

1. General Information

Full Name of Institution:	BRAC Bank PLC
Registered Address:	Anik Tower, 220/B Tejgaon Gulshan Link Road, Tejgaon, Dhaka-1208, Bangladesh
Web Address:	www.bracbank.com
SWIFT Address:	BRAKBDDH
Jurisdiction under which incorporated:	Bangladesh
Institution License/Registration No:	BRPD (LS-1) /745 (50) / 2023 - 8418
Number of Branches:	187 (As on 31 December, 2024)
Number of subsidiaries:	04 (As on 31 December, 2024)
Name of External Auditors:	A. Qasem & Co. Chartered Accountants
Name of your Central Bank/Regulatory Body:	Bangladesh Bank
Credit Rating:	Moody's: "B2" S&P: "B+" CRAB: Long Term: "AAA"; Short Term: "ST-1"
Main Business	SME, Retail, Corporate, Trade Finance, Treasury & Remittances
Specific laws and / or regulations covering AML	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any specific laws and/or regulations in place covering Anti-Money Laundering?	Please list them: Money Laundering Prevention Act 2012 (Amendment)-2015; Anti- Terrorism Act 2009 (Amendment)-2012 & 2013

2. Ownership Structure and Management Information

1. Is your institution a Public Company?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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<p>2. Is your institution listed on any exchange?</p>	<p style="text-align: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please state which exchange? Dhaka Exchange Stock and Chittagong Stock Exchange</p>
<p>3. Major shareholders: Please list all of your institution's major shareholders with shareholding greater than 5%.</p>	<p>Only, BRAC as an institutional shareholder holds 46.17% (As on 31 December, 2024) of the total share of the bank.</p>
<p>4. Are there any Politically Exposed Persons (PEPs) within the Shareholders, Members of the Board of Directors or Senior Management of the Bank?</p>	<p style="text-align: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If Yes, please state Name, Nationality and Function:</p>

3. Anti-Money Laundering / Counter-Financing of Terrorism

I. <i>General AML Policies, Practices and Procedures:</i>	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
8. Does the FI have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
10. Does your financial institution offer Payable-Through-Account ("PTA") services or accounts to any of your customers?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

II. <i>Risk Assessment:</i>	Yes	No
11. Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
12. Does the FI determine the appropriate level of enhanced due 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

III. Know Your Customer, Due Diligence and Enhanced Due Diligence:	Yes	No
13. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or * Conducts transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
14. Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
15. Does the FI assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
16. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client Information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
18. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:	Yes	No
19. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the Authorities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
20. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid Such obligations?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
21. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent Authorities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
22. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to Operate in their countries of origin?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23. Does FI adhere to the Wolfsberg Transparency Principles and appropriate usage of SWIFT MT 202/202COV and MT 205\205COV message formats?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

V. Transaction Monitoring:	Yes	No
24. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
VI. AML Training	Yes	No
25. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ 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. ▪ Internal policies to prevent money laundering. 	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
26. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

27. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
28. Does the FI employ third parties to carry out some of the functions of the FI?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
29. If the answer to question 28 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ 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. ▪ Internal policies to prevent money laundering. 	<input type="checkbox"/> Yes	<input type="checkbox"/> No

GENREAL

Does the responses provided in this Declaration applies to the following entities:

Yes No

- Head Office and all domestic branches
- Overseas branches
- Domestic subsidiaries
- Overseas subsidiaries

If the response to any of the above is "No", please provide a list of the branches and /or subsidiaries that are excluded, including the name of the institution, location and contact details.

I, the undersigned, confirm to the best of my knowledge that the information provided in this questionnaire is current, accurate and representative of the anti-money laundering and anti-terrorist financing policies and procedures that are established in my institution.

I also confirm that I am authorized to complete this questionnaire on behalf of my institution.

Signature:	
Name:	Chowdhury Moinul Islam
Designation:	DMD and Chief Anti Money Laundering Compliance Officer
Date:	January 08, 2025
Contact No:	+880 9677552028
Email:	chowdhurymoinul.islam@bracbank.com

