



## PNB ANTI-MONEY LAUNDERING QUESTIONNAIRE

### I. Corporate Information

1. Name of Financial Institution (FI) Completing the Questionnaire	PHILIPPINE NATIONAL BANK
2. Date Established/Incorporated	July 22, 1916 / May 27, 1996
3. Registration Certificate No./License No.	SEC No. ASO96-005555
4. Principal Place of Business	PNB Financial Center, Pres. Diosdado Macapagal Blvd. Pasay City, Philippines 1300
5. Head Office Address	PNB Financial Center, Pres. Diosdado Macapagal Blvd. Pasay City, Philippines 1300
6. Contact numbers	Telephone No: +63 2 85263131 Fax No: +63 2 85263289
7. Website Address	www.pnb.com.ph
8. SWIFT Address	PNBMPHMM
9. Total number of Employees	8,327 as of December 31, 2023
10. Total number of Branches, Subsidiaries and Affiliates	As of 31 December 2023, 631 domestic branches, 72 overseas branches, representative offices, remittance centers, and subsidiaries in 17 locations in the United States, Canada, Europe, the Middle East, and Asia.
11. Type of Banking License	Expanded Commercial Bank (Universal Bank)
9.1. Are there any restrictions associated with the license?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.2. If yes, please indicate.	Not applicable
9.3. Does it allow you to provide services to both domestic and foreign customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### II. Physical Presence

1. Are you an entity with a "Physical presence"?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<p>For the purpose of this questionnaire "physical presence" means a place of business:</p> <ul style="list-style-type: none"> <li>• Located at a fixed address (other than solely an electronic address, a post office address or an accommodation address);</li> <li>• In a country in which the bank is authorized to conduct banking activities;</li> <li>• Where the bank employs 1 or more individuals full-time and maintains operating records related to banking activities; and</li> <li>• Where the banking authority which licensed the bank to conduct banking activities.</li> </ul>
2. Please confirm that you provide banking services on to other banks/financial institutions with a physical presence	We confirm.

III. Ownership Structure					
1. Is the FI?	<input type="checkbox"/> Publicly Owned and Listed <input type="checkbox"/> Government owned <input checked="" type="checkbox"/> Privately owned and Publicly listed <input type="checkbox"/> Privately owned				
2. If the FI is privately owned, please indicate the principal owners with ownership of at least 20% of the capital stock.	<table border="0"> <tr> <th>Name</th> <th>Address</th> </tr> <tr> <td colspan="2">As of 31 December 2023, 59.83% of the outstanding shares of PNB are indirectly owned by LT Group, Inc. (LTGI). Mr. Lucio Tan is the Chairman and CEO of LTGI (indirect ownership through its various holding companies).</td> </tr> </table>	Name	Address	As of 31 December 2023, 59.83% of the outstanding shares of PNB are indirectly owned by LT Group, Inc. (LTGI). Mr. Lucio Tan is the Chairman and CEO of LTGI (indirect ownership through its various holding companies).	
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3. Is the FI publicly traded	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
3.1. If yes, on what Exchange(s)?	Philippine Stock Exchange (PSE)				
4. Is the FI a subsidiary of an entity?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
4.1. If yes, please indicate the name of parent entity.	Not Applicable				
5. Please confirm whether any of the owners/board of directors of the FI is considered as Politically Exposed Person	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
IV. Information Regarding The Country In Which You Are Located And Its Regulations/Regulators					
1. Please indicate the regulator and supervising authority over the operations of banks in your country.	Bangko Sentral ng Pilipinas (BSP), Securities and Exchange Commission (SEC) and Anti-Money Laundering Council (AMLC) of the Philippines				
2. In what geographic regions/countries does the FI do business?	United States of America, United Kingdom, Middle East, China, Guam, Japan, Singapore, Hong Kong, and Canada				
3. Has your Country established laws designated to combat Money Laundering and Financing of Terrorism according to international standards and controls?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
4. Is your country a member of the FATF?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
4.1. If your country is not a member of the FATF, please provide the name of the comparable organization to which your country belongs.	Philippines is a member of Asia Pacific Group on Money Laundering (APG)				
5. Does your country observe the 40 anti-money laundering recommendations by the Financial Action Task Force (FATF)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
V. General AML Policies and Procedures					
1. Does the FI have policies and procedures for the prevention of money laundering and terrorist financing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
1.1 If yes, please indicate the date of last update and approval of the Board	The Bank's Money Laundering and Terrorism Financing Prevention Program (MTPP) was updated and approved on June 2024.				
1.2 Does this policy apply to all your national and international branches and subsidiaries?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				

<p>If requested, are you prepared to provide PNB with a copy of your AML Policies and procedure</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Details of officer responsible for the oversight of the Bank's AML policies and procedure</p>	<p>Name : Atty. Isagani A. Cortes          Position : Executive Vice President &amp; Chief Compliance Officer (CCO)          E-mail Address : cortesia@pnb.com.ph          Telephone No. : +63 2 85734051</p>
<p>3. Does the FI have policies and procedures covering relationships with Politically Exposed Persons (PEP's) consistent with relevant regulatory requirements and industry best practices?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>VI. Know Your Customer, Due Diligence and Enhanced Due Diligence</b></p>	
<p>1. Does the FI verify the identity of all customers prior to opening of accounts?</p> <p>1.1. What are the required documents and major steps to verify a new customer's identity?</p> <p>1.2. Is an ID required for every account opened / every transaction?</p> <p>If yes, what are the forms of acceptable IDs?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Verification of procedures for individual customers shall include but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Confirming the date of birth from a duly authenticated official document</li> <li>• Verifying the address through evaluation of utility bills, bank credit card statement, or other documents showing permanent address or through on-site visitation</li> <li>• Contacting the customer by phone, email or letter (such as sending of "thank you letters"); and</li> <li>• Determining the authenticity of the identification documents through validation of its issuance by requesting a certification from the issuing authority or by any other effective and reliable means.</li> <li>• Determining the veracity of the declared source of funds.</li> </ul> <p>Validation procedures for corporate or juridical entities shall include but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Require the submission of audited financial statements conducted by a reputable accounting/auditing firm;</li> <li>• Inquiring from the supervising authority the status of the entity</li> <li>• Obtaining bank references;</li> <li>• Verifying the address through on-site visitation of the company, sending thank you letters, or other documents showing address;</li> <li>• Contacting the entity by phone or email.</li> </ul> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Acceptable forms of IDs are valid photo-bearing IDs with signature issued by an official authority. (e.g. Passport, Driver's License, National ID etc.).</p>
<p>2. How frequently does the FI update its customer's Due Diligence/KYC information?</p>	<p>The Bank's business and support units must ensure that information and documents collected under the customer due diligence (CDD) are updated based on the assigned risk rating.</p>

3. Does the FI allow non-face-to-face contact with customers establishing business relationship?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No new account shall be opened without face-to-face contact with the customer.
4. Does the FI open fictitious accounts?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Does the FI have a policy prohibiting accounts/relationships with shell banks	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. For inward remittances, does the bank check the declared bank account name and bank account number against its own records before crediting a bank account? If so, is this a manual or system-driven process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The Bank remittance products are supported by Integrated Remittance System (IRS), Agent Remittance System (ARS) and Global Remittance System (GRS).
7. Does the FI conduct watch list screening of its customers against sanctions lists?  7.1 If yes, please check which lists are used for screening.        7.2 Are all transactions of clients screened against indicated lists?    7.3 What are the FI's policies and procedures upon noting a positive match when conducting watch list screening?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> OFAC <input type="checkbox"/> Australian DFAT <input checked="" type="checkbox"/> European Union <input checked="" type="checkbox"/> HKMA <input checked="" type="checkbox"/> United Nations <input checked="" type="checkbox"/> NZRBA <input checked="" type="checkbox"/> Bank of England <input type="checkbox"/> Others, Please specify: <u>OFAC/FATF Sanctioned Country List, Japan Anti-Social Forces List, Consolidated Sanctions List maintained by OFAC, AMLC List and the Banks Internal Watchlist.</u>  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  In the event of "name match", the printed result with date and time shall be referred to Branch Head or Division/Group Head for guidance and subject to EDD. If upon further verification of the Branch Head or Division Head confirmed positive match, the on-boarding or the transaction should not proceed.
<b>VII. Risk Assessment</b>	
1. Does the FI have a risk assessment of its customer base and transactions of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>VIII. Correspondent Banking</b>	
1. Does the FI verify the identity of any third-party entities that will use the correspondent banking services?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<p>2. Do any of the FI's correspondent banks originate from the non-cooperative countries and territories as identified by the FATF?</p> <p>2.1. If yes to question 40, has the FI formulated any procedure in respect to the on-going monitoring of activities conducted through such correspondent accounts?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p>
<p>3. Does the FI provide nested account or upstream/downstream correspondent clearing services to other financial institutions?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p><b>IX. Transaction Monitoring</b></p>	
<p>1. Does the FI have a monitoring program for unusual and potentially suspicious activity?</p> <p>1.1. If yes, please select your AML transaction monitoring process (if automated, kindly indicate name of system used)</p> <p>1.2. Who is responsible for transaction monitoring?</p> <p>1.3. What is the regularity of review?</p> <p>1.4. Please describe the review process and internal escalation procedures upon noting unusual transaction?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Automated <input type="checkbox"/> Manual</p> <p>SAS AML Transaction Monitoring</p> <p>The Financial Crime Risk Investigation Department of the Global Compliance Group is primary responsible in the monitoring of alerts surfaced by the Bank's AML electronic monitoring system.</p> <p>There are profiles/alerts that will capture transaction reviews of all customers on a daily and monthly basis. The Bank has also specific profiles focusing on high risk customers based on AML trends and threats.</p> <p>Unusual transactions are identified based on red flags or unusual circumstances in a transaction. Transactions with no legal trade, purpose of economic justification, or the transactions perceived to be structured to avoid the regulatory/mandatory reporting requirements among others, are evaluated if these warrant STR filing.</p>
<p><b>X. Suspicious Transaction Reporting</b></p>	
<p>1. Does the FI have a suspicious transactions reporting procedure?</p> <p>1.1. Who is responsible for reporting suspicious transactions report and to whom it is reported?</p> <p>1.2. Is there a form for reporting?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>The Financial Crime Risk Review Committee (FCRRC) is primarily tasked to evaluate and approve the filing of STR to the Anti-Money Laundering Council (AMLC). Reporting of Suspicious Transaction shall in all cases be the responsibility of the branch/office maintaining the account.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

1.3. Is there a reporting deadline to the Authorities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>XI. Government Reporting</b>	
1. Does the FI comply with any AML/regulatory limits set by the regulatory Authority?  1.2. If Yes, what are these limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  For the Philippines, Covered Transaction Report (CTR) is a transaction in cash or other equivalent monetary instrument involving a total amount in excess of P500,000 (in peso equivalent) in one (1) banking day and Suspicious Transaction Report (STR) regardless of the amount are filed to the Anti-Money Laundering Council (AMLC) within one (1) banking day.
<b>XII. Government Request</b>	
1. What is the FI's procedure for handling government requests for information?	The Global Compliance Group and Legal Group accept and provide requested information for qualified government agencies.
<b>XIII. Record Keeping</b>	
1. What is the FI's Record-keeping Requirement?	The Bank abides to all record-keeping requirement set by the regulator.
2. What are the records which are kept about the customer and their transactions?	Account opening forms, customer information/documents, signature card, IDs and transaction records.
3. What is the record retention period?	Record retention is five (5) years; however, if the account is subject of a money laundering case, the records / documents are kept until the case has been finally resolved by the courts.
<b>XIV. AML Training</b>	
1. Does the FI provide AML 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 FI's products and services and internal policies to prevent money laundering?  1.1. If yes, please indicate frequency.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  All new hires must undergo compliance and AML awareness training within six months from date of employment while existing employees are required to participate in refresher courses every 12 months.
2. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3. Does the FI have policies or practices to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



**XV. Independent Audit Testing**

1. Does your FI have an internal audit function or other independent third party, other than government supervisors/regulators, that assesses AML/CTF policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2. When did the most recent AML/CFT regulatory examination take place?	The last regulatory examination took place in November 2023.
3. Has the FI been the subject of any investigation, indictment or conviction related to an AML violation/financing of terrorism in the past five years?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**XVI. FATCA Compliance**

1. Please provide your GIIN no. if applicable	GIIN no. I9UIFP.00000.LE.608
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**XVII. Certification**

 Signature	
I confirm that I am authorized to complete this document and that I certify that the information is current, accurate and complete.	
Name:	Atty. Isagani A. Cortes
Position:	Executive Vice President & Chief Compliance Officer
Address:	PNB Financial Center, President Diosdado Macapagal Blvd., Pasay City Philippines, 1300
Contact Number:	+632 8573-4051
Email Address:	cortesia@pnb.com.ph
Date:	October 2, 2024

