



Financial Institution Name:	London Forfaiting Company Limited
Location (Country) :	United Kingdom

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	London Forfaiting Company Limited
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	Malta; France; Germany; Brazil; USA
3	Full Legal (Registered) Address	15-18 Austin Friars, London, England, EC2N 2HE
4	Full Primary Business Address (if different from above)	15-18 Austin Friars, London, England, EC2N 2HE
5	Date of Entity incorporation / establishment	19th March 1984
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No <input type="button" value="v"/>
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	No <input type="button" value="v"/>
6 c	Government or State Owned by 25% or more	No <input type="button" value="v"/>
6 d	Privately Owned	Yes <input type="button" value="v"/>
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	100% of London Forfaiting Company Limited's shares are held by FIMBank p.l.c. FIMBank is owned by United Gulf Holding company B.S.C 78.60% and Borgan Bank S.A.K 8.50%
7	% of the Entity's total shares composed of bearer shares	No Bearer Shares
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No <input type="button" value="v"/>
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	Yes
9 b	Cash Reporting	Yes
9 c	CDD	Yes
9 d	EDD	Yes
9 e	Beneficial Ownership	Yes
9 f	Independent Testing	Yes
9 g	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i	Risk Assessment	Yes
9 j	Sanctions	Yes
9 k	PEP Screening	Yes
9 l	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	Yes
9 n	Training and Education	Yes
9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
11a	If Y, provide further details	

3. ANTI BRIBERY & CORRUPTION			
12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes	<input type="checkbox"/>
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	<input type="checkbox"/>
14	Does the Entity provide mandatory ABC training to:		
14 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
14 b	1st Line of Defence	Yes	<input type="checkbox"/>
14 c	2nd Line of Defence	Yes	<input type="checkbox"/>
14 d	3rd Line of Defence	Yes	<input type="checkbox"/>
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	No	<input type="checkbox"/>
14 f	Non-employed workers as appropriate (contractors / consultants)	No	<input type="checkbox"/>

4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 c	Sanctions violations	Yes
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
16 d	Prohibit accounts / relationships with shell banks	Yes
16 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 g	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
16 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
16 i	Define escalation processes for financial crime risk issues	Yes
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a	If Y, what is the retention period?	5 years or more

5. KYC, CDD and EDD			
19	Does the Entity verify the identity of the customer?	Yes	<input type="checkbox"/>
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes	<input type="checkbox"/>
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:		
21 a	Ownership structure	Yes	<input type="checkbox"/>
21 b	Customer identification	Yes	<input type="checkbox"/>
21 c	Expected activity	Yes	<input type="checkbox"/>
21 d	Nature of business / employment	Yes	<input type="checkbox"/>
21 e	Product usage	Yes	<input type="checkbox"/>
21 f	Purpose and nature of relationship	Yes	<input type="checkbox"/>
21 g	Source of funds	Yes	<input type="checkbox"/>
21 h	Source of wealth	Yes	<input type="checkbox"/>
22	Are each of the following identified:		
22 a	Ultimate beneficial ownership	Yes	<input type="checkbox"/>
22 a1	Are ultimate beneficial owners verified?	Yes	<input type="checkbox"/>
22 b	Authorised signatories (where applicable)	Yes	<input type="checkbox"/>
22 c	Key controllers	Yes	<input type="checkbox"/>
22 d	Other relevant parties	Where applicable. on Customers's customer, related parties to transaction	
23	Does the due diligence process result in customers receiving a risk classification?	Yes	<input type="checkbox"/>
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	<input type="checkbox"/>
25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes	<input type="checkbox"/>
26	Does the Entity have a process to review and update customer information based on:		
26 a	KYC renewal	Yes	<input type="checkbox"/>
26 b	Trigger event	Yes	<input type="checkbox"/>

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27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?		
27 a	Non-account customers	Do not have this category of customer or industry	<input type="checkbox"/>
27 b	Non-resident customers	EDD on a risk based approach	<input type="checkbox"/>
27 c	Shell banks	Prohibited	<input type="checkbox"/>
27 d	MVTS/ MSB customers	Do not have this category of customer or industry	<input type="checkbox"/>
27 e	PEPs	EDD on a risk based approach	<input type="checkbox"/>
27 f	PEP Related	EDD on a risk based approach	<input type="checkbox"/>
27 g	PEP Close Associate	EDD on a risk based approach	<input type="checkbox"/>
27 h	Correspondent Banks	Do not have this category of customer or industry	<input type="checkbox"/>
27 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?		
27 i	Arms, defense, military	EDD & restricted on a risk based approach	<input type="checkbox"/>
27 j	Atomic power	Prohibited	<input type="checkbox"/>
27 k	Extractive industries	EDD on a risk based approach	<input type="checkbox"/>
27 l	Precious metals and stones	Do not have this category of customer or industry	<input type="checkbox"/>
27 m	Unregulated charities	Do not have this category of customer or industry	<input type="checkbox"/>
27 n	Regulated charities	Do not have this category of customer or industry	<input type="checkbox"/>
27 o	Red light business / Adult entertainment	Do not have this category of customer or industry	<input type="checkbox"/>
27 p	Non-Government Organisations	Do not have this category of customer or industry	<input type="checkbox"/>
27 q	Virtual currencies	Do not have this category of customer or industry	<input type="checkbox"/>
27 r	Marijuana	Do not have this category of customer or industry	<input type="checkbox"/>
27 s	Embassies / Consulates	Do not have this category of customer or industry	<input type="checkbox"/>
27 t	Gambling	Do not have this category of customer or industry	<input type="checkbox"/>
27 u	Payment Service Provider	Do not have this category of customer or industry	<input type="checkbox"/>
27 v	Other (specify)		
28	If restricted, provide details of the restriction		

6. MONITORING & REPORTING			
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes	▼
30	What is the method used by the Entity to monitor transactions for suspicious activities?	Manual	▼
31	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	▼
31 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	▼
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	▼

7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes <input type="button" value="v"/>
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes <input type="button" value="v"/>
34 b	Local Regulations	Yes <input type="button" value="v"/>
34 b1	Specify the regulation	The Money Laundering, Terrorist Financing and Transfer of Funds (information on the payer) Regulations 2017
34 c	If N, explain	

8. SANCTIONS			
35	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	Yes	<input type="checkbox"/>
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	<input type="checkbox"/>
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		
37 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
37 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
37 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
37 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	<input type="checkbox"/>
37 f	Other (specify)		
38	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No	<input type="checkbox"/>

9. TRAINING & EDUCATION			
39	Does the Entity provide mandatory training, which includes :		
39 a	Identification and reporting of transactions to government authorities	Yes	<input type="checkbox"/>
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	<input type="checkbox"/>
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	<input type="checkbox"/>
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	Yes	<input type="checkbox"/>
40	Is the above mandatory training provided to :		
40 a	Board and Senior Committee Management	Yes	<input type="checkbox"/>
40 b	1st Line of Defence	Yes	<input type="checkbox"/>
40 c	2nd Line of Defence	Yes	<input type="checkbox"/>
40 d	3rd Line of Defence	Yes	
40 e	3rd parties to which specific FCC activities have been outsourced	No	
40 f	Non-employed workers (contractors / consultants)	No	

10. AUDIT

41	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	Yes	
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London Forfaiting Company Limited (Financial Institution name)

I, Paul Bohannon (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

Paul Bohannon 17th May 2022 (Signature & Date)