

**UNION BANK OF INDIA**

**FINANCIAL INSTITUTIONS (FI) QUESTIONNAIRE**  
**ON KNOW YOUR CUSTOMER / ANTI MONEY LAUNDERING/ COUNTERING THE**  
**FINANCING OF TERRORISM**

<b>Section I – General Administrative Information</b>	
1. Name of FI	Union Bank of India
2. Legal Form of FI	Public Sector Bank
3. SWIFT Address / Website of FI	UBININBB / <a href="http://www.unionbankofindia.co.in">http://www.unionbankofindia.co.in</a>
4. Principal Place of Business of FI (Address)	Head Office, Union Bank Bhawan 239, Vidhan Bhawan Marg, Nariman Point, Mumbai - 400021
5. Registered at / Banking License issuing authority/Date and number of FI	N.A. – Acquired by Government of India by a separate notification.
6.	<p>Does your Institution maintain a physical presence* in the licensing country? – YES</p> <p>Is your institution an agency, branch or subsidiary of a bank with a physical presence? <b>NO</b></p> <p>- If yes, please answer the following questions :</p> <ul style="list-style-type: none"><li>Name of affiliate / parent company:</li><li>Is affiliate / parent company publicly traded? YES <input type="checkbox"/> NO <input type="checkbox"/></li></ul> <p><b>If yes, list exchanges and symbols:</b></p> <ul style="list-style-type: none"><li>Indicate affiliation: Agency <input type="checkbox"/> Branch <input type="checkbox"/> Subsidiary <input type="checkbox"/></li><li>Licensing country of affiliate:</li></ul> <p><b>* 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.</b></p>



	Is your institution a publicly traded entity? YES																								
7.	<p>If yes, please list the exchanges &amp; symbols:</p> <p><b>Bombay Stock Exchange – Scrip code – 532477</b></p> <p><b>National Stock Exchange – Scrip Code – UNIONBANK - EQ</b></p>																								
<b>Section II – Scope of Business Activities</b>																									
8.	Please list the principal countries in which your institution maintains branches, agencies and subsidiaries.																								
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<b>Section III– Ownership and Management Information</b>																									
9.	Please list the names of the owners of your institution and their ownership interest. (For purposes of this questionnaire, an “owner” is any person or juridical entity that, directly or indirectly, owns, controls or has voting power of twenty percent (20%) or more of any class of securities of your institution.)																								
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10	Please list the names of the principal officers and directors of your institution, their respective positions, and the number of years they have been employed by the bank. (Please attach additional sheets if necessary).																								
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## ANTI MONEY LAUNDERING QUESTIONNAIRE

### IV. GENERAL AML POLICIES, PRACTICES AND PROCEDURES

		YES	NO
1	Does the FI have a legal and regulatory compliance program that requires approval of the FI's Board or a senior committee thereof?	YES	<input type="checkbox"/>
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 program on a day-to-day basis, which has been approved by senior management of the FI?	YES	<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 that has been approved by senior management?	YES	<input type="checkbox"/>
4	Does the FI have self- assessment procedures as part of its internal control environment to assure compliance with applicable laws and internal policies?	YES	<input type="checkbox"/>
5	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?	YES	<input type="checkbox"/>
6	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.)?	YES	<input type="checkbox"/>
7	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	YES	<input type="checkbox"/>
8	Does the FI have appropriate record retention procedures pursuant to applicable law?	YES	<input type="checkbox"/>
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?	YES	<input type="checkbox"/>
10	Does the FI have a system to categorize risk profile of the clients as per the laws prevailing from time to time?	YES	<input type="checkbox"/>
11	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?	YES	<input type="checkbox"/>

### V. RISK ASSESSMENT

12	Does the FI have a risk-focused assessment of its customer base?	YES	<input type="checkbox"/>
13	Does the FI identify the categories of customers whose transactions and banking activities are routine and usual?	YES	<input type="checkbox"/>
14	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	YES	<input type="checkbox"/>



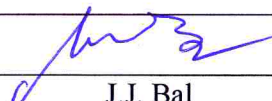
<b>VI KNOW YOUR CUSTOMER, DUE DILEGENCE &amp; ENHANCED DUE DILIGENCE</b>			
		<b>YES</b>	<b>NO</b>
15	Is there a person designated by FI as responsible for AML arrangements? If yes, please provide the following Name : A.K. Bhanja Address : Union Bank of India, 10 <sup>th</sup> Floor,, Central Office, 239, Nariman Point, Mumbai Telephone: +91 22 22896428 e-mail ID : akbhanja@unionbankofindia.com	YES	<input type="checkbox"/>
16	Has the FI 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)?	YES	<input type="checkbox"/>
17	Does the FI have a requirement to collect information regarding its customers' business activities?	YES	<input type="checkbox"/>
18	Does the FI collect information and assess its FI customers' AML policies or practices?	YES	<input type="checkbox"/>
19	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at the time of account opening?	YES	<input type="checkbox"/>
20	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	YES	<input type="checkbox"/>
21	For legal entities, does the FI obtain copies of the constitutive documents of their customers?	YES	<input type="checkbox"/>
<b>VII REPORTABLE TRANSACTIONS AND PREVENTION AND DETECTION OF TRANSACTIONS WITH ILLEGALLY OBTAINED FUNDS</b>			
22	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES	<input type="checkbox"/>
23	Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	YES	<input type="checkbox"/>
24	Does the FI have automated systems to screen all transactions (originators and beneficiaries) against lists issued by government/ international agencies of known or suspected terrorists and narcotics traffickers prior to conducting a transactions?	YES	<input type="checkbox"/>
25	Does the FI have a process to ensure that they do not conduct transactions with or on behalf of shell banks through any of its accounts or products?	YES	<input type="checkbox"/>
26	Does the FI have policies to ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	YES	<input type="checkbox"/>
27	Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FIs that do not comply with industry best practices? (Downstream products are defined as a Correspondent banking client who receives correspondent banking services from an institution and itself provides correspondent banking services to other financial institutions in the same currency as the account it maintains with the institution)	YES	<input type="checkbox"/>



<b>VIII. TRANSACTION MONITORING</b>			
		<b>YES</b>	<b>NO</b>
28	Does your organization have a monitoring programme for suspicious or unusual activity that covers funds transfer and monetary instruments (such as travelers checks, money orders etc.)	YES	<input type="checkbox"/>

<b>IX. AML TRAINING</b>			
29	Does the FI provide AML training to its employees 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, internal policies to prevent money laundering as well as the process to report suspicious transactions?	YES	<input type="checkbox"/>
30	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES	<input type="checkbox"/>
31	Does the FI have policies to communicate new laws or changes to existing policies or practices to its employees and agents?	YES	<input type="checkbox"/>
32	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?	<input type="checkbox"/>	No
33	Has the FI participated in / attended industry/ government AML seminars?	YES	<input type="checkbox"/>

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Signature :	
Completed by :	J.J. Bal
Position :	Assistant General Manager
Date :	20/01/2016
Name of Institution :	Union Bank of India
Address of Institution :	239, Union Bank Bhavan, Vidhan Bhavan Marg, Nariman Point, Mumbai – 400 021.
E-mail :	jjbal@unionbankofindia.com



