

Financial Institution Name: BPD Bank

Location: 90 Broad Street, New York, NY 10004, USA

	Anti-Money Laundering Questionn	aire	
I. G	eneral AML Policies, Practices and Procedures:	Yes	No
	Is the AML compliance program approved by the FI's board or a senior committee?	YES	1100
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?	YES	
	Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES	
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?	YES	
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.)	YES	
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?	YES	
7.	Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	YES	
8.	Does the FI have record retention procedures that comply with applicable law?	YES	
	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?	YES	
	Lisk Assessment Does the FI have a risk-based assessment of its customer base and their transactions?	Yes YES	<u>No</u>
	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?	YES	
	Know Your Customer, Due Diligence and Enhanced Diligence	Yes	<u>No</u>
	. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	YES	



13. Does the FI have a requirement to collect information regarding its customers' business activities?	YES	
14. Does the FI assess its FI customers' AML policies or practices?	YES	
15. Does the FI have a process to review and, where appropriate,	YES	
update customer information relating to high risk client		
information?		
16. Does the FI have procedures to establish a record for each new	YES	
customer noting their respective identification documents and	,	
'Know Your Customer' information?		
17. Does the FI complete a risk-based assessment to understand	YES	
the normal and expected transactions of its customers?		
IV. Reportable Transactions and Prevention and		
Detection of Transactions with Illegally Obtained Funds	<u>Yes</u>	<u>No</u>
18. Does the FI have policies or practices for the identification and	YES	1
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reporting of transactions that are required to be reported to the		
authorities?	VEC	<u> </u>
19. Where cash transaction reporting is mandatory, does the FI	YES	
have procedures to identify transactions structured to avoid		
such obligations?	VEC	
20. Does the FI screen customers and transactions against lists of	YES	
persons, entities or countries issued by government/competent		
authorities?	\	
21. Does the FI have policies to reasonably ensure that it only	YES	
operates with correspondent banks that possess licenses to		
operate in their countries of origin?		
V. Transaction Monitoring	<u>Yes</u>	No
22. Does the FI have a monitoring program for unusual and	YES	
potentially suspicious activity that covers funds transfers and		
monetary instruments such as travelers checks, money orders,		
etc?		
VI. AML Training	<u>Yes</u>	<u>No</u>
23. Does the FI provide AML training to relevant employees that	YES	
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.		
 Internal policies to prevent money laundering. 		
24. Does the FI retain records of its training sessions including	YES	
attendance records and relevant training materials used?		
25. Does the FI communicate new AML related laws or changes to	YES	
existing AML related policies or practices to relevant		
employees?		
26. Does the FI employ third parties to carry out some of the	YES	
functions of the FI?		
27. If the answer to question 26 is yes, does the FI provide AML	YES	
training to relevant third parties 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.		
 Internal policies to prevent money laundering. 		

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Name:	Ivan Georgiev	
Title:	BSA Officer	
Signature:		
Date:	May 12, 2010	