

QUESTIONS	ANSWERS
<b>Legal form and information about the payment institution</b>	
1. Name of the institution:	
2. Does the institution operate under another trade name? If yes, please specify.	
3. Legal form of the institution.	
4. NIP or country of registration, business register (e.g. National Court Register/KRS) and registration number and date.	
5. Start date of payment services activities.	
6. Name of the institution issuing licence for payment services.	
7. Number and date of licence / entry in the register of payment service providers and country of registration or date of notification to the Polish Financial Supervision Authority (KNF).	
8. Scope of the licence/permit.	
9. Are payment services the only activity carried out by your institution? If not, please complete points (a) and (b):	
a. If payment services are not the only activity carried out by your institution, please specify other activities.	
b. If payment services are not the only activity carried out by your institution, please indicate the estimated percentage share of payment services in relation to other	
10. Registered address or place of business of the payment institution. If there is more than one address, please specify all of them.	
11. Is the institution a company whose securities are admitted to trading on a regulated market? If yes, please provide the name of the stock exchange and the ticker symbol (ISIN).	
12. Website of the institution. Please specify all websites, including aliases, platforms or websites connected with other activities of the institution (if any).	
13. Main countries of operation.	
14. Capital structure along with control and ownership chart indicating subsidiaries.	
15. Is the institution a member of a group of companies? If yes, please provide the name of the group and name (and registration documents) of the parent company.	
16. Data of representatives of the institution:	
a. name and surname	
b. PESEL number or date of birth (if the PESEL number has not been assigned) and country of birth.	
17. Data of persons authorized to act on behalf of the institution in interactions with the bank, in particular: persons authorized to initiate transactions:	
a. name and surname	
b. citizenship	
c. PESEL number or date of birth (if the PESEL number has not been assigned) and country of birth	
d. series and number of the identity document.	
18. Data of beneficial owners:	
a. name and surname	
b. in addition: citizenship, PESEL number or date of birth (if the PESEL number has not been assigned), country of birth, series and number of the identity document and	
19. Number of employees of the institution.	
20. What result did the institution achieve in the last financial year?	
a. profit	
b. loss	
c. the current year is the first financial year.	
<b>Nature of the relationship between the institution and the bank</b>	
21. Bank's products/payment services that the institution intends to use.	
21. Bank's products/payment services that the institution uses.	
22. Will the institution use the indicated products/services in relation to payment services provided to customers or for own purposes only?	
22. Does the institution use the indicated products/services in relation to payment services provided to customers or for own purposes only?	
23. Will the institution use the indicated products/services in relation to other activities than payment services?	
23. Does the institution use the indicated products/services in relation to other activities than payment services?	
24. Does the institution conduct or intend to conduct activities with the use of the network of agents/intermediaries that are not directly engaged by the institution?	
25. Customers from which countries will the bank's payments services be offered to?	
25. Customers from which countries the bank's payments services are offered to?	
26. In the case of a foreign payment institution: will the transactions be carried out via the bank for customers of the institution with their registered office or residence address in Poland?	
26. In the case of a foreign payment institution: are the transactions carried out via the bank for customers of the institution with their registered office or residence address in Poland?	
27. Does your institution accept transactions related to the following (sample catalogue below)?	
a. Gambling	
b. Trading in precious metals and stones	
c. Cryptocurrency trading	
d. Arms trading	
e. Drug trading	
f. Trading in intoxicating substances	
g. Trading in pharmaceuticals (unlicensed)	
h. Binary options trading	
i. Entities on the warning lists of financial market regulators and their associates	
j. Entities and persons from countries subject to EU and US sanctions	
k. Such transactions are not accepted.	
<b>Information about AML/CFT Procedure/Policy/Program</b>	
28. Is the institution subject to AML/CFT regulations (applicable to foreign institutions)?	
29. Does the institution have the following documents (if yes, please append them to the questionnaire):	
a. internal AML/CFT procedure?	
b. corporate AML/CFT procedure?	
c. internal regulations on international financial sanctions?	
30. Effective date and date of the last update of the above-mentioned procedures.	
31. Do you have the assessment of the institution's money laundering and terrorist financing risk? If yes, please attach the final risk assessment and the key risk factors.	
32. Please provide the names, surnames and positions of persons responsible for performance of AML/CFT obligations, including their contact details (e.g. email, phone number).	
33. Do you provide relevant training to persons performing AML/CFT obligations? If yes, please indicate how the AML/CFT training program is delivered.	
<b>Business profile of the payment institution</b>	
34. List of actual products and payment services offered by the institution.	
35. List of products and services other than payment services which are subject to AML obligations.	
36. List of available currencies.	
37. Does the institution carry out cash transactions?	
38. Does the institution accept anonymous reloadable instruments such as prepaid cards?	
39. Does the institution execute outgoing/incoming transfers to/from countries outside the European Union or the European Economic Area?	
40. How are relationships with customers generally established (please indicate the estimated percentage share):	
a. in person, at the institution's branch or office	
b. remotely	
c. in another way, e.g. via third parties. If yes, please specify the third parties.	
41. Number of customers with whom the institution has long-standing business relationships (please provide the estimated breakdown into individual AML/CFT risk categories).	

42. Geographical structure of the customer base (please indicate the estimated percentage share):	
a. residents in Poland	
b. residents in the EU	
c. customers from countries outside the EU and the EEA	
43. Does the institution provide services to legal persons?	
44. Legal structure of the customer base (please indicate the estimated percentage share):	
a. natural persons	
b. legal persons	
c. entities without legal personality	
45. Does the institution's customer base include PEPs? If yes, please indicate the number of relationships with PEPs.	
46. Does the institution have a list of industries/entities/countries/regions it does not set up relationships with/ does not provide services to? If yes, please attach the list.	
47. Does your institution provide or intend to provide intermediary services to other financial institutions in the form of nested accounts? If yes, please specify the type of institutions and provide a detailed description of such relationships.	
48. Total number of payment transactions carried out last year.	
49. Total value of payment transactions carried out last year.	
50. Average value of a payment transaction carried out last year.	
51. Does the institution maintain or intend to maintain payment accounts for customers/hold funds for customers? If yes, please complete points (a)-(d):	
a. Total number of payment accounts maintained for customers	
b. Are all funds deposited by customers transferred to/intended to be transferred to a principal bank account?	
c. Does the institution maintain accounts for customers in an RNB (collect) format as part of a bank account with another institution?	
d. Is the institution applying for a bank account which will be used to assign collect accounts to its customers?	
52. Is the institution planning to / Has the institution decided to extend the portfolio of products or payments services and grow the target market over the next 12 months? If yes, please provide details	
53. Does the institution have technical capabilities to use the bank's API (application programming interface) for the purpose of reporting transactions?	
<b>Risk assessment and customer due diligence measures applied by the payment institution</b>	
54. Criteria used to assess the customer's AML/CFT risk.	
55. Frequency of review of customers' data and their AML/CFT risk assessment based on individual risk assessment categories.	
56. Events triggering the review of the customer's risk assessment irrespective of standard reviews.	
57. List of factors increasing the customer's risk assessment.	
58. List of industries and countries classified by the payment institution as high AML/CFT risk.	
59. Procedure for verification of the customer's identification data in the case of relationships set up remotely:	
a. qualified signature	
b. verification transfer	
c. videoverification/ biometrics	
d. scan of identity documents/ registration documents	
e. a selfie with an identity document	
f. external databases (please specify)	
g. other (please specify).	
60. List of documents obtained to verify the customer's identification data in the case of relationships set up in person.	
61. Is the list of documents obtained to verify the customer's identification data regularly updated? If yes, please specify the frequency for individual risk categories.	
62. List of enhanced customer due diligence measures.	
63. Procedure for screening customers and beneficial owners for PEP status:	
a. no screening is performed	
b. written/oral statement of the customer	
c. external databases (please specify)	
d. customer's statement and an external database	
g. other (please specify)	
f. catalogue of customer due diligence measures in relation to PEPs.	
64. Typology of suspicious transactions adopted by the institution. Please attach a description.	
65. System used by the institution to monitor / analyze transactions in terms of AML/CFT:	
a. fully manual	
b. semi-automated/ automated	
c. mixed: depending on the products and payment services (please attach a	
66. Process of monitoring/ analysis of transactions in terms of AML/CFT:	
a. online	
b. ex-post	
c. mixed	
67. Does the transaction monitoring/ analysis system cover:	
a. all customers' transactions	
b. selected transactions, e.g. specific customer group, products or transaction values (if yes, please provide details).	
68. In the case of semi-automated/ automated transaction monitoring/ analysis system, please provide:	
a. number of implemented analytic rules	
b. average monthly volume of analytic alerts generated by the system	
c. average time to resolve/ analyze analytic alerts generated by the system	
d. procedure for verification of alerts: local (at an operational level) or central.	
69. In the case of manual transaction monitoring/ analysis system, please describe how it works (e.g. what kind of reports, statements or criteria are used).	
70. Does the institution have dedicated employees who monitor/analyze transactions? If yes, please provide the number of such employees.	
<b>Information accompanying transfers of funds</b>	
71. Does the institution always identify and verify data about the payer and the payee? If not, please indicate the circumstances in which the data about the payer and the payee are not identified or verified.	
72. Does the institution have a mechanism for detecting whether the data about the payer and the payee are incomplete, including where the institution is an intermediary payment service provider?	
73. Does the institution always ensure access to complete data about the actual/ original payer and the payee in relation to transfers of funds? If yes, please specify how the institution ensures that complete data are provided (e.g. narrative field in a transfer, dedicated information channel, other; please provide details).	
<b>Sanctions lists</b>	
74. Does the institution screen the following individuals and entities against sanctions lists?	
a. customers	
b. beneficial owners of customers	
c. payers	
d. payees.	
75. Sanctions lists used for the purpose of screening (please indicate the category, e.g. OFAC, EU, UN, etc.)	
76. Does screening against sanctions lists cover domestic and foreign payments and banks participating in transactions?	
77. Procedure for screening against sanctions lists:	
a. manual	
b. automated.	
78. Frequency of review of the customer base against sanctions lists.	
79. Are payers and payees screened against sanctions lists before execution of the transaction?	

80. Does the institution's customer base include customers from countries outside the European Economic Area? If yes, indicate the countries.	
81. Has the institution identified confirmed positive matches on sanctions lists?	
<b>Internal control system (ICS)*</b>	
82. Does the institution have a comprehensive ICS that covers the AML/CFT process?	
83. Does the institution have an independent internal audit function?	
84. Was the institution subject to the external audit last year which covered the AML/CFT process, including inspection by regulators? If yes, please complete points (a)-(b):	
a. name of the regulator/ third party which conducted the audit	
b. audited elements of the process.	
85. If the institution uses the services of agents, has a dedicated system been put in place to control agents' compliance with AML/CFT laws and internal regulations in this respect?	
<b>Administrative sanctions</b>	
86. Was any penalty imposed on your institution over the last 5 years for failure to comply with the AML/CFT laws or international sanctions?	
87. Was any of the institution's beneficiary owners or shareholders/ senior executives or agents subject to investigation into money laundering or sanctions, or any penalty or fine, criminal conviction or debt enforcement proceedings issued or instigated by local supervisory or law enforcement authorities over the last 5 years?	

*I hereby declare that the information provided by me is true and complete.*

**DATE:**

**NAME AND SURNAME:**

**POSITION HELD IN THE COMPANY:**

### Additional information about the selected elements of the questionnaire on cooperation with payment service providers

#### Legal form and information about the payment institution

##### 1. Start date of payment services activities.

The licence issue date or the registration date does not have to be the same as the operations start date. Furthermore, a part of the institution could provide this type of services based on earlier licences or before such activity had to be registered (e.g. the national payment institution was formerly licensed to provide services as a small payment institution or a payment service bureau). The longer the track record of payment services, the better the knowledge of customers, their history and customer due diligence measures as well as access to information about the reputation of a given institution.

##### 2. Scope of the licence/ permit.

The scope of the licence/ permit does not have to match the actual catalogue of services. However, it allows the institution to implement new services without the need to apply for an additional licence, which may impact money laundering and terrorist financing risk assessment.

##### 3. Are payment services the only activity carried out by your institution?

Many payment institutions operate as hybrid payment institutions. Other activities may have a significant impact on money laundering and terrorist financing risk, e.g. they may be included in the catalogue of high risk industries.

##### 4. If payment services are not the only activity carried out by your institution, please indicate the estimated percentage share of payment services in relation to other activities.

The question is asked to determine the impact of other activities on the provision of payment services. Accurate figures are not required.

Estimates (e.g. ranges) may be indicated (more than...; less than..., etc.).

##### 5. Main countries of operation.

Some institutions are present in many markets and offer their services to customers in various countries. This determines the nature, type and direction of cash flows, which is important for the analysis of the transaction carried out by the bank.

##### 6. Data of persons authorised to act on behalf of the institution in interactions with the bank, in particular: persons authorised to initiate transactions.

It is not reasonable to obtain data about all attorneys of the institution. The question is asked to collect data of persons authorised to interact with the bank on an ongoing basis, in particular: to place instructions (including in the remote channels).

##### 7. What result did the institution achieve in the last financial year? Please indicate: profit, loss, the current year is the first financial year.

Detailed financial data are not required. Indication of a profit or loss will help the bank to assess business relationships and estimate risk appetite of the institution.

#### Nature of the relationship between the institution and the bank

##### 1. Does your institution accept transactions related to the following (a sample catalogue is provided below).

The bank should define such catalogue taking into account the industries and activities in the case of which direct relationships must not be established according to the internal regulations. This will allow the bank to decide whether such customers may execute transactions, and if so – how they should be executed and analysed.

#### Information about AML/CFT Procedure/Policy/Programme

##### 1. Do you have the assessment of the institution's money laundering and terrorist financing risk? If yes, please attach the final risk assessment and the key risk factors.

The institution's risk assessment is a sensitive document and should not be disclosed to third parties. Therefore each obliged institution should prepare and provide only the information about the key risk factors and the final risk assessment for the purpose of establishing relationships with other entities.

##### 2. Please provide the names, surnames and positions of persons responsible for performance of AML/CFT obligations, including their contact details (e.g. email, phone number).

The question is asked to obtain data of persons referred to in Articles 6–8 of the Act or persons holding equivalent positions in the case of relationships with foreign institutions.

##### 3. Do you provide relevant training to persons performing AML/CFT obligations? If yes, please indicate how the AML/CFT training programme is delivered.

The question is asked to obtain information about delivery of training:

- does the institution have an in-house training programme or use third party services?
- does the training programme reflect the nature and scope of activities of the institution?
- how is the training programme delivered in the case of agents or third parties engaged by the institution?

The quality of training has a significant impact on delivery of all AML/CFT obligations, including the assessment of AML/CFT risk of business relationships with the payment institution.

#### Business profile of the payment institution

##### 1. List of actual products and payment services offered by the institution.

The scope of the licence/ permit does not have to match the actual catalogue of services. The bank should be able to assess the risk attached to actual services provided by the payment institution.

##### 2. List of products and services other than payment services which are subject to AML obligations.

Some institutions operate as hybrid payment institutions and engage in other activities which may also be subject to AML/CFT obligations (e.g. currency exchange or trade in virtual currencies). These activities should be considered when assessing the customer's risk. Many transactions executed by such institutions combine both services (e.g. currency exchange and simultaneous transfer of funds to a third party). When establishing relationships with foreign institutions, the bank should determine if the services that may be potentially used for money laundering and terrorist financing are subject to AML/CFT regime in their home countries.

##### 3. How are relationships with customers generally established (please indicate the estimated percentage share). Number of customers with whom the institution has long-standing business relationships (please provide the estimated breakdown into individual AML/CFT risk categories). Legal structure of the customer base (please indicate the estimated percentage share).

Detailed figures (which may be a trade secret) are not required to assess AML/CFT risk.

Estimates (e.g. ranges) may be used instead (more than...; less than..., etc.).

##### 4. Does the institution provide services to legal persons?

The bank should establish if the institution provides services to legal persons (including in connection with occasional transactions), irrespective of whether or not it has business relationships with legal persons as part of the existing customer base.

##### 5. Does your institution provide or intend to provide intermediary services to other financial institutions in the form of nested accounts?

If yes, please specify the type of institutions and provide a detailed description of such relationships.

Nested accounts are payment accounts which are maintained by the bank for other payment service providers or providers of similar services as part of an account maintained for the payment institution. In this case, the bank carries out transactions not only for customers of the payment institution it cooperates with but also for customers of entities with which the payment institution have established business relationships. It may create a series of interdependencies which may hinder or prevent the bank from meeting its statutory obligations. When establishing such relationships, the bank should assess and document the possibility of delivering the AML/CFT programme, in particular in connection with the analysis of transactions.

##### 6. Total number of payment transactions carried out last year; Total value of payment transactions carried out last year; Average value of a payment transaction carried out last year.

Detailed figures (which may be a trade secret) are not required to assess AML/CFT risk. Estimates (e.g. ranges) may be used instead (more than...; less than..., etc.).

**7. Is the institution planning to/ Has the institution decided to extend the portfolio of products or payments services and grow the target market over the next 12 months? If yes, please provide details.**

Each type of service or product has inherent money laundering and terrorist financing risk. The change of the catalogue of services has a significant impact on money laundering and terrorist financing risk, including the customer's risk assessment and the need to apply relevant customer due diligence measures, particularly in connection with the analysis of transactions.

**Risk assessment and customer due diligence measures applied by the payment institution**

**1. Questions 54–69**

It is not sufficient that the payment institution appends the internal regulations, as the above questions may concern different policies and procedures. It is therefore reasonable to obtain aggregate information that will enable detailed AML/CFT risk assessment.

**2. Does the institution have dedicated employees who monitor/ analyse transactions? If yes, please provide the number of such employees.**

By maintaining an account for the payment institution, the bank carries out transactions for individuals and entities it has no direct relationships with and has limited knowledge of. This hinders the analysis of the transactions. It is therefore important that the bank establishes how such transactions are analysed by the payment institution. Human resources are one of the elements which have a significant impact on the effectiveness of transaction analysis.