

Anti-Money Laundering Questionnaire

(Must be completed by Correspondent Banks)

Section I – General Information

Legal Name of Institution	IDBank CJSC			
Legal Form	Closed Joint Stock Company			
SWIFT Address / Website	http://www.IDBank.am/			
Principal Place of Business (Address)	13 Vardanants str., Yerevan, RA			
Registered at / Banking License issuing authority date and number	Central Bank of RA, 01.10.1991, 9			
Does your Institution maintain a physical presence¹ in the licensing country?				
			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Indicate the Countries where your company have branches/ daughter companies/ representatives?			Armenia	
If your institution is an agency, branch or subsidiary of a bank with a physical presence, please answer the following questions:				
• Name of affiliate / parent company :				
• Licensing country of affiliate / parent company :				
• Indicate affiliation: <input type="checkbox"/> agency <input type="checkbox"/> branch <input type="checkbox"/> subsidiary				
• Is affiliate / parent company publicly traded? <input type="checkbox"/> Yes <input type="checkbox"/> No				
• If yes, list exchanges and symbols:				
Is your institution a publicly traded entity?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
• If yes, please list the exchanges & symbols: Add text here				
Owners ²	Name (Please attach additional sheets if necessary)	Ownership (%)	In case the owner is a juridical entity	
			Shareholders	Ownership (%)
	CreditBank S.A.L	40,3166151%	Mr. Tarek Joseph Khalifeh	0.32

¹ Physical presence means your institution maintains a physical place of business, other than an electronic address, in a country where it is authorized to conduct banking activities, at which it employs at least one employee on a full-time basis and maintains records of its banking activities, and is subject to supervision by the regulators of the country authorizing the institution's license.

² For purposes of this questionnaire, an "owner" is any person or juridical entity that, directly or indirectly, owns controls or has voting power of ten percent (10%) or more of any class of securities of your institution.

			Messrs. Financial Trust Participation Holding SAL	48.59
			Messrs. Holfiban Sal Holding	10.29
			Mrs. Maria Joseph Khalifeh Bazerji	4.69
			Messrs Financial Profile Holding SAL	20.00
			Messrs. Mernosa Holding SAL	10.00
			Mr. Ramzi Rachid Haidar	6.00
			Mr. Salah Fouad Zoghby	0.09
			Mr Demianos Fares Kattar	0.008
			Mr. Henri Joseph Chaoul	0.008
			Albert Roger Letayf	0.005
	FISTOCO LTD	59,6833849%	Vardan Dilanyan	100
Ultimate beneficial owner³	Name		Nationality	Beneficial owner's interest (%)
	Vardan Dilanyan		Russian Federation	59.6
Board members & Directors	Name (Please attach additional sheets if necessary)		Position	
	Vardan Dilanyan		Chairman of the Council	
	Karen Margaryan		Member of the Council	
	Maksim Morozov		Member of the Council	
	Aleksandr Khachatryan		Member of the Council	
	Mazen A. Shehayeb		Member of the Council	
	Mher Abrahamyan		Chairman of the Management Board	

³ Ultimate beneficial owner is any individual that directly and/or indirectly owns, controls or has voting power of 10% or more of share or any class of securities of the institution

	Ruben Melikyan	Deputy Chairman of the Management Board, Financial Director, Member of the Management Board
	Karen Nalbandyan	Business Development Director, Member of the Management Board
	Vardan Gevorgyan	Retail Banking Director, Member of the Management Board
	Anushik Khachatryan	Chief accountant, Member of the Management Board
	Rafik Suvaryan	Risk Management Director, Member of the Management Board
	Arman Asatryan	Operational Director, Member of the Management Board
	Sergey Arakelyan	Digital Banking Director, Member of the Management Board
Are there any Politically Exposed Persons⁴ among your Institution's ownership structure and executive management?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Section II – Scope of Business Activities

Please list the principal areas of business in which your institution participates in terms of contribution to revenue.

No.	Principle line of Business Activity	Percentage (%)
1	Retail Banking ⁵	46%
2	Commercial Banking ⁶	23%
3	Private Banking	0%
4	Trust/Asset Management	0%
5	Corporate banking ⁷	31%

⁴ Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public functions. (Cf. FATF 40 Recommendations).

⁵ Retail banking includes
 -loans to individuals
 -commissions, etc

⁶ Commercial banking includes
 -Bond trading,
 -loans to banks,
 -repo,
 -reverse repo, etc.

⁷ Corporate banking includes loans to legal entities, Financial Institutions and Private Entrepreneurs

Total Operating Revenue in the latest Fiscal year	US\$	Million	Total Employees Persons
		USD	9.914
Indicate the kind of products and services offered by the Financial Institution			<input checked="" type="checkbox"/> Bulk cash activities
			<input type="checkbox"/> Cash letters / cheque clearings
			<input checked="" type="checkbox"/> Cash management, incl. Deposit accounts
			<input checked="" type="checkbox"/> International funds transfers
			<input checked="" type="checkbox"/> Bonds
			<input checked="" type="checkbox"/> Credit Cards
			<input checked="" type="checkbox"/> Loans
			<input type="checkbox"/> Money Markets
			<input type="checkbox"/> Syndicated loans
			<input checked="" type="checkbox"/> Foreign Exchanges
			<input type="checkbox"/> Insurance
			<input type="checkbox"/> Investment advisers / investment banking
			<input type="checkbox"/> Islamic Banking
			<input type="checkbox"/> Overnight investment accounts (sweep accounts)
			<input checked="" type="checkbox"/> Spots / Swaps / Options
			<input checked="" type="checkbox"/> Documentary collection
			<input checked="" type="checkbox"/> Guarantees
		<input checked="" type="checkbox"/> Letters of credit	
		<input checked="" type="checkbox"/> Standby L/C	
		<input checked="" type="checkbox"/> Mobile Banking	
		<input checked="" type="checkbox"/> Online Banking	
		<input type="checkbox"/> Private Banking	
		<input type="checkbox"/> other	

Section III – Client Database

Indicate the countries that Financial Institution conducts business with?	<input type="checkbox"/> Democratic People's Republic of Korea (DPRK)	<input type="checkbox"/> Sri Lanka	
	<input type="checkbox"/> Afghanistan	<input type="checkbox"/> Syria	
	<input type="checkbox"/> Ethiopia	<input type="checkbox"/> Trinidad and Tobago	
	<input type="checkbox"/> Iran	<input type="checkbox"/> Tunisia	
	<input type="checkbox"/> Iraq	<input checked="" type="checkbox"/> Turkey	
	<input type="checkbox"/> Jordan	<input type="checkbox"/> Uganda	
	<input checked="" type="checkbox"/> Lebanon	<input type="checkbox"/> Vanuatu	
	<input type="checkbox"/> Pakistan	<input type="checkbox"/> Yemen	
	<input type="checkbox"/> Serbia		
Is an account opening without personal contact possible? If yes, how does the Financial Institution verifies the identity of the customer?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Account opening without personal contact is possible only for individuals with RA nationality. Financial Institution verifies the identity of the customer in a biometric way, using database of EKENG CJSC (coordinator of e-government projects in the Republic of Armenia).			
Which of the following are available in the Financial Institution's customer base? Please indicate those that exceed 10% of total customer base.			
Type	Applicable	Value	Percentage (%)
1. Individuals (Mass Retail)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	201584	97.03
2. Individuals (Private Banking)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
3. Corporates	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Financial Institutions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
6. Non-Bank Financial Institutions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Governmental organizations / Supranational	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
8. Charities, Non-profit organizations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
9. Money services businesses (e.g. Remittance dealers, bureau de change, money transfer agents)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Which of the following are available in the Financial Institution's customer base? Please indicate.		
Type	Applicable	Value
1. Money Service Business Provider / Remittances	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1
2. Internet/online gambling companies	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

3.Precious metals and stones	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
4.Arms	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.Atomic power	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
6.Bitcoin or equivalent services / virtual currencies	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
7.Casinos, betting, other agents	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8.Politically Exposed Persons (PEPs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
9.Companies registered in Off-shore zone	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28
Please indicate the main industry sectors of corporate customer base that exceed 10%.		
Type	Applicable	
1. administration and support	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
2. banking, insurance and finance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3. real estate services and operations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
4. economics and corporate finance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. energy industry	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
6. pharmacy services	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
7. food and chemicals	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8. IT	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
9. casino business	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10.culture, the arts and creative work	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11.quality control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12.logistics and transportation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
13.marketing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14.media, advertising and PR	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
15. procurement	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
16.human resources management	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
17.sales and commerce	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
18.motor vehicle repair and maintenance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
19. churches and religious societies / associations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
20.virtual currency trading (e.g. Bitcoin)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
21.commerce involving a high proportion of cash funds (e.g. currency exchange)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
22.legal services	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

23.fuel trading	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
24.crafts and other skilled manual labor	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
25.services	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
26.government and public administration	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
27.construction	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
28.mechanical engineering	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
29.technology, electrical engineering and development	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
30.telecommunications	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
31.mining, quarrying and other minerals extraction	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
32.accommodation, food services and hospitality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
33.science and research	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
34.water industry	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
35.education, training and schools	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
36.arms industry	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
37.health care and social care	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
38.manufacturing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
39.agriculture, forestry and fishing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
40.trade in high-value commodities (precious metals, jewels, etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
41.charitable foundations, trust funds and similar legal arrangements, specify the purpose for which established in point	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
42.other – please specify in point	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the Financial Institution a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please describe the structure of your customer classification by risk level (% of high, medium, low risk clients)	
• High Risk	0.88 %
• Medium Risk:	98.85 %
• Low Risk:	0.27 %

Section IV – Anti-Money Laundering Questionnaire

<p>1. Is your institution subject to supervision by the banking authority which in the country where your institution has banking license? Authority Name: Central Bank Country: Republic of Armenia</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Does your Institution have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program which has been approved by senior management?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>3. Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Has your Institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>5. Does your Institution have a policy prohibiting accounts/relationships with shell banks (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.)?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>If no, please indicate the name of the bank</p>	
<p>6. Does your Institution have policies covering relationships with politically exposed persons consistent with industry best practices?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>7. Does your institution have prohibition policies to co-operate with entities that provide banking services to unlicensed banks</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>8. Does your Institution require that its AML policies and practices applied to all branches and subsidiaries in the home country and in locations outside of the home country?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>9. Has your Institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age / date of birth, number and type of valid official identification, as well as the name of the country / state that issued it)?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>10. Does your Institution have a risk focused assessment of its customer base and transactions of its customers?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>11. Does your Institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your Institution has reason to believe pose a heightened risk of illicit activities at or through your institution?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>12. Does your Institution have procedures to identify transactions structured to avoid large cash reporting requirements?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

13. Does your Institution screen customers or transactions that your institution deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) required special attention prior to completing any such transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14. Does your Institution have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15. Does your Institution provide AML training to relevant employees that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your institution's products and services and internal policies to prevent money laundering?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16. Does your Institution retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
17. Does your Institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
18. Does your Institution employ agents to carry out some of the functions of your institution and if so does your institution provides AML training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your institution's products and services and internal policies to prevent money laundering?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
19. Does your Institution provide Payable-through accounts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
20. Does your Institution provide Nested accounts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
21. Do you have a designated AML officer? If yes, please provide the following: Name: Tatyana Margaryan Title: Head of Financial monitoring Division E-mail: Tatyana.margaryan@idbank.am Tel.:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
※ If you checked "No" from questionnaire no. 1 to 17, please provide comments on any No <input checked="" type="checkbox"/> responses :	
※ If you checked "Yes" from questionnaire no. 18 to 20, please provide comments on any Yes <input checked="" type="checkbox"/> responses	

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered an accurate representation of the existing state of the institution's AML and KYC internal controls and financial service activities, and further that below clauses shall be kept firmly.

- A. *The institution responded this certification ensures that any of correspondent accounts or products is not conducted with or on behalf of shell banks.*
- B. *In any case the institution responded this certification deals a Nested Account; it ensures that an investigation for the AML activities of sub-account holder should be conducted.*
- C. *In any case the institution responded this certification deals a Payable-through Account; it ensures that reasonably appropriate customer due diligence should be conducted.*
- D. *The institution responded this certification ensures that it will provide the identification information of customer whom conducted a transaction through Correspondent Account with respondent bank's requirement.*

Completed by:**Name:** Tatyana Margaryan**Position:** Head of Financial Monitoring Department**Telephone No.:****E-mail :** Tatyana.margaryan@idbank.am**Date:** 30.11.2019**Signature:**