



Anti-Money Laundering Questionnaire

If you answer "no" to any of the questions listed below, additional information can be supplied at the end of the questionnaire.

I. Basic Information

1. Full legal name	Central Bank of Egypt (CBE)
2. Legal address	54 El-Gomhoria St. Cairo, Egypt
3. Contact address	<p>Name: Mostafa Elnaggar Position: Assistant Sub-Governor Organization Name: Central Bank of Egypt Organization Address: 54 El-Gomhoria St. Cairo, Egypt Telephone: +202 2770 1406 Fax: +202 2597 6046 Cell phone: +2010 0750 704 E-mail: Mostafa.Elnaggar@cbe.org.eg SWIFT Address: CBEGEGCXAXXX</p>
4. Legal status (publicly held or privately owned; are your shares listed, if yes, on which stock exchange)	CBE is a public legal person, directly subject to the President of the Republic
5. Type of license for performing banking operations, issuing body	CBE is the sole issuer of the offshore banking license
6. List of jurisdictions where your subsidiaries are located	Alexandria, Egypt Port-Said, Egypt
7. Registration number, date of registration	Not Applicable
8. Ownership structure	Governmental
9. Management's structure; do you have any politically exposed persons in management?	No
10. Your latest agency ratings	Not Applicable
11. Number of employees	6,000
12. Number of branches	2
13. Principle lines of business	<ol style="list-style-type: none"> 1. Issuing banknotes and determining their denominations and specifications, pursuant to the provision of Article (8) of this Statute. 2. Managing liquidity in the national economy, and conducting open market operations. 3. Issuing securities commensuration with the nature of its funds and activities, as decided by its Board of Directors. Such securities shall bear the signature of the Governor.



	<ol style="list-style-type: none">4. Influencing banking credit in a way arranging the fulfillment of the actual needs of the different aspects of economic activity.5. Supervising the units of the banking sector.6. Managing the gold and foreign exchange reserves of the State.7. Regulating and managing the foreign exchange market.8. Supervising the national payments system.9. Recording and following up the external debt on the government, the economic and service authorities, the public sector, the public business sector, and the private sector, according to the forms to be set by the Board of Directors of the Bank.
<p>14. Name of local regulatory body regulating your activity</p>	<ol style="list-style-type: none">1. The Egyptian Anti-Money Laundering and Combating Terrorist Finance; the local regulator for all financial institutions.2. CBE is the regulator for Banks, Exchange Bureaus and Money Transmission companies.



II. General AML Policies, Practices and Procedures:		YES	NO
15.	Is the Anti-Money Laundering (AML) compliance program approved by the Financial Institutions (FIs) board or a senior committee?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.	Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordination and overseeing of the AML framework?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17.	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"/>	<input type="checkbox"/>
18.	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"/>	<input type="checkbox"/>
19.	Does the FI have a policy prohibiting accounts/relationships with shell banks? (<i>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.</i>)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20.	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"/>	<input type="checkbox"/>
21.	Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22.	Does the FI have record retention procedures that comply with applicable law?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23.	Are the FIs 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"/>	<input type="checkbox"/>
III. Risk Assessment		YES	NO
24.	Does the FI have a risk-based assessment of its customer base and their transactions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
25.	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"/>	<input type="checkbox"/>
IV. Know Your Customer, Due Diligence and Enhanced Due Diligence		YES	NO
26.	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions? (Not Applicable)	<input type="checkbox"/>	<input type="checkbox"/>
27.	Does the FI have a requirement to collect information regarding its customer's business activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
28.	Does the FI assess its FI customers AML policies or practices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
29.	Does the FI have process to review and, where appropriate, update customer information relating to high risk client information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
30.	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" (KYC) information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
31.	Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

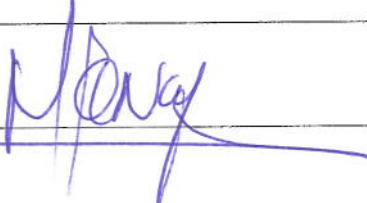
V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds	YES	NO
32. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
33. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
34. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
35. 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"/>	<input type="checkbox"/>
VI. Transaction Monitoring	YES	NO
36. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller's checks, money orders, etc.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VII. AML Training	YES	NO
37. 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 FIs products and services. ▪ Internal policies to prevent money laundering. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
38. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
39. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
40. Does the FI employ third parties to carry out some of the functions of the FI?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
41. If the answer to question 40 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, payable through accounts. ▪ Examples of different forms of money laundering involving the FIs products and services. ▪ Internal policies to prevent money laundering. <p style="text-align: right;">(Not Applicable)</p>	<input type="checkbox"/>	<input type="checkbox"/>
VIII. Certification	YES	NO
42. We hereby certify that we do not run accounts for financial institutions who do not maintain a physical presence in any country and do not conduct transactions with or on behalf such financial institutions through any of its accounts or products. We also certify that we do not admit payable through accounts.	<input checked="" type="checkbox"/>	<input type="checkbox"/>



Space for additional information:

(Please indicate which question the information is referring to)

- 1. The FATF-Style regional body:** Egypt is a founding member of MENAFATF (Middle East & North Africa Financial Action Task Force)
- 2. The ML risk in the CBE is very low due to:**
 - a. CBE Employees**
 - i. It is not allowed to open accounts for non-working members of the Bank.
 - ii. The maximum standards of security clearance are applied during the hiring processes with CBE which is part of KYC.
 - b. Government entities**
 - i. Accounts are not opened to other than government entities. No commercial accounts allowed.
 - c. Our website (www.cbe.org.eg)** can assist you in answering any further inquires.

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Title:	Assistant Sub-Governor / Compliance Officer
Signature:	
Date:	18/02/2010