

**RCBC FOREX BROKERS CORPORATION
QUESTIONNAIRE FOR LOCAL MONEY SERVICE BUSINESS**

I. Customer Identification
1. Legal Name of Money Service Business (Company) ¹ :
2. Other name/s by which your Company is known (if any): (a) _____ (b) _____
3. Principal Place of Business (Address) ² :
4. Legal Form (i.e. Sole Proprietorship, Stock Corporation): <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input type="checkbox"/> Others (Please specify): _____
5. Tax Identification Number or its equivalent:
6. Number of Domestic / Foreign (if any) Branches, as of date of questionnaire: Domestic: Foreign:
7. Name of Licensing/ Regulatory Authority / Country of Jurisdiction: <input type="checkbox"/> Country of Jurisdiction: Philippines <input type="checkbox"/> Bangko Sentral ng Pilipinas (BSP) <input type="checkbox"/> Anti-Money Laundering Council (AMLC) <input type="checkbox"/> Securities and Exchange Commission (SEC) <input type="checkbox"/> Others (Please specify): _____ <input type="checkbox"/> Other Country of Jurisdiction (Please specify): _____ <input type="checkbox"/> Name of Licensing/Regulatory Authority (Please specify): _____
8. Type of License / Date issued:

¹ The legal name of the Company as stated in the Certificate of Registration with BSP, AMLC, SEC/Department of Trade and Industry (DTI)

² The place of business/address as stated in the Certificate of Registration with BSP, AMLC, SEC/DTI

<p><input type="checkbox"/> Bangko Sentral ng Pilipinas³ – Date issued: _____</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type A: Large Scale Operator – Remittance Agent</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type B: Small Scale Operator – Remittance Agent</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type C: E-Money Issuer</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type D: Remittance Platform Provider</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type E: Large Scale Operator – Money Changer/Foreign Exchange Dealer</p> <p style="margin-left: 20px;"><input type="checkbox"/> Type F: Small Scale Operation – Money Changer/Foreign Exchange Dealer</p> <p style="margin-left: 20px;"><input type="checkbox"/> Others (please specify): _____</p> <p><input type="checkbox"/> Others (Please specify): _____</p> <p style="margin-left: 20px;">Date issued: _____</p>
<p>9. Name of External Auditors⁴:</p>
<p>10. Authorized Personnel To Trade with RCBC Forex: (For Corporations, please attach Board Resolution.)</p> <p style="margin-left: 20px;">(a) _____</p> <p style="margin-left: 20px;">(b) _____</p> <p style="margin-left: 20px;">(c) _____</p> <p style="margin-left: 20px;">(d) _____</p>
<p>11. Authorized Email Addresses To Confirm Trades with RCBC Forex:</p>
<p>12. Account Numbers of RCBC accounts to be used for Settlement (Include Currency)⁵:</p>
<p>II. Ownership and Management Structure</p>
<p>13. (For Sole Proprietorships/Partnerships) Indicate the name of the owners/partners:</p>

³ BSP license enumerated are based on BSP Circular No. 942. If the BSP granted other license to the Company, please specify under Others.

⁴ Per BSP Circular No. 942, The audited financial statements for entities with total assets of at least P50,000,000 shall be opined upon by any of the BSP-selected external auditors

⁵ Per BSP Circular No. 950, foreign exchange dealers/money changers/remittance and transfer companies shall be required to use company accounts for their remitting, foreign exchange dealing and money changing business.

<p>14. (For Corporations) Is your Company a publicly listed entity?</p> <p><input type="checkbox"/> YES</p> <p style="margin-left: 20px;"><input type="checkbox"/> Stock Exchange: _____</p> <p style="margin-left: 20px;"><input type="checkbox"/> Symbol: _____</p> <p><input type="checkbox"/> NO</p>								
<p>15. (For Corporations) If your Company is privately owned⁶, list down the names of person(s) or entity(ies) owning 20% or more of the voting and their respective interests (%) in the Company.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; border-bottom: 1px solid black;">NAME</th> <th style="text-align: center; border-bottom: 1px solid black;">OWNERSHIP INTEREST (%)</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> </tr> </tbody> </table>	NAME	OWNERSHIP INTEREST (%)						
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<p>16. (For Corporations) If any of the owners is a legal entity, indicate below the names of the shareholders of the legal entity owning 20% or more of the voting shares and their respective shareholders' ownership and nature of ownership (Note: If any legal entity is publicly held, please indicate only that it is publicly held and the exchanges on which shares are traded.)</p> <p>Please use separate sheets, if necessary.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; border-bottom: 1px solid black;">Entity</th> <th style="text-align: center; border-bottom: 1px solid black;">Shareholders</th> <th style="text-align: center; border-bottom: 1px solid black;">Ownership Interest (%)</th> <th style="text-align: center; border-bottom: 1px solid black;">Nature of Ownership (Direct/Indirect)</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> </tr> </tbody> </table>	Entity	Shareholders	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)				
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<p>17. (For Corporations) Name and Address of Ultimate Parent Company:</p> 								
<p>18. (For Corporations) Name and Address of Parent Company:</p> 								
<p>19. (For Corporations) Jurisdiction of Licensing Authority and Regulator of Parent Company:</p> 								
<p>20. (For Corporations) Is your <u>parent company</u> a publicly listed entity?</p> <p><input type="checkbox"/> YES</p> <p style="margin-left: 20px;"><input type="checkbox"/> Stock Exchange: _____</p>								

⁶ The Company is not listed in a major stock exchanges

<input type="checkbox"/> Symbol: _____ <input type="checkbox"/> NO			
21. Please provide the names of your Senior Executives or Officers. <table><thead><tr><th><u>Name of Senior Executive or Officers</u></th><th><u>Position</u></th><th><u>Years of Service</u></th></tr></thead></table>	<u>Name of Senior Executive or Officers</u>	<u>Position</u>	<u>Years of Service</u>
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22. Are there any Politically Exposed Persons (PEP) ⁷ within your Company's ownership structure or executive management? If yes, please provide details, i.e., names and position in the organization. <input type="checkbox"/> YES <input type="checkbox"/> NO <table><thead><tr><th><u>NAME</u></th><th><u>POSITION</u></th></tr></thead></table>	<u>NAME</u>	<u>POSITION</u>	
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⁷ PEP are individuals who are or have been entrusted with prominent public functions, for example: Heads of State or government, senior politicians, senior government officials, judicial or military officials, senior executives of state-owned corporations, important political party officials, or their family members or close associates. The definition is not intended to cover middle ranking or more junior individuals in the foregoing categories.

III. Business Activity

23. List down the profile of your major clients:

- Corporate
 - Money changers/forex dealers/remittance agents
 - Financial services (e.g., banks, insurance, lending institutions)
 - Government institutions
 - Internet/online gaming
 - Casino
 - Business process outsourcing
 - Import/export company
 - Pawnshops
 - Jewels, gems and precious stones dealers
 - Non-governmental organizations and Not-for-profit organizations
 - Others: _____

- Individuals
 - Overseas Filipino workers
 - Politically Exposed persons (PEP)
 - Foreign individuals
 - One-time clients
 - Others: _____

24. What are the currencies you are to transact with RCBC Forex and the expected daily volume for each currency?

Currency	Expected Maximum Daily Volume
USD	
EUR	
GBP	
JPY	
HKD	
CAD	
SGD	
CHF	
AUD	
CNY	

25. Is your Company a shell company⁸:

- YES
- NO

Does your Company conduct business with shell companies?

- YES
- NO

⁸ A Shell Company is a legal entity which has no business substance in their own right but through which financial transactions may be conducted.

26. Has your Company ever been subjected to administrative and/or monetary penalty/ies for violation of Anti-Money Laundering rules and regulations?

YES (Please provide details):

NO

IV. Wolfsberg Questionnaire	Yes	No
<i>A. General AML Policies, Practices and Procedures</i>		
1. Is the AML compliance program approved by the Company's Board of Directors/Partners/Sole Proprietor or Senior Committee?		
2. Does the Company have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?		
3. Has the Company developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?		
4. In addition to inspections by the government regulators, does the Company have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?		
5. Does the Company have a <u>policy</u> prohibiting accounts/relationships with shell banks?		
6. Does the Company have <u>policies</u> to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?		
7. Does the Company have <u>policies</u> covering relationships with Politically Exposed Persons (PEP's), their family and close associates?		
8. Does the Company have record retention procedures that comply with applicable law?		
9. Are the Company's AML policies and practices being applied to all branches and subsidiaries of the Company both in the home country and in locations outside of that jurisdiction?		
<i>B. Risk Assessment</i>		
10. Does the Company have a risk-based assessment of its customer base and their transactions?		
11. Does the Company determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Company has reason to believe pose a heightened risk of illicit activities at or through the Company?		
<i>C. Know Your Customer, Due Diligence and Enhanced Due Diligence</i>		
12. Has the Company implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?		
13. Does the Company have a requirement to collect information regarding its customers' business activities?		

14. Does the Company assess its financial institution customers' AML policies or practices?		
15. Does the Company have a process to review and, where appropriate, update customer information relating to high risk client information?		
16. Does the Company have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?		
17. Does the Company complete a risk-based assessment to understand the normal and expected transactions of its customers?		
<i>D. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</i>		
18. Does the Company have policies or practices for the identification and reporting of transactions that are required to be reported to the BSP and the AMLC?		
19. Where cash transaction reporting is mandatory, does the Company have procedures to identify transactions structured to avoid such obligations?		
20. Does the Company screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?		
21. Does the Company have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?		
22. If the Company uses the SWIFT messaging system, does the Company adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?1		
<i>E. Transaction Monitoring</i>		
23. Does the Company have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers' checks, money orders, etc.?		
<i>F. AML Training</i>		
24. Does the Company 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. • Internal policies to prevent money laundering. 		
25. Does the Company retain records of its training sessions including		

attendance records and relevant training materials used?		
26. Does the Company communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?		
27. Does the Company employ third parties to carry out some of the functions of the Company?		
28. If the answer to question 27 is yes, does the Company provide AML training to relevant third parties 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. • Internal policies to prevent money laundering. 		

Additional Information (Please indicate which question the information is referring to):

Please provide contact details of your **Compliance Officer** or the person in charge of the AML/KYC program.

Name : _____

Title : _____

Telephone No. : _____

E-mail address : _____

Signature : _____

Date : _____