



06th April 2020

Anti Money Laundering/ Anti Terrorist Financing and Know your Customer Questionnaire - Compliance Department

Dear Sir/Madam,

According to the statutory and regulatory requirements applicable to financial institutions in Sri Lanka and other international practices we are publishing below the profile of our Bank for information of the public, any other interested party or our correspondents/ counterparts relating to our AML and KYC policies.

Please forward any inquiries on the below information or request for any additional information required to;

THILANI PUNYAWANSA,
ACTING CHIEF COMPLIANCE OFFICER,
PAN ASIA BANKING CORPORATION PLC,
NO. 450 GALLE ROAD,
COLOMBO – 03
SRI LANKA.

Telephone No : +94 11 4348591
 +94 11 4467777(Ext 6653)
Email : Compliance@pabcbank.com

ANTI MONEY LAUNDERING QUESTIONNAIRE

Confidential

Note : If you answer “NO” to any question, additional information may be supplied at the end of the questionnaire

1.0 General Information

(a) Legal name of Financial Institution (FI)

Pan Asia Banking Corporation PLC

(b) Legal Form & Registered No.

Public Limited Liability Company - Registration No : PQ 48

(c) Head Office Address

No 450, Galle Road, Colombo 03 , Sri Lanka

(d) Registered Office Address

As above

(e) Your Web site

www.pabcbank.com

(f) Name and Address of your Regulatory Body

Central Bank of Sri Lanka, Colombo-01, Sri Lanka

(g) Banking License No.

License issued by Central Bank of Sri Lanka dated 14th June 1995

(h) Web site of Regulatory body

www.cbsl.lk

(i) Do you have a “physical presence?”

Yes

(j) Principal Activities

General Banking

Leasing / Hire Purchase

Pawning (Granting loans repayable within 12 months taking Gold & jewelry as security)

Credit Cards

Margin Trading

2.0 Ownership Structure and Management Information

	Yes	No
(a) Is your Financial Institution publicly owned?	Yes	
(b) Is your Financial Institution listed on any stock exchange if "Yes" State name of stock exchange <i>Colombo Stock Exchange (CSE)</i>	Yes	

(c) List of beneficial owners who control or have power to vote for 20% or more of any class of voting (add further rows if necessary)

Name	Nationality	% of Capital
Nil		

(d) List of Top 10 shareholders as at 31.03.2020

Name	Nationality/Incorporation Details	% of Capital
Mr. K. D. D. Perera	Sri Lankan	29.99
Bansei Securities Co., Ltd.	Foreign Company	15.00
Seylan Bank PLC/Ambeon Holdings PLC(Collateral)	Incorporated in Sri Lanka	9.93
Mr.W.K. H Wegapitiya	Sri Lankan	6.17
Mr. K D H Perera	Sri Lankan	5.27
Mr. D C C Joseph	Sri Lankan	5.19
Mr. P. J. Tay	Foreigner	4.95
Mr. K. D. A. Perera	Sri Lankan	4.34
Imminent Technologies (Pvt) Ltd	Incorporated in Sri Lanka	3.19
Sri Lanka Samurdhi Authority	Incorporated in Sri Lanka	2.51

(e) Names of Directors as at 31.03.2020

Name	Designation	Nationality
Mr. Godewatta Arachchige Rasika Dimuth Prasanna	Chairman	Sri Lankan
Mr. Mr. Sarath Bandara Ranagamuwa	Deputy Chairman	Sri Lankan
Mr.Mohan Asoka Abeynaike	Independent, Senior Non Executive Director	Sri Lankan
Mr. Takashi Igarashi	Independent, Non Executive Director	Japanese
Mr.Toyohiko Murakami	Non Executive Director	Japanese
Mr. Joseph Dacius Nihal Kekulawala	Independent, Non Executive Director	Sri Lankan
Mr. Mahawaduge Yasalal Aravinda Perera	Non Executive Director	Sri Lankan
Mr. Nimal Rohana Tillekeratne	CEO/ Director	Sri Lankan

3.0 Information on Laws / Regulations relating to the Country where you are located

	Yes	No
(a) Is money laundering an offence in the country you are located?	Yes	
(b) Are there regulations and / or laws in place in the country you are located, covering Anti Money Laundering and counter Terrorist Financing?	Yes	
(c) Do the laws and regulations in the country prohibit conducting business with Shell Banks?(Banks without physical presence in any jurisdiction)	Yes	
(d) Do your financial institution provide banking services only to other banks/financial institutions with a “ Physical presence”	Yes	
(e) Do the laws and regulations prohibit the opening / conducting anonymous or numbered accounts? (the name of the account holder is not readily available)	Yes	

4.0 General AML Policies, Practices & Procedures

4.1 Regulatory Information

	Yes	No
(a) Is the Anti Money Laundering compliance policies and procedures approved by the Board of Directors? (If no please state by whom)	Yes	
(b) Does the Financial Institution have a legal and regulatory compliance program that includes a designated Compliance officer who is responsible for co-ordinating and supervising the AML framework?	Yes	
(c) Has the Financial Institution developed written policies approved by the Board of Directors for the processes that you have in place to detect, prevent and report suspicious transactions?	Yes	
(d) Does your financial Institution adhere to the Anti Money Laundering and prevention of terrorist financing requirements developed by the Financial Action Task Force or such similar authority in your country?	Yes	
(e) Has your Financial Institution been reviewed by any government authority for compliance with Anti - Money laundering laws and regulations in the last five years. If “Yes” state the name of the government authority. <i>Central Bank of Sri Lanka</i>	Yes	
(f) Does the Financial Institution have policies covering Politically Exposed Persons (PEPs) their family members and close associate?	Yes	
(g) Does the Financial Institution have a record retention procedure in relation to the applicable law? If Yes please state the period. <i>Six (06) Years</i>	Yes	
(h) Are the Financial Institution’s Anti-Money Laundering policies and practices being applied to all branches and subsidiaries in the home country and in locations outside of that jurisdiction?	Yes	
(i) In addition to inspection by the government supervisor /regulators, does the FI client have an internal audit function or other independent third party that assess AML policies and practices on a regular basis?	Yes	
(j) Does the FI employ third party to carry out some of functions of the Financial Institution	Yes	
(k) If the answer to question in above (j) is yes, does the FI provide AML training to relevant third parties that includes		

(1) Identification and reporting of transactions that must be reported to government authorities	Yes	
(2) examples of different forms of money laundering involve the FI's products and services	Yes	
(3) internal policies to prevent money laundering <i>AML Training not provided for 3rd parties if employed for non-banking functions.</i>	Yes	

4.2 Risk assessment

	Yes	No
(a) Does the Financial Institution have a risk based assessment of the customer base and their transactions?	Yes	
(b) Does the financial institution determine appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the institution has reasons to believe pose a heightened risk of illicit activities at or through the Financial Institution	Yes	

4.3 Know Your Customer / Customer Due Diligence

	Yes	No
(a) Do you conduct customer Due Diligence on your customers before transacting any business with them? <i>(These procedures involve the verification of the legitimacy of a customer and his business through identification and queries.)</i>	Yes	
(b) Does the Financial Institution have a process in place to collect information regarding its customer's business activities / source of income?	Yes	
(c) Does the financial Institution assess its customers that are Financial Institutions of their Anti Money Laundering policies?	Yes	
(d) Does the financial institution have procedures to review and, where appropriate, update customer information relating to High Risk Customers?	Yes	
(e) Does the Financial Institution complete Risk Based assessment to understand the normal and expected range of transactions of its customers?	Yes	

4.4 Reporting of Suspicious Transactions

	Yes	No
(a) Does the Financial Institution have policies and procedures for the identification and reporting of transactions that are required to be reported to the Authorities?	Yes	
(b) Where cash transaction reporting is mandatory does the financial institution have procedures to identify transactions structured to avoid such reporting obligations?	Yes	
(c) Does the financial institution screen customers and transactions against list of persons, entities or countries issued by the government/ regulatory/ competent authorities? <i>(This is deemed high Risk where special attentions is needed to prior to completing such transactions)</i>	Yes	
(d) Does the Financial Institution have policies to reasonably ensure that it only operates with correspond Banks that process valid licenses to operate in their country of origin?	Yes	
(e) Does the Financial Institution have a monitoring program for unusual and potential suspicious activity that cover transfer of funds and monetary instruments such as traveler's cheques, money orders, drafts etc.,	Yes	

4.5 Monitoring Transactions

	Yes	No
(a) Do your procedures requires that transactions conducted by customers be monitored by the relevant account officer/manager/executive banker in order to detect any out pattern activities on the accounts?	Yes	
(b) Has your institution established any software to assist in the above mentioned monitoring of transactions?	Yes	

4.6 Staff Training – Anti Money Laundering

	Yes	No
(a) Does the financial Institution provide AML training to its employees that cover among others the following aspects? (i) Identification and reporting transactions that should be reported to the authorities (ii) Examples of different forms of activities of Money Laundering involving the products and services of the financial institution (iii) The institutions policies to prevent money laundering (Internal Policies & Procedures) (iv) This program conducted on a regular Basis	Yes Yes Yes Yes	
(b) Does the Financial institution retain records of its training programs and records of attendance and the training material used?	Yes	
(c) Does the Financial Institution communicates new Anti Money Laundering related Laws and regulations or changes to those existing to relevant employees?	Yes	

For additional information *(please indicate the question No to which the information relates)*

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On behalf of Pan Asia Banking Corporation PLC, confirm that I am authorized to complete and sign this document and attest that the above information is accurate, complete and correct and contains no false or misleading statements, reflective of our Financial Institution's Anti Money Laundering and Know your Customer policies, procedures and programs.

Name	Thilani Punyawansa
Designation	Act. Chief Compliance Officer
Phone Numbers	094 114 348 591 / 094 114 467 777
Fax	094 112 301 843
E mail	compliance@pabcbank.com
Signature	
Date	06/04/2020

Notes

- For the purpose of this questionnaire, "physical presence" refers to a place of business located at a permanent address in a country in which the bank is authorized and licensed to conduct banking operations and activities. This also encompasses arenas where the bank employs individuals full time and maintains operating records related to banking activities, where the bank is subject to inspection by their respective banking/government authorities that granted the bank its license to operate in the first place.
- Questions that refer to the Financial Institution shall be considered by including all domestic and overseas branches, subsidiaries and affiliates in addition to the Head Office.