

QUESTIONNAIRE ANTI MONEY LAUNDERING (AML)

Name Financial Institution:	Banco Terra, S.A.
Address:	Av. Samora Machel 323
Country	Mozambique

Please indicate either “Yes” or “No” response for each question:		Yes	No
1	Has your institution developed written policies documenting the processes you have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	yes	
2	In addition to inspections by the government supervisors/regulators, do you have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	yes	
3	Does your institution 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)?		No
4	Does your institution have appropriate record retention procedures pursuant to applicable law?	yes	
5	Does your institution have policies covering relationship with politically exposed persons consistent with industry best practices?	yes	
6	Does your institution have a risk focused assessment of its customer base and transactions of its customers?	yes	
7	Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that you have reason to believe pose a heightened risk of illicit activities at or through your institution?	yes	
8	Has your institution implemented systems for identification of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number)?	yes	
9	Does your institution have a requirement to collect information regarding its customers' business activities?	yes	
10	Does your institution collect information and assess your customer's AML policies or practices?	yes	
11	Does your institution take reasonable steps to obtain information relevant to assess and mitigate money laundering risks associated with your bank's correspondent accounts for other foreign bank (i.e. nested correspondent bank activity)?	Yes	
12	Does your institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	yes	
13	Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	yes	
14	Does your institution screen transactions for customers or transactions you deem to be significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies? That special attention to such customers or transactions is necessary prior to completing any such transaction?	Yes	
15	Does your institution have policies to reasonable ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products (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)?		No
16	Does your institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travels checks, money orders etc.)?	yes	
17	Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	yes	
18	Does your institution provide AML training to relevant employees that include	yes	

	identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving your products and services and internal policies to prevent money laundering?		
19	Do you employ agents to carry out some of the functions of your institutions?	yes	
20	If you answered "yes" to the previous question, do you 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 your products and services and internal policies to prevent money laundering?	yes	

Comments (elaborate on questions answered "No")

3. We do not deal with shell banks
 15.No specific policies does exist as we do not deal with "shell Banks"

Questionnaire AML completed by:

Name:	Aquiles Dimene
Position:	Chief Legal, HR and Compliance Officer
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Date:	17/10/2011
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