

**Financial Institution Name:** IDFC Bank Limited

**Location:** Naman Chambers, C-32, G Block, Bandra Kurla Complex, Mumbai- 400 051

*This questionnaire acts as an aid to firms conducting due diligence and should not be relied on exclusively or excessively. Firms may use this questionnaire alongside their own policies and procedures in order to provide a basis for conducting client due diligence in a manner consistent with the risk profile presented by the client. The responsibility for ensuring adequate due diligence, which may include independent verification or follow up of the answers and documents provided, remains the responsibility of the firm using this questionnaire.*

## Anti-Money Laundering Questionnaire

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire.

<b>I. General AML Policies, Practices and Procedures:</b>	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? <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.)</i>	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
8. Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
9. Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

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<b>II. Risk Assessment:</b>	<b>Yes</b>	<b>No</b>
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence:</b>	<b>Yes</b>	<b>No</b>
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
14. Does the FI assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:</b>	<b>Yes</b>	<b>No</b>
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"/>	N <input type="checkbox"/>
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"/>	N <input type="checkbox"/>
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
21. 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"/>	N <input type="checkbox"/>
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats? <sup>1</sup>	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
<b>V. Transaction Monitoring:</b>	<b>Yes</b>	<b>No</b>
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

<sup>1</sup> The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: [http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg\\_NYCH\\_Statement\\_on\\_Payment\\_Message\\_Standards\\_\(2007\).pdf](http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg_NYCH_Statement_on_Payment_Message_Standards_(2007).pdf)

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VI. AML Training	Yes	No
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
27. Does the FI employ third parties to carry out some of the functions of the FI?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Space for additional information:

(Please indicate which question the information is referring to.)

To be read in conjunction with AML Declaration annexed to this Questionnaire .....

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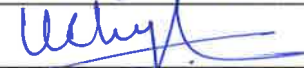
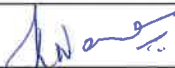
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<b>Name:</b> KAMALAKAR NAYAK	RAJESH TANHA
<b>Title:</b> HEAD-CORPORATE AND REGULATORY COMPLIANCE	HEAD COMPLIANCE TREASURY
<b>Signature:</b> 	
<b>Date:</b> AUGUST 10, 2015	

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## AML Declaration

IDFC, a Non-Banking Financial Services Company regulated by Reserve Bank of India (RBI), is a diversified financial services firm with a special focus on infrastructure financing. As a financial institution, IDFC is in compliance with applicable RBI guidelines and the statutory provisions relating to Anti Money Laundering.

On July 23, 2015 IDFC received the final banking license from Reserve Bank of India (RBI) to establish a new bank in the private sector under Section 22 of the Banking Regulation Act, 1949.

As per the terms and conditions of the final banking license, the regulatory framework governing the operations of the Bank include, inter alia, the Banking Regulation Act, 1949, other relevant statutes, and prudential regulations/directives/other guidelines of RBI. Accordingly, the operations of the new Bank will be governed by the provisions contained under the Prevention of Money Laundering Act 2002 and the rules notified by the Government of India, Master Circular of RBI on the Know Your Customer (KYC) norms / Anti-Money Laundering (AML) standards/Combating of Financing of Terrorism (CFT)/Obligation of banks under PMLA, 2002 and other related regulations/ guidelines issued by RBI from time to time.


India is a member of the Financial Action Task Force (FATF) since 2010 and accordingly RBI has been issuing guidelines in the KYC, customer due diligence and AML standards keeping in view the recommendations of FATF. These guidelines, along with the obligations on the banks pursuant to the Prevention of Money Laundering Act, 2002 and rules notified thereunder, require the Bank to submit prescribed regulatory reports to Financial Intelligence Unit – India (FIU-IND).

Further, the RBI guidelines also require the banks incorporated in India to have detailed AML policies and procedures covering, criteria for customer acceptance, customer risk categorisation and profiling, customer identification and verification, transaction monitoring, periodical review of customer accounts and reporting to regulatory agencies. The Bank has accordingly put in place the internal AML policy framework meeting the extant RBI regulatory requirements. The operational procedures for implementing the policy are currently being finalised along with the operating manuals of technology systems that are used for processing of customer transactions.

The above submission is being made to enable the setting up of the correspondent banking relationships of IDFC Bank with foreign banks. We further confirm that the operational activities through these correspondent banks will be governed by the internally approved final AML policies and operational procedures, which shall be in place before the commencement of operations by IDFC Bank.

Thanking you,

Yours sincerely,



(Kamalakar Nayak)  
Head - Corporate & Regulatory Compliance



(Rajesh Tanna)  
Head Compliance - Treasury