BANCO NACIONAL DE COMERCIO EXTERIOR, S. N. C.
Banca de Desarrollo

BANCOMEXT

Anti – Money Laundering Questionnaire

Financial Institution Name:	**Banco Nacional de Comercio Exterior, S.N.C.**		
Address of Principal Location:	**Periférico Sur 4333, Col. Jardines en la Montaña, Delegación Tlalpan, C.P. 14210, México, D.F.**		
Name and Title of Individual completing this questionnaire:	**Víctor Manuel Jiménez García** **Officer Compliance**		
Date this questionnaire was completed:	**January, 2014**		
Name of principal regulator:	**Ministry of Finance and Public Credit trought National Banking and Securities Commission**		
Has your institution appointed a senior office responsible for its Anti-Money Laundering and Anti-Terrorist Financing program?		**Yes**	**No**
		X	
Do the responses provided below apply to			

I. General AML Policies, Practices and Procedures:	**Yes**	**No**
1. Does the AML compliance program require approval of the FI's Board or a senior committee thereof?	X	
2. Does the FI have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?	X	
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	X	
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?	X	
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.)?	X	
6. Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	X	
7. Does the FI have appropriate record retention procedures pursuant to applicable law?	X	
8. Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	X	

II. Risk Assessment	Yes	No
9. Does the FI have a risk focused assessment of its customer base and transactions of its customers?	X	

10. 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?	X	

III. Know your customer, Due Diligence and Enhanced Due Diligence	Yes	No
11. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc… (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country / state that issued it)?	X	
12. Does the FI have a policy that prohibits customers from maintaining anonymous accounts, i.e. numbered accounts for which the FI does not know the owner?	X	
13. Does the FI have a requirement to collect information regarding its customers business activities?	X	
14. Does the FI collect information and assess its FI customers AML policies or practices?	X	
15. Does the FI have procedures to establish a record for each customer noting their respective identification documents and know your customer information collected at account opening?	X	
16 Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	X	

IV. Reportable Transactions and Prevention and Detection of Transactions with Ilegally Obtained Funds	Yes	No
17. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	X	
18. Does the FI have procedures to identify transactions structured to avoid large cash reporting requirements?	X	
19. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/ international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	X	

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? (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.)	X	
21. 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?	X	
22. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	X	

V. Transaction Monitoring	**Yes**	**No**
23. Does the FI have a monitoring program for suspicious or unusual activity that covers fund transfers and monetary instruments (such as travelers checks, money orders, etc.)?	X	

VI. AML Training	**Yes**	**No**
24. Does the FI provide AML training to relevant employees 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 and internal policies to prevent money laundering?	X	
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	X	
26. Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	X	

Name: Víctor Manuel Jiménez García
Title: Officer Compliance
E-mail vjimenez@bancomext.gob.mx
Phone: 5449-92-09
Date: January, 2014

Signature: ____________________