



**ICICI BANK CANADA**

**Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF)**

**Know Your Customer Questionnaire for Foreign Banks**

Date Approved: March 02, 2009  
Approving Body: SVP and CCO - "Chief Anti-Money Laundering Officer" (CAMLO)  
Date Last Revised: December 6, 2017  
Business Owner: SVP and CCO - "Chief Anti-Money Laundering Officer" (CAMLO)

## 1. General Information

	Particulars	Details
1.1	Legal Name	ICICI Bank Canada (the "Bank")
1.2	Address of registered office	Don Valley Business Park, 150 Ferrand Drive, Suit 1200, Toronto, ON, M3C 3E5
1.3	Mailing address	Same as above
1.4	Country of Incorporation	Canada
1.5	Date of incorporation	November 25, 2003
1.6	Website	<a href="http://www.icicibank.ca">www.icicibank.ca</a>
1.7	Banking License Number	N/A for Banks in Canada
1.8	Tax Identification Number	874033103 – RC001
1.9	Name of Supervisory and Regulatory Authority	The Office of the Superintendent of Financial Institutions Canada (OSFI)
1.10	Legal Form	Schedule II Bank under the <i>Bank Act, Canada</i>
1.11	Type of Business & activity	Full service bank
1.12	Registration Number for Incorporation	N/A for banks in Canada
1.13	SWIFT Id	ICICCATT
1.14	Credit Rating	unrated
1.15	Name of Exchange house where the shares are traded	N/A
1.16	Name and contact details of Chief Anti Money Laundering Officer (CAMLO) of ICICI Bank	Warren Law Don Valley Business Park, 150 Ferrand Drive, Suit 1200 Toronto, ON, M3C 3E5 Telephone: +1 416-601-2782 Fax: +1 416-422-2447 Email: <a href="mailto:warren.law@icicibank.com">warren.law@icicibank.com</a>

## 2. Ownership Structure

#	Name of Major Shareholders ^ (shareholding greater than 5%)	Address of each person	Size of interest
2.1	ICICI Bank Limited	N/A	100%

### 3. AML Questionnaire

<b>I. General AML Policies, Practices and Procedures:</b>	Yes/No
1. Does the Bank have written policies and procedures regarding Know Your Customer (KYC) and AML/ATF matters that are in compliance with applicable local laws and regulations?	Yes
2. Does the AML/ATF compliance program require approval of the Bank's Board or a senior committee thereof?	Yes
3. Does the Bank have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML/ATF program on a day-to-day basis, which has been approved by senior management of the Bank?	Yes
4. Has the Bank 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?	Yes
5. In addition to inspections by the government supervisors/regulators, does the Bank have an internal audit function or other independent third party that assesses AML/ATF policies and practices on a regular basis?	Yes
6. Does the Bank 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.)?	Yes
7. Does the Bank have policies covering relationships with politically exposed persons consistent with industry best practices?	Yes
8. Does the Bank have appropriate record retention procedures pursuant to applicable law?	Yes
9. Does the Bank have identification and verification policies and procedures for all customers?	Yes
10. Does the Bank require that its AML/ATF policies and practices be applied to all branches and subsidiaries of the Bank both in the home country and in locations outside of the home country?	Yes
<b>II. Risk Assessment</b>	
11. Does the Bank have a risk-focused assessment of its customer base and transactions of its customers?	Yes
12. Does the Bank determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the Bank has reason to believe pose a heightened risk of illicit activities at or through the Bank?	Yes
<b>III. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>	
13. Does the Bank have a requirement to collect information regarding its customers' business activities?	Yes
14. Does the Bank collect information and assess AML/ATF policies or practices of the financial institutions it deals with?	Yes
15. Does the Bank have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	Yes

16. Does the Bank take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Yes
<b>IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>	
17. Does the Bank have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes
18. Does the Bank have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes
19. Does the Bank screen transactions for customers or transactions the Bank 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?	Yes
20. Does the Bank have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes
21. Does the Bank adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	Yes
<b>V. Transaction Monitoring</b>	
22. Does the Bank screen its customer account databases against terrorist names?	Yes
23. Does the Bank have a monitoring program for suspicious or unusual activity?	Yes
24. Does the Bank have an internal audit function or other independent third party that assesses AML/ATF policies and practices on a regular basis?	Yes
25. Does the Bank have a dedicated Money Laundering Reporting Officer or similar? (Chief Anti-Money Laundering Officer)	Yes
<b>VI. AML Training</b>	
26. Does the Bank provide AML/ATF training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the Bank's products and services and internal policies to prevent money laundering?	Yes
27. Does the Bank retain records of its training sessions including attendance records and relevant training materials used?	Yes
28. Does the Bank have policies to communicate new AML/ATF related laws or changes to existing AML related policies or practices to relevant employees?	Yes
29. Does the Bank employ agents to carry out some of the functions of the Bank and if so does the Bank provide AML/ATF training to relevant agents that includes identification and reporting of transactions that must be reported to government authorities, examples of different forms of money	Yes

laundering involving the Bank's products and services and internal policies to prevent money laundering?	
<b>VII. Key Regulatory Issues</b>	
30. Has the Bank established and maintain, on an ongoing basis an anti-money laundering/anti-terrorist financing compliance program?	Yes
31. Does the Bank have in place provisions to address risks related to non-face-to-face business (telephone banking, On-line Banking, etc.) relationships and the use of intermediaries and other third party sources of business? (Non-face-to-face business meaning telephone banking, On-line Banking, etc.) (Intermediaries and other third party sources of business meaning lawyers representing a customer, people in trust, other individuals legally appointed by the customers to do business on their behalf)	Yes
32. Does the Bank offer anonymous accounts, i.e. numbered accounts for which the Bank does not have full particulars of the beneficial owner?	No
33. Does the Bank send wire transfers or issue drafts on behalf of non-customers without obtaining proof of identification?	No
34. Does the Bank require complete information for outgoing wire transfer instructions, including sender and beneficiary names, addresses and account numbers?	Yes
35. Does the Bank check the names of current and prospective account holders and monitor all transactions against official lists of suspected terrorists and/or terrorist organizations? Are all confirmed matches reported to competent authorities?	Yes
36. In relation to cross-border correspondent banking and other similar relationships, does the Bank gather sufficient information about a respondent institution to understand their business, reputation, quality of supervision and regulatory history?	Yes
37. Does the Bank offer Payable Through (Clear-Through) Accounts? If, Yes, please provide details of the due diligence requirements the Bank has implemented for these accounts.	No

<b>Iran Sanctions Statement</b>
<p>ICICI Bank Canada confirms that</p> <ul style="list-style-type: none"> <li>• It does not provide correspondent banking services to, for the benefit of, on the direction or order of, an Iranian financial institution; and</li> <li>• To facilitate compliance with applicable Canadian and international sanctions imposed against Iran, it applies enhanced due diligence measures to transactions that evidently emanate from, or are destined to, Iran.</li> </ul>

**Approved by**

Name: **Warren Law**  
 Title: **Senior Vice- President, Compliance, Regulatory & Stakeholder Relations, Ombudsman**  
 Date: **December 6, 2017**