

AML/CTF Questionnaire

I General Information

Please confirm the areas of your organization covered by responses to this survey:			
Head Office & domestic branches:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Domestic subsidiaries:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Overseas branches:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Overseas subsidiaries:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Legal name	China Construction Bank Corporation		
Legal form	State-owned shareholding Company		
Legal address	No. 25 Finance Street, Xicheng District, Beijing, China		
Numbers of license(s)	1000001003912		
Corporate registration or identification number	100000000039122		
Banking license registration number	B0004H111000001		
Tax identification number	京税证字 110102100004447		
Date and place of first incorporation	17 September 2004 State Administration for Industry & Commerce of the People's Republic of China		
Primary line of business	Commercial Banking		
Name of regulator	The People's Bank of China China Banking Regulatory Commission		
External auditor	PWC		
web page	www.ccb.com		

<p>1. Does the financial institution have a “physical presence” or are you a regulated affiliate of an entity with a “physical presence”?</p> <p><i>For the purposes of this questionnaire “physical presence” means a place of business:</i></p> <ul style="list-style-type: none"> • <i>located at a fixed address (other than solely an electronic address, a post office address or an accommodation address); and</i> • <i>in a country in which the bank is authorised to conduct banking activities; and</i> • <i>where the bank employs 1 or more individuals full-time and maintains operating records related to banking activities; and</i> <p><i>where the bank is subject to inspection by the banking authority which licensed the bank to conduct banking activities.</i></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>2. Is the institution subject to laws and regulations designed to prevent money laundering and terrorists financing in line with the Financial Action Task Force?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>3. Is the institution required to verify the identity of its customers and apply AML/CFT controls to Financial Action Task Force standards?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>4. Is the financial institution publicly owned?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>5. Is the financial institution listed on any stock exchange? If yes, which? And what's the name of exchange (s)?</p> <p><u>The Stock Exchange of Hong Kong Limited</u> <u>Shanghai Stock Exchange</u></p> <p><u>A-share: Shanghai Stock Exchange</u> <u>Stock abbreviation: 建设银行</u> <u>Stock code: 601939</u></p> <p><u>H-share: The Stock Exchange of Hong Kong Limited</u> <u>Stock abbreviation: CCB</u> <u>Stock code: 939</u></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>6. OWNERSHIP AND MANAGEMENT Name(s) of all the directors of the institution. Details of ownership, corporate form and location of owners and ultimate beneficial owners - List of all shareholders or beneficial owners in excess of 10%.</p>	<p>The information updates in the CCB Annual Report, which You can find on http://www.ccb.com/en/newinvestor/annals.html</p>

II General AML Policies, Practices and Procedures

<p>7. Is money laundering and terrorist financing considered as crimes in your local laws/legislation?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>8. Is the financial institution subject to such AML laws/regulation?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>9. Does the financial institution have a policy and procedures for prevention of money laundering and terrorist financing?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>10. Does the AML compliance program require approval of the financial institution's board or a senior committee thereof?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>

11. Does the board or senior management receive AML/CTF management information (MI)? If yes, how often does the board or senior management receive this MI? <u>At least once a year.</u>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
12. Has your institution appointed a senior officer responsible for its AML/CFT program?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
13. Does the financial institution have a formal / independent anti-money laundering compliance function?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
14. Are the institution's AML policies and practices being applied to all branches and subsidiaries of the institution's both in the home country and in locations outside of that jurisdiction?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
15. Does the financial institution have appropriate record retention procedures pursuant to applicable law? If yes, how long does the financial institution keep the record? <u>Client identity information should be maintained for at least 5 years since the year in which a business relationship ends or the booking year of a once-for-all transaction.</u> <u>The transaction record should be kept for at least 5 years since the booking year of a transaction.</u>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
16. Does the financial institution have documented policies outlining the processes that have been implemented to prevent, detect and report suspicious transactions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
17. Does the financial institution have documented policies outlining the processes regarding escalation of financial crime risk issues including, where appropriate, customer exits?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
18. Does the financial institution have a formal exit process to deal with those customers it deems to represent unacceptable money laundering/terrorist financing/sanctions/bribery and corruption risk?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

III KYC, Due Diligence and Risk Assessment

19. Does the financial institution have written policies and procedures regarding Know Your Customer (KYC) and AML matters that are in compliance with applicable local laws and regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
i. Is the KYC process centralized (as opposed to the branches conducting their own KYC)? If No, is there a centralized review or quality assurance function?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
ii. Does this process differ for clients with different risk ratings?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
iii. Is KYC information reviewed and updated on a periodic basis?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
iv. Does the financial institution conduct KYC due diligence for all clients at on-boarding?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
20. Does the financial institution have procedures to establish a record for each customer noting their respective identification documents and Know	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Your Customer Information collected at account opening?	
21. Does the financial institution's regulations/ directives require the recognition of the true identity of customers and the origin of their funds prior to providing accounts?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
22. Does the financial institution review source of wealth when conducting due diligence on new customers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
23. Does the financial institution have a policy that prohibits customers from maintaining anonymous accounts (i.e. numbered accounts for which the financial institution does not know the owner)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
24. Does the financial institution have a policy that carry out ML/TF risk assessment on customers?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
25. Does the financial institution have a risk assessment methodology to assess the AML/financial crime risk posed by its customers and their transactions? i. If Yes, what factors/criteria are used to determine the customer's risk classification (Please mark all that apply)? <input checked="" type="checkbox"/> Country <input checked="" type="checkbox"/> Product(s) utilized <input checked="" type="checkbox"/> Business activity / industry <input checked="" type="checkbox"/> Other ii. Are there any categories of customers that are prohibited? iii. Are there any particular industries / geographies identified as high risk by your AML Program?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
26. Does the financial institution apply enhanced due diligence policies and procedures in connection with higher risk clients?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
27. Does the financial institution apply enhanced due diligence policies and procedures in connection with PEP (politically exposed persons)? Is there a time limit for when a PEP ceases to be classified as a PEP?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
28. Does the institution determine the appropriate level of enhanced due diligence (EDD) necessary for those categories of customers and transactions that the institution has reason to believe pose a heightened risk of illicit activities at or through the institution?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
29. Has the institution implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
30. Does the institution have a requirement to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
31. Does the institution complete a risk-based assessment to understand the normal and expected transactions of its customers? i) On-boarding? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No ii) KYC renewal? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
32. Does the institution have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

33. Does the institution carry out transactions for customers who do not hold accounts with your institution?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
34. Which Sanctions lists are used for screening (Please mark all that apply)? <input checked="" type="checkbox"/> OFAC <input checked="" type="checkbox"/> UN <input checked="" type="checkbox"/> EU <input checked="" type="checkbox"/> HM Treasury <input checked="" type="checkbox"/> HKMA <input checked="" type="checkbox"/> Local <input checked="" type="checkbox"/> Other	
35. Which of the below are screened against these sanctions lists (please mark all that apply): <input checked="" type="checkbox"/> Customers <input checked="" type="checkbox"/> Connected parties <input checked="" type="checkbox"/> Domestic Transactions <input checked="" type="checkbox"/> International Transactions	

IV Correspondent Banking/Accounts

36. Does the financial institution establish accounts/ relationships with shell banks? (A shell bank defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulates financial group.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
37. Does the financial institution have a policy that prohibits the establishment of accounts/ relationships with shell banks?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
38. Does the institution have policies to reasonably ensure it will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
39. Does the financial institution have policies to ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

V Transaction Monitoring , Reporting

40. Is the financial institution subjected to regulatory requirements on reporting of suspicious activities and large cash transaction? If yes, which authority is in charge of receiving suspicious activity reports and large cash transaction reports? <u>China Anti-Money Laundering Monitoring & Analysis Center</u>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
41. Does the financial institution have policies, practices and/or a monitoring program for the identification and reporting of transactions that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
42. Are cash transactions covered by automated AML transaction monitoring?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
43. Does the institution have automated systems to screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities (for example: UN, UK, EU, OFAC sanctions lists)? If no, please select your AML transaction monitoring process (Please mark	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<p>all that apply):</p> <p>i. <input checked="" type="checkbox"/> Automated <input checked="" type="checkbox"/> Manual <input type="checkbox"/> Other</p> <p>ii. <input checked="" type="checkbox"/> Account level <input checked="" type="checkbox"/> Branch level <input checked="" type="checkbox"/> Customer level <input type="checkbox"/> Other</p> <p>iii. <input checked="" type="checkbox"/> Rules/Scenarios based <input checked="" type="checkbox"/> Threshold based <input type="checkbox"/> Other</p>	
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VI Institutional Risk Assessment

44. Does the financial institution have a documented policy and procedures for performing institutional AML/CFT risk assessment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
45. Does the financial institution have a documented methodology for performing institutional AML/CFT risk assessment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>i. If Yes, what factors/criteria are used to determine the institution's risk classification (Please mark all that apply)?</p> <p><input checked="" type="checkbox"/> Customer <input checked="" type="checkbox"/> Product(s) and Services <input checked="" type="checkbox"/> Geography</p> <p><input checked="" type="checkbox"/> Business Strategies <input type="checkbox"/> Other</p>	
46. Have the Financial Institution ever conducted an institutional risk assessment?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

VII AML training and others

47. Does the financial institution train its staff on KYC and AML policies and procedures?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>If yes, what does the training frequency?</p> <p><u>At least once a year</u></p>	
48. Does the financial institution provide targeted AML/CTF training that is targeted to specific roles, responsibilities and activities?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
49. Does the financial institution train its new staff on KYC and AML policies and procedures?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
50. Does the financial institution have policies to communicate new AML/CTF related laws or changes to all relevant employees, and provide trainings if needed?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
51. Does the institution retain records of its training sessions including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

VIII Independent Auditing and Findings

52. Has the Financial Institution ever been examined by regulatory bodies or agents?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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53. In addition to inspections by the government supervisors/regulators, does the financial institution have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?

Yes No

If yes, how frequently are these audits conducted?

At least once a year.

Financial Institution Authorized Signer:

Feng Xilai

General Manager

Name

Official Title



2017年8月23日

Signature

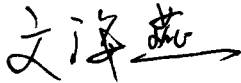
Date

Wen Haiyan

Deputy General Manager

Name

Official Title



2017年8月23日

Signature

Date