

AML/CFT CDD Questionnaire

The AML/CFT questionnaire provides an overview of Maybank and its subsidiaries Anti-Money Laundering and Counter Financing of Terrorism (AML/CFT) policies and practices compliant with relevant laws and Bank Negara Malaysia (Central Bank of Malaysia) guidelines, as well as its due diligence requirements associated with the provision of correspondent banking services in conducting international business.

INSTITUTIONAL INFORMATION

Name of Institution	Malayan Banking Berhad
Country of Incorporation	Malaysia
Registered Office	14TH FLOOR, MENARA MAYBANK 100, JALAN TUN PERAK 50050 KUALA LUMPUR MALAYSIA
Registration Number / Date of Incorporation	3813K / 31st May 1960
SWIFT Code	MBBEMYKL
Website Address	www.maybank2u.com.my
Regulator Authority's Name	CENTRAL BANK OF MALAYSIA (BNM) www.bnm.gov.my
Legal Status	Public Company, listed on the Bursa Malaysia Securities Berhad www.bursamalaysia.com
Ownership Structure	Please refer to our Annual Report at our website: www.maybank2u.com.my
Management Structure	Please refer to our Annual Report at our website: www.maybank2u.com.my
Principle Line of Business	Business of Banking & Finance

ANTI-MONEY LAUNDERING/COUNTER FINANCING OF TERRORISM

Laws and Regulations

Yes No

-
- | | | |
|---|---|---|
| 1 | Is money laundering and terrorist financing considered a crime in your country? | √ |
| 2 | Has your country established laws designed to prevent money laundering and terrorist financing? | √ |
| 3 | Is your institution subject to such laws/ regulations? | √ |
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Policies and Procedures

Yes No

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- | | | |
|---|---|---|
| 4 | Is your institution's AML/CFT policies and procedures according to local laws, rules and standards? | √ |
| 5 | Does your institution have written policies and procedures on AML/CFT for all domestic and foreign business units? | √ |
| 6 | Does your institution's AML/CFT policies and procedures apply to all your branches and subsidiaries both in the home country and in locations outside of your home country? | √ |
| 7 | Does your institution's AML/CFT policies and procedures require approval of your Board/Management/Senior Management? | √ |
| 8 | Is implementation of AML/CFT policies and procedures monitored on a permanent basis? | √ |
| 9 | Does your compliance program include establishing policies, procedures and processes for managing Economic & Trade Sanctions? | √ |
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If 'Yes', please indicate the Sanctions program(s) incorporated in your compliance program:

- | | |
|---|---|
| <input checked="" type="checkbox"/> OFAC | <input checked="" type="checkbox"/> United Nations |
| <input type="checkbox"/> DFAT (Australia) | <input type="checkbox"/> European Union |
| <input type="checkbox"/> HM Treasury | <input type="checkbox"/> NZRBA |
| <input type="checkbox"/> HKMA | <input type="checkbox"/> Others (<i>Please specify</i>) |
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KYC/CDD		Yes	No
10	Does your AML KYC/CDD policies and procedures require to:-		
	a) Identify and verify the identity of customers.	√	
	b) Identify and verify beneficial ownership and control of such transaction.	√	
	c) Obtain information on the purpose and intended nature of the business relationship/transaction.	√	
	d) Conduct on-going due diligence and scrutiny, to ensure the information provided is updated and relevant.	√	
	e) Monitor customers' activities to detect suspicious transactions.	√	
	f) Conduct enhanced due diligence for high risk customers such as PEPs, unregulated industries, etc.	√	
	g) Keep all the records pertinent to customers' identifications and transactions.	√	
	h) If 'Yes' to Question 10(g), for how long are records kept?		7 years
11	Does your AML KYC/CDD policies and procedures allow for:-		
	a) Opening or maintaining anonymous accounts.		√
	b) Conducting business with banks having no physical presence in any country i.e. Shell banks.		√
12	How frequent does your institution screen its existing customer database?		Quarterly
13	Has your institution been subject to any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorism financing in the past five years.		√
14	Does your institution follow FATF recommendations on money laundering and terrorist financing?	√	
15	Does your institution provide services to Offshore Banks, Internet Banking based institutions or banks located in high risk areas as highlighted by FATF?		√

KYC/CDD**Yes No**

16 Does your institution identify the transactions related to persons/entities suspected of ML/TF, comprised in official lists of appropriate authorities?

√

17 Does your institution ensure that effective anti-money laundering and counter-terrorism controls are in place on new technologies and when dealing in non-face to face interactions or through intermediaries?

√

18 Do you search your customer against a particular Sanctions program?

√

If 'Yes', please indicate the Sanctions program(s) used:

 OFAC DFAT (Australia) HM Treasury HKMA United Nations European Union NZRBA Others (*Please specify*)

19 If 'Yes' to Question 18, please state how frequent you conduct this search over your customer database?

Daily checking of OFAC/UNSC for new accounts and quarterly checking for all accounts (new and existing accounts).

20 Do you include originator information with outgoing wire transfer?

√

21 If 'Yes' to Question 20, are you required by your local regulator to do so?

√

22 Do you filter your international telegraphic transfers (e.g. international wire transfers) against a particular Sanctions program?

√

If 'Yes', please indicate the Sanctions program(s) used:

 OFAC DFAT (Australia) HM Treasury HKMA United Nations European Union NZRBA Others (*Please specify*)

AML/CFT Compliance Program		Yes	No
23	Does your institution have a senior officer or a designated Compliance Officer responsible for your institution's anti-money laundering program?	√	
24	Does your institution provide AML/CFT training to employees that include identification and reporting of transactions, different forms of money laundering involving the institution's products and services and internal policies to prevent money laundering?	√	
25	Does your institution retain records of its training sessions including attendance records and relevant training materials used?	√	
26	Does your institution communicate new AML/CFT related laws or changes to existing AML/CFT related policies or practices to employees?	√	
27	Does your institution employ third parties to carry out some of the functions of the institution?	√	
28	If 'Yes' to Question 27, does your institution provide AML/CFT training to relevant third parties that includes identification and reporting of transactions, different forms of money laundering involving the institution's products and services and internal controls to prevent money laundering?	√	
29	Does your institution have a policy of protecting the employees, if they, in good faith, report a suspicious transaction?	√	
30	Has your institution developed an Internal Audit function in order to test the system for prevention of money laundering and terrorism financing and reviews your institution's AML/CFT Compliance policy and program?	√	
31	If 'Yes' to Question 30, how frequent is the review conducted?	Annually	
32	Are the results of the review escalated to Senior Management?	√	
33	Are steps taken to close the compliance gaps identified by such reviews?	√	

CONTACT DETAILS

1 Has your institution appointed a Compliance Officer for AML/CFT? ✓ **Yes**

2 If so, please give the name and title of Compliance Officer in your institution, his/her email, address, phone number, fax number for future references.

Name **Nik Nuun Asma Nik Sulaiman**
Title **Head, AML/CFT & Compliance Strategy**
E-mail niknuun@maybank.com.my
Address **Group Compliance
10th Floor, East Wing,
Menara Maybank,
100, Jalan Tun Perak,
50050 Kuala Lumpur
MALAYSIA**
Phone No. **(6) 03 - 20748237**
Fax No. **(6) 03 - 27159403**
Signature



Date **25th May 2012**

AML/CFT Policy

Anti-Money Laundering/Counter Financing of Terrorism Policy

Maybank Group is at the forefront of the Government and Bank Negara Malaysia's continuous initiatives and efforts in the prevention of the use of the banking system for illicit, laundering and terrorism financing activities.

The Group demonstrates its full commitment and support to high standards of compliance with the Anti-Money Laundering/Counter Financing of Terrorism (AML/CFT) requirements by establishing robust and comprehensive policy, procedures, processes and systems for the prevention and detection of money laundering and terrorist financing activities.

The enterprise-wide AML/CFT programme is subject to periodic reviews to ensure that it remains robust and complies with the requirements of the Anti-Money Laundering and Anti-Terrorism Financing Act 2001 (AMLATFA 2001), the Financial Action Task Force (FATF) Recommendations as well as international best practices.

Key measures undertaken in Maybank Group include having in place the following:

- Policy and procedures which outline the roles and responsibilities as well as establish clear accountability of all employees within the Group;
- Customer Due Diligence measures which emphasise the importance of ascertaining customer's identity and establishing the ultimate economic beneficiary via documentary and/or non documentary mechanisms;
- Ongoing monitoring of customer transactions through management information systems that enables the detection and reporting of suspicious activities to the Financial Intelligence Unit, Bank Negara Malaysia on timely basis;
- Provision of full and timely disclosure of suspicious transactions/circumstances to the relevant authorities as provided under all applicable laws/respective jurisdictions;
- Record keeping of all identification/transaction details obtained for the purpose of customer identification as well as of all documents in accordance with statutory requirements; and
- Regular AML/CFT communication and training programs through various channels to raise staff awareness at all levels within the Group.
- The extensive infrastructure and resources invested reaffirms the Group's full commitment and strong support to international efforts in combating money laundering, the financing of terrorism and other criminal activities.

Entities within the Group, regardless of geographic locations, are strongly committed in ensuring compliance with the Group-wide AML/CFT Policy as well as applicable AML/CFT legislations within the jurisdiction they operate in adopting the most rigorous standards.

The Group fully co-operates with the enforcement agencies and competent authority in the investigation of money laundering and/or financial crime.

Global USA Patriot Act Certification

Annex I

ADDRESS	COUNTRY	LOCAL BANKING AUTHORITY
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Head Office

Menara Maybank 100, Jalan Tun Perak 50500 Kuala Lumpur Malaysia	Malaysia	Bank Negara Malaysia
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Overseas Branches

Maybank London <i>74, Coleman Street London EC2R 5BN England</i>	United Kingdom	Financial Services Authority
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Maybank Hong Kong <i>21st Floor, Man Yee Building 68 Des Voeux Road Central, Hong Kong</i>	Hong Kong	Hong Kong Monetary Authority
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Maybank New York <i>9th Floor, 400 Park Avenue New York N.Y. 10022</i>	United States of America	Federal Reserve Bank/ New York State Bank
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Authority Monetary Brunei Darussalam	Negara Brunei Darussalam	Brunei's Ministry of Finance
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*i. Bandar Seri Begawan Branch
No. 1, Jalan McArthur
Bandar Seri Begawan
BS8711*

*ii. Seria Service Centre
8, Jalan Sultan Omar Ali
Seria 7087, PO Box 524
Seria 7005*

*iii. Gadong Service Centre
Unit 1 & 2, Tingkat Bawah
Bangunan Halimatul Saadiah
Jalan Gadong
Bandar Seri Begawan BE4119*

Annex I

ADDRESS	COUNTRY	LOCAL BANKING AUTHORITY
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Overseas Branches

Maybank Cambodia

*No. 4B, Street 114 (Kramoun Sar)
Sangkat Phsar Thmey 1
Khan Daun Penh
Phnom Penh (11 sub-branches)*

Cambodia

National Bank of
Cambodia

Vietnam Operations

Vietnam

State Bank of Vietnam

*i. Hanoi Branch
Suite 608
63, Ly Thai To
Hanoi*

*ii. Ho Chi Minh City Branch
9th Floor, Sun Wah Tower
115, Nguyen Hue Boulevard
District 1
Ho Chi Minh City*

Maybank Laos

*Lot 34, 45 & 47,
Lane Xang Avenue
Hatsady Village, Chanthabouly District
P.O. Box 1663, Vientiane Lao PDR*

Lao People's
Democratic
Republic

National Bank of Laos

China

China

China Banking
Regulatory Commission
and People's Bank of
China

*i. Maybank Shanghai
15th Floor, Marine Tower
No. 1, Pudong Avenue
Shanghai 200120*

*ii. Maybank Beijing
Suite 1608 Level 16
China World Tower
China World Tower Trade Centre
No. 1, Jianguomenwai Avenue
Beijing 100004*

Singapore Operations

Singapore

Monetary Authority of
Singapore

*2, Battery Road,
Maybank Tower
049907
(22 branches)*

Annex I

ADDRESS	COUNTRY	LOCAL BANKING AUTHORITY
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Overseas Branches

Maybank Bahrain <i>8th Floor, Al Jasra Tower Diplomatic Area P.O. Box 10470 Manama</i>	Kingdom of Bahrain	Central Bank of Bahrain
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Overseas Subsidiaries

Maybank International (L) Ltd Mayban International Trust (L) Bhd <i>16th Floor (B), Main Office Tower Financial Park Labuan Jalan Merdeka 87000 Federal Territory, Labuan</i>	Malaysia	Labuan Financial Services Authority
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PT Bank Maybank Syariah Indonesia <i>1st – 3rd Floor, Sona Topas Tower Jalan Jenderal Sudirman Kav. 26 12920 Jakarta</i>	Indonesia	Bank Indonesia
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Maybank (PNG) Limited <i>i. Port Moresby Corner Waigani Road/Islander Drive P.O.Box 882, Waigani, National Capital Drive</i> <i>ii. Lae Branch 4th Street, Ground Floor, Vele Rumana Building PO Box 874, Lae Morobe Province</i>	Malaysia	Labuan Financial Services Authority
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Maybank Philippines Incorporated <i>Legaspi Towers 300 Roxas Boulevard Corner P.Ocampo Sr. Street Malate Manila 1004 Philippines (50 branches)</i>	Philippines	Bangko Sentral ng Pilipinas
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Annex I

ADDRESS	COUNTRY	LOCAL BANKING AUTHORITY
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Overseas Subsidiaries

Bank Internasional Indonesia (BII) <i>Plaza BII Tower 2, Jl. M. H. Thamrin No. 51, Jakarta 10350, Indonesia (236 branches)</i>	Indonesia	Bank Indonesia
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Associate Companies

MCB Bank Limited <i>MCB Building (E-6/G-6) Jinnah Avenue Islamabad Pakistan (1092 branches)</i>	Pakistan	State Bank of Pakistan
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An Binh Bank <i>78 – 80 Cach Mang Thang Tam Street, Ward 6, District 3, Ho Chi Minh City, Vietnam (96 branches)</i>	Vietnam	State Bank of Vietnam
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Global USA Patriot Act Certification

CERTIFICATION REGARDING CORRESPONDENT ACCOUNTS FOR FOREIGN BANKS

[OMB Control Number 1505-0184]

The information contained in this Certification is sought pursuant to Sections 5318(j) and 5318(k) of Title 31 of the United States Code, as added by sections 313 and 319(b) of the USA PATRIOT Act of 2001 (Public Law 107-56).

This Certification should be completed by any **foreign bank** that maintains a **correspondent account** with any U.S. bank or U.S. broker-dealer in securities (a **covered financial institution** as defined in 31 C.F.R. 103.175(f)). An entity that is not a foreign bank is not required to complete this Certification.

A **foreign bank** is a bank organized under foreign law and located outside of the United States (see definition at 31 C.F.R. 103.11(o)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions, credit unions, and other organizations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31 C.F.R. 103.11(c)).*

A **Correspondent Account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf of a foreign bank, or handle other financial transactions related to the foreign bank.

Special instruction for foreign branches of U.S. banks:

A branch or office of a U.S. bank outside the United States is a foreign bank. Such a branch or office is not required to complete this Certification with respect to Correspondent Accounts with U.S. branches and offices of the same U.S. bank.

Special instruction for covering multiple branches on a single Certification:

A foreign bank may complete one Certification for its branches and offices outside the United States. The Certification must list all of the branches and offices that are covered and must include the information required in Part C for each branch or office that maintains a Correspondent Account with a Covered Financial Institution. Use attachment sheets as necessary.

A. The undersigned financial institution, Malayan Banking Berhad ("**Foreign Bank**") hereby certifies as follows:

*A "foreign bank" does not include any foreign central bank or monetary authority that functions as a central bank, or any international financial institution or regional development bank formed by treaty or international agreement.

B. Correspondent Accounts Covered by this Certification: Check **one** box.

- This Certification applies to all accounts established for Foreign Bank by Covered Financial Institutions.
- This Certification applies to Correspondent Accounts established by _____ [name of Covered Financial Institution(s)] for Foreign Bank.

C. Physical Presence/Regulated Affiliate Status: Check **one** box and complete the blanks.
Please refer to Annex I.

- Foreign Bank maintains a physical presence in any country. That means:
- Foreign Bank has a place of business at the following street address: 14th Floor, Menara Maybank, 100 Jalan Tun Perak, 50050 Kuala Lumpur, where Foreign Bank employs one or more individuals on a full-time basis and maintains operating records related to its banking activities.
 - The above address is in Malaysia (insert country), where Foreign Bank is authorized to conduct banking activities.
 - Foreign Bank is subject to inspection by Central Bank of Malaysia (insert Banking Authority), the banking authority that licensed Foreign Bank to conduct banking activities.
- Foreign Bank does not have a physical presence in any country, but Foreign Bank is a **regulated affiliate**. That means:
- Foreign Bank is an affiliate of a depository institution, credit union, or a foreign bank that maintains a physical presence at the following street address: _____, where it employs one or more persons on a full-time basis and maintains operating records related to its banking activities.
 - The above address is in _____ (insert country), where the depository institution, credit union, or foreign bank is authorized to conduct banking activities.
 - Foreign Bank is subject to supervision by _____, (insert Banking Authority), the same banking authority that regulates the depository institution, credit union, or foreign bank.
- Foreign Bank does not have a physical presence in a country and is not a regulated affiliate.

D. Indirect Use of Correspondent Accounts: Check box to certify.

- No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. Foreign Bank hereby certifies that it does not use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

E. Ownership Information: Check box 1 or 2 below, **if applicable.**

1. Form FR Y-7 is on file. Foreign Bank has filed with the Federal Reserve Board a current Form FR Y-7 and has disclosed its ownership information on Item 4 of Form FR Y-7.
2. Foreign Bank's shares are publicly traded. Publicly traded means that the shares are traded on an exchange or an organized over-the-counter market that is regulated by a foreign securities authority as defined in section 3(a)(50) of the Securities Exchange Act of 1934 (15 U.S.C. 78c(a)(50)).

If **neither** box 1 or 2 of Part E is checked, complete item 3 below, **if applicable**

3. Foreign Bank has no **owner(s)** except as set forth below. For purposes of this Certification, **owner** means any person who, directly or indirectly, (a) owns, controls, or has power to vote 25 percent or more of any class of voting securities or other voting interests of Foreign Bank; or (b) controls in any manner the election of a majority of the directors (or individuals exercising similar functions) of Foreign Bank. For purposes of this Certification, (i) **person** means any individual, bank, corporation, partnership, limited liability company or any other legal entity; (ii) **voting securities or other voting interests** means securities or other interests that entitle the holder to vote for or select directors (or individuals exercising similar functions); and (iii) members of the same family * shall be considered one **person**.

Name	Address

* The same family means parents, spouses, children, siblings, uncles, aunts, grandparents, grandchildren, first cousins, stepchildren, stepsiblings, parents-in-law and spouses of any of the foregoing. In determining the ownership interests of the same family, any voting interest of any family member shall be taken into account.

F. Process Agent: complete the following.

The following individual or entity:

Malayan Banking Berhad is a resident of the United States at the following street address: 9th Floor, 400 Park Avenue, New York NY 10022 and is authorized to accept service of legal process on behalf of Foreign Bank from the Secretary of the Treasury or the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

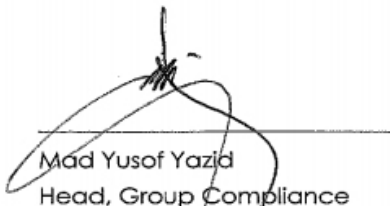
E. General

Foreign Bank hereby agrees to notify in writing each Covered Financial Institution at which it maintains any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

Foreign Bank understands that each Covered Financial Institution at which it maintains a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the United States. Foreign Bank further understands that the statements contained in this Certification may be transmitted to one or more departments or agencies of the United States of America for the purpose of fulfilling such departments' and agencies' governmental functions.

I, Mad Yusof Yazid., certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorized to execute this Certification on behalf of Foreign Bank.

Malayan Banking Berhad



Mad Yusof Yazid
Head, Group Compliance

Executed on this 26th day of January 2011.