

Answer form to be returned by email to the Round Table Working Group for the attention of:
 Xavier Leydier, x.leydier@banquehavilland.com

Name:

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Will participate on the Round Table discussion on “Risk Based Approach” on 18th October 2010

Yes

No

NB: The answers to this questionnaire will remain confidential. They will be analysed on an anonymous basis. The statistics issued from this analysis will be published without any reference to the name of the respondent or of the institution he/she is working for.

Institution :

- | | | |
|---|-------------------------------------|--|
| <input type="radio"/> Bank | <input type="radio"/> Insurance Co. | <input type="radio"/> Asset Management Company |
| <input type="radio"/> Fund Administration Company | | <input type="radio"/> Other |

Risk based approach: How is it implemented?

Has your institution implemented a risk based approach process for accepting new clients?

..... **Yes** **No**

If yes, and should your institution belong to an international group, is a local process applicable? **Yes** **No**

Do you have to implement the “group” criteria?: **Yes** **No**

Has your institution been granted with flexibility in the implementation of the group criteria? **Yes** **No**

Is your risk based approach process

Static (independent criteria): **Yes** **No**

Matrix (criteria having influence one to the other and to which some weighting coefficient applies): **Yes** **No**

Does your institution apply for exclusion criteria to some potential new clients?

..... **Yes** **No**

If yes, on which basis :

Geographical **Yes** **No**

Business/ occupation **Yes** **No**

Predicted activities with the institution **Yes** **No**

Origin of funds **Yes** **No**

Legal structure of the owner of the account **Yes** **No**

Other

Does your institution apply for a specific additional process to the potential new PEP clients at the time of entering into business relationship or specific regular controls to existing PEP clients? **Yes** **No**

Has a new client acceptance committee been implemented within your institution?

..... **Yes** **No**

If yes, what are the rules of such committee?

Veto	Yes	No
Requirement of the unanimity of the committee members	Yes	No
Circular resolution	Yes	No
Resolution in formal meetings	Yes	No
Other	Yes	No

Are the following business lines part of the acceptance process?

Front	Yes	No
Executive Committee	Yes	No
Compliance	Yes	No
Other		
In which way?		

Are risk criteria applied in the review of the following accounts?

Dormant accounts	Yes	No
Hold mail accounts	Yes	No
Pseudonyms' / numbered accounts	Yes	No
Transitory account (internal & external)	Yes	No

Are risk criteria applied to the documentation on which a decision is taken (Client Due Diligence documentation)?

Type of criteria: authenticity, origin, language...

On which kind of criteria is the review of the client files based?

Geographical	Yes	No
Type of Business of the Ultimate Beneficial Owner / Client	Yes	No
Type of clients (individual, Corporation, trust, etc)	Yes	No
Type of transactions	Yes	No
Threshold of transactions	Yes	No
Mix of above	Yes	No

What is the periodicity of the account review?

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O I wish the following topics to be addressed during this Round Table discussion:

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