the Wolfsberg Group

Financial Institution Name: Industrial Bank Co., Ltd.

Location: Bople's Republic of China

This questionnaire acts as an aid to firms conducting due diligence and should not be relied on exclusively or excessively. Firms may use this questionnaire alongside their own policies and procedures in order to provide a basis for conducting client due diligence in a manner consistent with the risk profile presented by the client. The responsibility for ensuring adequate due diligence, which may include independent verification or follow up of the answers and documents provided, remains the responsibility of the firm using this questionnaire.

Anti-Money Laundering Questionnaire If you answer "no" to any question, additional information can be supplied at the					
end of the questionnaire.					
I. Ge	eneral AML Policies, Practices and Procedures:	Yes	<u>No</u>		
1.	Is the AML compliance program approved by the FI's board or a senior committee?	Y 0/	No		
2.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y.	No		
3.		Y o	No		
4.	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?	Y.	Νο		
5.	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.)	Y 0	Νο		
6.	Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y o	No		
7.	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y° V	Νο		
8.		Y° V	Νο		
9.	Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	Y°V	No		

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of America, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale, Standard Chartered and UBS which aim to develop frameworks and guidance for the management of financial crime risks particularly with respect to Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

the Wolfsberg Group

	Yes	No
II. Risk Assessment:	-	N o
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y o	
11. Does the FI determine the appropriate level of enhanced due	Yo	No
diligence necessary for those categories of customers and		
transactions that the FI has reason to believe pose a		
heightened risk of illicit activities at or through the FI?		
III. Know Your Customer, Due Diligence and Enhanced		
Due Diligence:	<u>Yes</u>	<u>No</u>
12. Has the FI implemented processes for the identification of those	Yo /	No
customers on whose behalf it maintains or operates accounts or	1/	
conducts transactions?		
13. Does the FI have a requirement to collect information regarding	Yo, /	No
its customers' business activities?	V	
14. Does the FI assess its FI customers' AML policies or practices?	Yo V	No
15. Does the FI have a process to review and, where appropriate,	Yo	No
update customer information relating to high risk client	1/	
information?	U	
16. Does the FI have procedures to establish a record for each new	Yo /	No
customer noting their respective identification documents and	1/	
'Know Your Customer' information?		
17. Does the FI complete a risk-based assessment to understand	Yo. /	No
the normal and expected transactions of its customers?		
IV. Reportable Transactions and Prevention and		
Detection of Transactions with Illegally Obtained Funds:	Yes	<u>No</u>
18. Does the FI have policies or practices for the identification and	Yo,	No
reporting of transactions that are required to be reported to the	1/	
authorities?		
19. Where cash transaction reporting is mandatory, does the FI	Υo	Νο
have procedures to identify transactions structured to avoid	/	
such obligations? 20. Does the FI screen customers and transactions against lists of	Υo	Νο
persons, entities or countries issued by government/competent	1	110
authorities?	Yo /	No
21. Does the FI have policies to reasonably ensure that it only	10,/	14 0
operates with correspondent banks that possess licenses to		
operate in their countries of origin?	V -	No
22. Does the FI adhere to the Wolfsberg Transparency Principles	Yo /	14 0
and the appropriate usage of the SWIFT MT 202/202COV and		
MT 205/205COV message formats? ¹		01-
V. Transaction Monitoring:	Yes	<u>No</u>
23. Does the FI have a monitoring program for unusual and	Yo	Νo
potentially suspicious activity that covers funds transfers and	. /	
monetary instruments such as travelers checks, money orders,		
etc?	1	
	1	

I The four payment message standards to be observed are: i) FIs should not omit, delete, or alter information in payment messages or orders for the purpose of avoiding detection of that information by any other FI in the payment process; ii) FIs should not use any particular payment message for the purpose of avoiding detection of information by any other FI in the payment process; iii) Subject to applicable laws, FIs should cooperate as fully as practicable with other FIs in the payment process when requesting to provide information about the parties involved; and (iv) FIs should strongly encourage their correspondent banks to observe these principles. Source: http://www.wolfsberg-principles.com/pdf/standards/Wolfsberg NYCH Statement on Payment Message Standards (2007).pdf

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of America, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale, Standard Chartered and UBS which aim to develop frameworks and guidance for the management of financial crime risks particularly with respect to Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.

the Wolfsberg Group

VI. AML Training	Yes	No
 24. Does the FI provide AML training to relevant 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. 	Y 0	Νο
Internal policies to prevent money laundering.	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	N1 - 1A
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y°V	No
26. Does the FI communicate new AML related laws or changes to	Yo	No
existing AML related policies or practices to relevant employees?		
27. Does the FI employ third parties to carry out some of the functions of the FI?	Υo	N o
 28. If the answer to question 27 is yes, does the FI provide AML training to relevant third parties that includes: Identification and reporting of transactions that must be reported to government authorities. 	Yo	Νο
 Examples of different forms of money laundering involving the FI's products and services. Internal policies to prevent money laundering. 		
- Internal policies to prevent money laundering.		

Space for additional information:

(Please indicate which question the information is referring to.)
Name: Chen Yongzhen(陈永珍)
Title: Legal and Compliance Dept.
Anti-Money Laundering Center Director
Signature:
Date: February 8,2018

The Wolfsberg Group consists of the following leading international financial institutions: Banco Santander, Bank of America, Bank of Tokyo-Mitsubishi UFJ, Barclays, Citigroup, Credit Suisse, Deutsche Bank, Goldman Sachs, HSBC, JP Morgan Chase, Société Générale, Standard Chartered and UBS which aim to develop frameworks and guidance for the management of financial crime risks particularly with respect to Know Your Customer, Anti-Money Laundering and Counter Terrorist Financing policies.