

**FINANCIAL INSTITUTIONS**
**ANTI-MONEY LAUNDERING & COMBATING TERRORIST FINANCING QUESTIONNAIRE**
**Section I – General Information**

1.	Registered name	Credit Europe Bank (Suisse) S.A.	
2.	Registered address	80, rue du Rhône, 1204 Geneva, Switzerland	
3.	Physical address	80, rue du Rhône, 1204 Geneva, Switzerland	
4.	Swift/Telex	FSUICHGGXXX	
5.	Website	<a href="http://www.crediteurope.ch">www.crediteurope.ch</a>	
6.	Date of establishment	10.11.1987	
7.	Type of activities	Corporate Banking, Trade Finance	
8.	Key geographic areas where the financial institution is active	Turkey and Europe	
9.	Officer responsible for account relationship	Mr. Bülent ILGÜN	
10.	Contact details	<a href="mailto:Financial.institutions@crediteurope.ch">Financial.institutions@crediteurope.ch</a>	
11.	External auditor	KPMG	
12.	Does financial institution have branches and/or subsidiaries?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
13.	Does this questionnaire apply to your head office as well as all your: - national branches? - national subsidiaries? - international branches? - international subsidiaries?	YES <input type="checkbox"/> YES <input type="checkbox"/> YES <input type="checkbox"/> YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>
14.	Registration TIN / UID  Banking license	Registration: CHE-106.209.912  Swiss Financial Market Supervisory Authority FINMA published an official list of all accepted banks:  <a href="https://www.finma.ch/en/~/_media/finma/dokumente/bewilligungstraeger/pdf/beh.pdf?la=de">https://www.finma.ch/en/~/_media/finma/dokumente/bewilligungstraeger/pdf/beh.pdf?la=de</a>	
15.	Commercial registration	Commercial Register of Geneva	
16.	Principal local regulator and AML/CTF competent authority (if not the same)	Swiss Financial Market Supervisory Authority FINMA	
17.	Is financial institution a publicly traded company?  Provide exchanges and listing symbols	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
18.	Is financial institution an agency, branch or subsidiary of a bank? If you answered NO to question 18, please go to Section III.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	If you answered NO to question 13, please provide in the table below the name, location and contact details of the branches and/or subsidiaries that are represented by this questionnaire.		

Name	Location	Contact details
See question 20		

### Section II – Parent Company Information

20.	Please specify type of financial institution's affiliation with your parent company.	Agency <input type="checkbox"/>	Branch <input type="checkbox"/>	Subsidiary <input checked="" type="checkbox"/>
21.	Name of parent company	Credit Europe Bank N.V.		
22.	Registered address	Karpelsdreef 6A, 1100 CJ Amsterdam. The Netherlands		
23.	Physical address	Karpelsdreef 6A, 1100 CJ Amsterdam. The Netherlands		
24.	Swift	FBHLNL2A		
25.	Website	<a href="http://www.crediteurope.nl">www.crediteurope.nl</a>		
26.	Banking licence	License number: Ecm/2007/01017/dys		
27.	Principal local regulator and AML/CTF competent authority (if not the same)	Dutch Central Bank (De Nederlandsche Bank N.V.) and Authority for the Financial Markets (Autoriteit Financiële Markten)		
28.	Is parent company of financial institution publicly traded?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	

### Section III – Ownership and Management Information (to be completed only by entities not listed on regulated markets)

29.	Please list below the full names of all immediate shareholders, each of whom individually directly or indirectly, owns, controls or has 20% or more of shares or voting rights of financial institution.		
	<b>Name</b>	<b>Ownership share (% of total issued capital)</b>	<b>Nature of ownership (direct or indirect)</b>
	Credit Europe Bank N.V.	100%	Direct
30.	Please provide a list of Ultimate Beneficial Owners (UBO) each of whom individually controls 20% or more of shares or voting rights. If no UBO holds 20% or more, please list all UBOs.		
	<b>UBO name and residence address</b>	<b>Level of controlling interest (% of total issued capital)</b>	
	Mr. Hüsnu ÖZYEGIN	99.99%	
31.	Please list names and positions of the members of the Board of Executive Directors. If a branch, please also specify the name of the Chief Executive Officer/General Manager (whether engaged in the branch or elsewhere, e.g. head office).		

	<b>Name</b>	<b>Position</b>	
	Available on our website: <a href="https://www.crediteurope.ch/about-us/corporate-governance/">https://www.crediteurope.ch/about-us/corporate-governance/</a>		
32.	Is parent company of financial institution publicly traded?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
33.	Are there any Politically Exposed Persons (PEPs) associated with your institution?  If YES, please mention full names and details of PEPs involved.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

#### Section IV – Correspondent Relationships

34.	<p>Does financial institution offer correspondent accounts to other domestic or foreign financial institutions?</p> <p>If YES, please list the names, addresses and primary country of domicile of each institution you offer correspondent accounts in the table below.</p> <p>Note: If more than 10, please attach a list with the names, addresses and primary country of domicile of each institution you offer correspondent accounts.</p>	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
-----	---	---	-----------------------------

Name	Address and Country of Domicile
Credit Europe Bank N.V.	Karpeldreef 6A 1100 CJ Amsterdam The Netherlands
Credit Europe Bank (Romania) S.A.	Anchor Plaza Building, B Section 26Z Timisoara Blvd, 6 <sup>th</sup> District Bucharest Romania
Credit Europe Bank Ltd	bld.14, Olimpiyskiy prospect, Moscow, 129090 Russia

#### Section V – General Compliance Queries

35.	Has your institution appointed a designated officer that is responsible for coordinating and overseeing the AML framework?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
36.	Please list the contact details Full name: Shirley CALDWELL Title: Head of Compliance Department Address: 80, rue du Mont-Blanc, 1204 Geneva Switzerland E-mail: <a href="mailto:compliance@crediteurope.ch">compliance@crediteurope.ch</a>		
37.	Does your institution provide financial services to a "shell bank"? ( <i>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 entity that maintains a physical presence.</i> )	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
38.	Does financial institution provide financial services to banks operating under an offshore banking license?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
39.	Does financial institution open and maintain anonymous accounts?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
40.	Does financial institution provide financial services to political and/or public figures (past and present)?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
41.	Has financial institution had any regulatory or criminal enforcement actions resulting from violations of anti-money laundering laws or regulations in the past five years?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
42.	Has financial institution been subject of any investigation, indictment, conviction or civil enforcement action related to financing terrorism in the past five years?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>



## Section VII

**Anti-Money Laundering & Combating Terrorist Financing  
Representation Letter**

<b>Regulatory environment</b>			
43.	Has your country established laws designed to prevent money laundering and terrorist financing?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
44.	Is financial institution subject and fully compliant with such laws?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
45.	Is money laundering and terrorist financing considered a crime in your country?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
46.	Do the laws and regulations in your country prohibit your institution from opening anonymous accounts?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
<b>General AML/CTF Policies, Procedures and Practices</b>			
47.	Does financial institution have the AML/CTF compliance program periodically approved by the financial institution's Board of Executive Directors or a designated committee?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
48.	Does financial institution have written AML/CTF policies and procedures outlining the specific processes that are in place to prevent, detect and report suspicious transactions?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
49.	If YES, please indicate whether your AML/CTF policies and procedures address the following topics.		
	Prohibiting accounts/relationships with shell banks?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Ensuring that the financial institution only enters into relationships with institutions that possess licenses to operate in their countries of origin?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Risk based assessment of customers and their transactions?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Enhanced level of due diligence on those customers identified as having a higher risk profile?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Procedure for the detection and reporting of suspicious transactions?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Indicators helping to identify suspicious transactions?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Adequate AML/CTF – including KYC –related record retention? If yes, how long are records retained?	YES <input checked="" type="checkbox"/> 10 years	NO <input type="checkbox"/>
	Governing relationships with Politically Exposed Persons?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Reviewing the AML/CTF controls of institutions applying for correspondent banking services before opening an account for them?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Providing regular AML/CTF – including KYC – training to relevant staff?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	Clearly defined roles, responsibilities and accountabilities as they relate to AML/CTF compliance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
	50.	Has your institution provided an USA Patriot Act certification to financial institutions in the USA?	YES <input checked="" type="checkbox"/>
51.	Is your USA Patriot Act certification available on the website?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
52.	Are financial institution's policies, procedures and practices being applied to all branches and subsidiaries of the institution both in the home country and in locations outside of that jurisdiction?	YES <input type="checkbox"/>	NO <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

<b>General AML/CTF Policies, Procedures and Practices</b>			
53.	Does financial institution have an internal audit and/or compliance function to test the adequacy of AML/CTF policies and procedures?  Specify the date of the latest check	YES <input checked="" type="checkbox"/>  October 2022	NO <input type="checkbox"/>
54.	Is the compliance with AML/CTF policies and procedures regularly checked by external auditors?  Specify the date of the latest check	YES <input checked="" type="checkbox"/>  March 2022	NO <input type="checkbox"/>
55.	Does the regulator/competent authority conduct AML/CTF reviews of your institution?  With what frequency?	YES <input checked="" type="checkbox"/>  Yearly	NO <input type="checkbox"/>


<b>Know Your Customer, Due Diligence and Enhanced Due Diligence</b>			
56.	Does financial institution employ a customer identification program that is designed to obtain and verify information regarding your customers' true identity, source of wealth, economic activity and the nature of anticipated transactional activity?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
57.	Does financial institution identify the ultimate beneficial owners?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
58.	Does financial institution monitor and review customer information regularly?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
59.	Does financial institution provide a risk assessment of its customer base and their transactions?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
60.	Does financial institution provide appropriate level of enhanced due diligence in relation to customers and transactions that pose an increased risk?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
61.	Does financial institution employ third parties to carry out some of the elements of the customer identification program?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

<b>Transactions Monitoring and Reportable Transactions</b>			
62.	Does financial institution have a system for detecting unusual customer transactions or patterns?  Is this manual or automated?	YES <input checked="" type="checkbox"/>  Automated	NO <input type="checkbox"/>
63.	Does financial institution have policies or practices for the identification of transactions that are required to be reported to the authorities?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
64.	Does financial institution screen customers and transactions against lists of sanctioned persons, entities or countries issued by government/competent authorities?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
65.	Does financial institution employ third parties to carry out screening and/or monitoring activities?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

<b>AML/KYC Training</b>			
66.	Does financial institution provide AML/CTF – including KYC – training to relevant staff that includes: <ul style="list-style-type: none"> <li>• Identification and reporting of transactions that must be reported to competent authorities?</li> <li>• Examples of money laundering and terrorist financing involving the financial institution’s products and services?</li> <li>• Internal procedures to prevent money laundering and terrorist financing?</li> </ul> <p>What is the frequency of such training?</p>	<p>YES <input checked="" type="checkbox"/></p> <p>YES <input checked="" type="checkbox"/></p> <p>YES <input checked="" type="checkbox"/></p> <p>Once a year</p>	<p>NO <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p> <p>NO <input type="checkbox"/></p>
67.	Does financial institution retain records of its training sessions including attendance records and relevant training materials?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
68.	Does financial institution communicate new AML/CTF – including KYC – related laws or changes to existing policies, procedures and practices to relevant staff?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
69.	If you answered YES to question 28 and/or 32, does financial institution provide relevant training on AML/CTF – including KYC – to those third parties?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

**DECLARATION BY MONEY LAUNDERING OFFICER OR DULY AUTHORIZED OFFICIAL**

I, the undersigned, based on my best knowledge and belief, certify that the above referenced questions were answered considering the existing internal controls of my financial institution’s AML/CTF internal controls and financial services activities.

Name: Shirley CALDWELL
Signature: 
Position: Vice President
Date: 29.08.2023
Telephone/Fax: +41 22 839 19 86
E-mail address: <a href="mailto:compliance@crediteurope.ch">compliance@crediteurope.ch</a>