# Bank of America Corporation
# AML Questionnaire

| **Financial Institution Name:**<br>**Bank of America Corporation, on behalf of its subsidiaries and affiliates** |
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| **Location:**<br>**Charlotte, North Carolina** |

## Anti-Money Laundering Questionnaire

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

| **I. *General AML Policies, Practices and Procedures:*** | Yes | No |
|---|---|---|
| 1. Is the AML compliance program approved by the FI's board or a senior committee? | Y **X** | 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 **X** | 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 **X** | 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 **X** | N o |
| 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.)* | Y **X** | 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 **X** | N o |
| 7. Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their family and close associates? | Y **X** | N o |
| 8. Does the FI have record retention procedures that comply with applicable law? | Y **X** | 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 **X** | N o |
| **II. *Risk Assessment*** | Yes | No |
| 10. Does the FI have a risk-based assessment of its customer base and their transactions? | Y **X** | 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 **X** | N o |
| **III. *Know Your Customer, Due Diligence and Enhanced Due Diligence*** | 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 **X** | N o |

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| 13. Does the FI have a requirement to collect information regarding its customers' business activities? | Y **X** | N o |
| 14. Does the FI assess its FI customers' AML policies or practices? | Y **X** | N o |
| 15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? | Y **X** | 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 **X** | N o |
| 17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? | Y **X** | N o |
| **IV. *Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds*** | Yes | No |
| 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 **X** | N o |
| 19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations? | Y **X** | N o |
| 20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? | Y **X** | 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 **X** | N o |
| **V. *Transaction Monitoring*** | Yes | No |
| 22. 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 **X** | N o |
| **VI. *AML Training*** | Yes | No |
| 23. Does the FI provide AML training to relevant employees that includes:<br>▪ Identification and reporting of transactions that must be reported to government authorities.<br>▪ Examples of different forms of money laundering involving the FI's products and services.<br>▪ Internal policies to prevent money laundering. | Y **X** | N o |
| 24. Does the FI retain records of its training sessions including attendance records and relevant training materials used? | Y **X** | N o |
| 25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees? | Y **X** | N o |
| 26. Does the FI employ third parties to carry out some of the functions of the FI? | Y **X** | N o |
| 27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes:<br>▪ Identification and reporting of transactions that must be reported to government authorities.<br>▪ Examples of different forms of money laundering involving the FI's products and services.<br>▪ Internal policies to prevent money laundering. | Y **X** | N o |

Space for additional information:
*(Please indicate which question the information is referring to.)*

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| **Name: William J. Fox** |
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| **Title: Managing Director, Global AML and Economic Sanctions Executive** |
| **Signature:** |
| **Date: February 15, 2012** |

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