

FOREIGN FINANCIAL INSTITUTION DUE DILIGENCE QUESTIONNAIRE

		Account Number:					
Nam	Name of Account						
Pleas	Please answer all questions as completely as possible. Please use additional pages as necessary and refer to the question number.						
1	Describe the nature of the foreign financial institution's business and the market it serves:						
2	List the primary geographic market(s) served by the foreign financial institution, including specific countries and regions. (include countries/regions that account for more than 10% of your business)						
2A	Is the primary geographic market(s) served different from that of the country the foreign financial institution is located/incorporated?	YES NO					
2B	If so, does the primary geographic market(s) contain countries in a higher risk category than the country of incorporation/location?	YES NO					
3	Describe the type, purpose, and anticipated activity of the account:						
4	Describe the nature and duration of Fenix Securities relationship with the foreign financial institution (and any of its affiliates):						
5	Identify the AML and supervisory regime of the jurisdiction that issued the foreign financial institution's charter/license:						
6	Does the foreign financial institution have an annual independent audit of their AML Program?	YES NO If yes, have any of the audits resulted in a less than satisfactory rating?					
7	Does the foreign financial institution's AML program cover the following:	Customer Identification Program ("CIP")					
		Know Your Customer ("KYC") YES NO Screening of names against various lists YES NO					
		Screening for Politically Exposed Persons ("PEPs") YES NO					
8	Identify information known or reasonably available to the firm about the foreign financial institution's AML record: (including public information in standard guides, periodicals and major publications)						
9	Is this correspondent a foreign bank or will it establish accounts for a foreign bank or banks requiring enhanced due diligence?	YES NO 31 CFR 103.176 (c) defines a foreign bank requiring enhanced due diligence as a foreign bank that operates under: (1) an offshore banking license; (2) a banking license issued by a foreign country that has been designated as non-cooperative with international antimoney laundering principles or procedures by an intergovernmental group or organization of which the United States is a member and with which designation the U.S. representative to the group or organization concurs: or (3) a banking license issued by a foreign country that has been designated by the Secretary of the Treasury as warranting special measures due to money laundering concerns.					
Please answer all questions as completely as possible. Please use additional pages as necessary and refer to the question number							
10	Do you have a copy of the foreign bank's anti-money laundering policy?	YES NO If the correspondent is not a foreign bank but will establish such accounts as stated above, does the correspondent have procedures in place to obtain copies of the bank's anti-money laundering policies prior to the time of account opening?					

		prior to the time of account opening?
11	What procedures are in place to monitor transactions to, from, or through the correspondent account that are reasonably designed to detect money laundering and suspicious activity?	

Client Approval:

Signature	Print Name	Title	Date
×			
Signature	Print Name	Title	Date
x			