

Anti-Money Laundering Questionnaire

I. *General AML Policies, Practices and Procedures:*

1. Does the AML compliance program require approval of the FI's Board or a senior committee thereof?	Y <input checked="" type="checkbox"/>	No
2. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML framework ?	Y <input checked="" type="checkbox"/>	No
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y <input checked="" type="checkbox"/>	No
4. 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?	Y <input checked="" type="checkbox"/>	No
5. Does the FI 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.)?	Y <input checked="" type="checkbox"/>	No
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y <input checked="" type="checkbox"/>	No
7. Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	Y <input checked="" type="checkbox"/>	No
8. Does the FI have appropriate record retention procedures pursuant to applicable law?	Y <input checked="" type="checkbox"/>	No
9. 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?	Y <input checked="" type="checkbox"/>	No

II. *Risk Assessment*

10. Does the FI have a risk-based assessment of its customer base and transactions of its customers?	Y <input checked="" type="checkbox"/>	No
11. 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?	Y <input checked="" type="checkbox"/>	No

III. *Know Your Customer, Due Diligence and Enhanced Due Diligence*

12. Has the FI implemented systems for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y <input checked="" type="checkbox"/>	No
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	No
14. Does the FI collect information and assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	No
15. Does the FI have a process to review and, where appropriate, update customer information relating to high-risk client information?	Y <input checked="" type="checkbox"/>	No
16. Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information?	Y <input checked="" type="checkbox"/>	No
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	No



IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds		
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y <input checked="" type="checkbox"/>	No
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y <input checked="" type="checkbox"/> #See note below	No
21. Does the FI screen transactions and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y <input checked="" type="checkbox"/>	No
22. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Y <input checked="" type="checkbox"/>	No
V. Transaction Monitoring		
23. Does the FI have a monitoring program for unusual and potential suspicious activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	Y <input checked="" type="checkbox"/>	No
VI. AML Training		
24. Does the FI provide AML training to relevant employees that includes <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities, ▪ Examples of different forms of money laundering involving the FI's products and services and, ▪ Internal policies to prevent money laundering. 	Y <input checked="" type="checkbox"/>	No
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	No
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	No
27. Does the FI employ agents to carry out some of the functions of the FI and if so does the FI provide 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 the FI's products and services and internal policies to prevent money laundering?	Y <input checked="" type="checkbox"/> *See note below	No
# Answer to Question 19		
Yes, we have the duty to report a cash transaction involving the cash from two million bahts or more to the Anti-Money Laundering Office. We have a report to identify transactions structured involving cash in an amount less than two million bath (1.8+ - 1.9+) conducted more than once in the same day.		
* Answer to Question 27		
Yes, we have outsourced agents to perform certain function to the bank. But they don't have none of the authority to make decision whether or not to enter into any transactions with our customers. These decisions are made by our banking officer, while the process and control mechanism conducted by our own officer.		



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Title: Executive Vice President of Compliance
Signature: 
Date: 28 January 2010

Note: For any further information e.g. Corporate Profile, please refer to bank's web link: <http://www.uob.co.th/investor/investor.htm>.

