

Financial Institution Name: <b>Magyar Export-Import Bank Zrt.</b> (Hungarian name) <b>Hungarian Export-Import Bank Plc.</b> (English name)
Location: <b>Hungary, 1065 Budapest, Nagymező utca 46-48.</b>

## Anti-Money Laundering Questionnaire

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

<b>I. General AML Policies, Practices and Procedures</b>	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y <input checked="" type="checkbox"/>	N o
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?	Y <input checked="" type="checkbox"/>	N o
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y <input checked="" type="checkbox"/>	N o
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?	Y <input checked="" type="checkbox"/>	N o
5. 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>	Y <input checked="" type="checkbox"/>	N o
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?	Y <input checked="" type="checkbox"/>	N o
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y <input checked="" type="checkbox"/>	N o
8. Does the FI have record retention procedures that comply with applicable law?	Y <input checked="" type="checkbox"/>	N o
9. 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?	Y <input checked="" type="checkbox"/>	N o
<b>II. Risk Assessment</b>	Yes	No
10. Does the FI have a risk-based assessment of its customer base and their transactions?	Y <input checked="" type="checkbox"/>	N o
11. 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?	Y <input checked="" type="checkbox"/>	N o
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	Yes	No
12. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y <input checked="" type="checkbox"/>	N o
13. Does the FI have a requirement to collect information regarding its customers' business activities?	Y <input checked="" type="checkbox"/>	N o

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14. Does the FI assess its FI customers' AML policies or practices?	Y <input checked="" type="checkbox"/>	N o
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Y <input checked="" type="checkbox"/>	N o
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y <input checked="" type="checkbox"/>	N o
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y <input checked="" type="checkbox"/>	N o
<b>IV. Reportable Transactions and Preventions and Detections of Transactions with Illegally Obtained Funds</b>	<u>Yes</u>	<u>No</u>
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y <input checked="" type="checkbox"/>	N o
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y <input checked="" type="checkbox"/>	N o
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government / competent authorities?	Y <input checked="" type="checkbox"/>	N o
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?	Y <input checked="" type="checkbox"/>	N o
22. Does the FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	Y <input checked="" type="checkbox"/>	N o
<b>V. Transaction Monitoring</b>	<u>Yes</u>	<u>No</u>
23. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y <input checked="" type="checkbox"/>	N o
<b>VI. AML Training</b>	<u>Yes</u>	<u>No</u>
24. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Y <input checked="" type="checkbox"/>	N o
25. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	Y <input checked="" type="checkbox"/>	N o
26. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Y <input checked="" type="checkbox"/>	N o
27. Does the FI employ third parties to carry out some of the functions of the FI?	Y o	N <input checked="" type="checkbox"/>
28. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> <li>▪ Identification and reporting of transactions that must be reported to government authorities.</li> <li>▪ Examples of different forms of money laundering involving the FI's products and services.</li> <li>▪ Internal policies to prevent money laundering.</li> </ul>	Y o	N o

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Space for additional information

*(Please indicate which question the information is referring to)*

**Refer to point 1:**

CEO's order No. 75/2017. on the Prevention of Money Laundering and Counter-terrorism

**Domestic legal framework:**

- Act LIII of 2017. on the Prevention and Combating of Money Laundering and Terrorist Financing;
- Decree of Ministry of National Economy No. 21/2017. (VIII.3.) on the mandatory elements of the internal rules to be drawn up pursuant to Act LIII of 2017.;
- Recommendation of the Central Bank of Hungary No. 19/2017. (VII.19.) on the detailed rules of implementation of Act LIII of 2017.

<b>Name:</b>	<b>dr. Gábor Hodosi</b>
<b>Title:</b>	<b>chief compliance officer</b>
<b>Signature:</b>	
<b>Date:</b>	<b>17th July 2018</b>