

# AML/CFT Questionnaire for Financial Institutions



Date: DD **20-Jun-2016**

## SECTION 1: INSTITUTION INFORMATION

Name of Institution:	Advanced Bank of Asia Limited		
Country of Incorporation/ Registration:	Cambodia		
Date of Incorporation/ Registration:	29-Dec-2010 (Renew)	Registered No.:	Co. 322KH/1997
Registered Address:	#148, Preah Sihanouk Blvd, Sangkat Boeung Keng Kang I, Khan Chamkarmon, Phnom Penh, Kingdom of Cambodia		
Mailing Address:	#148, Preah Sihanouk Blvd, Sangkat Boeung Keng Kang I, Khan Chamkarmon, Phnom Penh, Kingdom of Cambodia		
SWIFT Code:	ABAAKHPP	E-mail:	info@ababank.com
Telephone No:	+85523225333		
Website:	www.ababank.com		
License No:	14	Date of Issue:	28-Nov-2006
Issuing Authority:	National Bank of Cambodia		

### LIST OF SHAREHOLDERS ( 5% or more of shares)

Name	Country of Incorporation / Nationality	Percentage of Shareholding
Mr. Damir Karassayev	Cambodian	10.00%
National Bank of Canada	Canadian	90.00%

### LIST OF BOARD OF DIRECTORS

Name	Nationality	Position
Mr. Yves Raymond Jacquot	French	Chairman
Mr. Madi Akmambet	Kazakhstan	Executive Director
Mr. Damir Karassayev	Cambodian	Director
Mr. Andre Berard	Canadian	Director
Mr. David Mark Furlong	Canadian	Director
Mr. Dominic Joseph Pierre Jacques	Canadian	Director
Mr. Henri Antoine Jules Jean-Marie Calvet	French	Independent Director
Mr. Étienne Michel Roland Marie Chenevier	French	Independent Director

### LIST OF SENIOR MANAGEMENT

Name	Nationality	Position
Mr. Askhat Azhikhanov	Kazakhstan	Chief Executive Officer

Mr. Lee Young Ho	Korean	Deputy Chief Executive Officer
Mr. Babu Ram Gyawali	Nepalese	Chief Financial Officer
Mr. Galymzhan Temirov	Kazakhstan	Chief Technology & Infrastructure Development Officer
Mr. Bibhu Pandey	Nepalese	Chief Credit Officer
Mr. Zokhir-Rasulov	Uzbekistan	Chief Digital Officer
Mr. Sanzhar Abdullayev	Kazakhstan	Chief Card & E-banking Officer
Mr. Polin Mey	Cambodian	Chief Business Development Officer
Mr. Zhiger Atchabarov	Kazakhstan	Chief International Relations Officer
Ms. Adel Leilanie Legarta	Filipino	Chief Client Relationship Officer
Ms. Phanith Long	Cambodian	Chief Cash Operating Officer

## SECTION 2: LAWS & REGULATIONS

Please answer all questions below by ticking ✓ on "Yes" or "No" box

Yes No

1. Does your country follow recommendations from Financial Action Task Force (FATF)? Please list down in below box for any recommendations which are not implemented, if any.

2. Has your institution been warned, reprimanded, or publically considered in respect of any breaches of AML/CFT law? If 'Yes', what were the circumstances?

## SECTION 3: GENERAL AML/CFT POLICIES, PROCEDURES & GUIDELINES

3. Does the institution have AML/CFT policies, procedures and guidelines in place, and approved by senior management? If "Yes", please provide use with a copy.

4. Do the institution's AML/CFT policies and procedures apply to all your branches and subsidiaries both in the home country and in locations outside of your home country?

5. Is implementation of AML/CFT policies and procedures monitored and reviewed on a permanent basis? If 'Yes', please explain how frequent are your policies reviewed?

**The implementation of AML/CFT policies are monitored and reviewed on a permanent basis. The frequency of review is once a year or as often as required.**

6. Does your compliance program include establishing policies, procedures and processes for managing Economic & Trade Sanctions? If 'Yes', please indicate the Sanctions program(s) incorporated in your compliance program:

OFAC  United Nations  European Union  Others (Please specify) **French List**

7. Does your institution allow fund transfer to/from sanction countries impose by UNSC or OFAC? If 'Yes', how do you ensure compliance with such laws or requirements?

**ABA Strictly prohibits all relationship with sanction countries as per article 33 of the Prakas of the National Bank of Cambodia No. B7-08-089 as of 30 May 2008.**

## SECTION 4: INTERNAL CONTROL - KNOW YOUR CUSTOMER/CUSTOMER DUE DILLIGENCES

Please answer all questions below by ticking ✓ on "Yes" or "No" box

Yes No

8. Do your KYC/CDD policies and procedures require to:

a) Identify and verify the identity of customers?

- b) Identify and verify beneficial ownership and control of such transactions?
- c) Obtain information on the purpose and intended nature of the business relationship/transaction?
- d) Conduct on-going due diligence and scrutiny to ensure the information provided is updated and relevant?
- e) Monitor customers' activities to detect suspicious transactions?
- f) Conduct enhanced due diligence for high risk customers such as PEPs, unregulated industries, etc.?
- g) Keep all the records pertinent to customers' identifications and transactions?

If answered 'Yes' to Question 8(g), for how long are those records kept?

How often do you review and update the information collected?

9. Does your institution rely on due diligence performed by other financial institutions? If 'Yes', under which circumstances?
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10. Do your AML KYC/CDD policies and procedures allow:
- a) Opening or maintaining anonymous accounts?
  - b) Conducting business with banks having no physical presence (i.e. shell banks)?

11. Does the bank provide correspondent services to Offshore Banks, Internet Banking based institutions or banks located in high risk areas as highlighted by FATF in its latest public statement? If 'Yes', please explain your control.
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12. Does your institution have suspicious transaction monitoring system in place? If 'Yes', how does it work?
- Manually     Automatically     Other

Please indicate average number of red-flag transaction per month

13. Does the institution assess the level of AML/CFT risk on its new products and services and design tools to mitigate those risk?

14. Do you include originator information and the purpose of transaction with outgoing wire transfer?

**SECTION 5: OTHER AML/CFT PROGRAM**

Please answer all questions below by ticking  on "Yes" or "No" box

15. Does the institution provide AML/CFT training to employees?
- If 'Yes', do all levels of employees require attending? Please specify how the trainings are conducted.

**All level of front line staff are required to attend face-to-face training at least once year. The content of the training are separated and depends on staff's knowledge, experience, their roles and responsibilities. For new staff, trainings provided within first month of employment. The Bank provides additional trainings, beyond above schedule if circumstances require to do so.**

How does your institution assess the staff's knowledge on the training conducted?

**All trainings are followed by paper-based assessment while all of them are required to pass a certain score, and if not, they need to attend another training or special session will be conducted for them.**

16. Does your institution employ third parties to carry out some of the functions of the institution(e.g. payment transactions)?

If 'Yes', does your institution provide AML/CFT training to the relevant third parties?

 

(Please specify the name of the third parties)

**Pay&Go Sea (Cambodia) Co.,Ltd, Smart Axiata Co., Ltd**

17. Does your institution's AML/CFT policy protect employees, if they, in good faith, report a suspicious transaction?

 

18. Has your institution developed an Internal Audit function in order to test the system for prevention of ML/FT and review your institution's AML/CFT Compliance Policy and program?

 

If 'Yes', how frequent is a review conducted?

**Annually**

19. Does the bank participate in FATCA project?

 

If 'Yes', please provide us with the status and GIIN number.

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#### SECTION 6 (TO BE FILLED BY COMPLIANCE OFFICER)

**Disclaimer.** I, the undersigned, confirm that the information provided in this questionnaire is current and accurate. I also confirm that I am duly authorized to complete and sign this questionnaire on behalf of our institution.

Name: **THIEN HANGSOBANDIT**

Title: **COMPLIANCE MANAGER**

E-Mail: **thien.hangsobandit@ababank.com**

Phone No: **+855 98 630 258**

Fax No: **+855 23 216 333**

Address: **#148, Preah Sihanouk Blvd, Sangkat Boeung Keng Kang I, Khan Chamkarmon, Phnom Penh, Kingdom of Cambodia**



Signature & Stamp