention procedures that comply with applicable law?	YES	
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?	YES	
III. Risk Assessment			
12.	Does the FI have a risk based assessment of its customer base and transactions of its customers?	YES	
13.	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?	YES	
14.	Does the FI have proper system put in place to track transactions on the basis of risk classification of countries and do not entertain transactions with high risk categorized countries?	YES	
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 the case of recorded transactions, account opening, etc.?	YES	
16.	Does your AML/CFT/KYC Policies and Procedures require: a. recognizing the true identity of customers and checking their legitimacy before transacting any business with them? b. identifying any third party that makes use of correspondent banking services? c. monitoring client activity to detect suspicious activity and due diligence? d. reporting suspicious activities and transactions to the appropriate AML/CFT/KYC authorities? e. keeping all the records related to customer identification and their transactions? For how long?	YES YES YES YES YES	

17. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES	
18. Does the FI have process to review and, where appropriate, update customer information relating to high risk client information?	YES	
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		
19. Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES	
20. Where cash transaction reporting is mandatory, does your institution have policies and procedures to identify transactions structured to avoid such obligations?	YES	
21. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	YES	
22. Does the FI have policies to reasonably ensure that transactions are not conducted with countries that appear as sanctioned entities on lists provided by government/international bodies?	YES	
23. Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FIs that do not comply with industry best practices?	YES	
VI. Transaction Monitoring		
24. Does your institution have a monitoring program for suspicious or unusual activities that covers funds transfers (incoming and outgoing), and monetary instruments (such as travellers checks, money orders, etc.)?	YES	
VII. AML Training		
25. Does your institution provide AML awareness training to relevant employees?	YES	
26. Does your institution retain records of its training sessions including attendance records and relevant training materials used?	YES	