

# Standard Life Investments Global SICAV Due Diligence Questionnaire



Financial Institution (FI) Name:

Parent Company name and country (if applicable):

Address:

Regulator:

Registration Number:

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

1. Is your AML compliance program approved by your board or a senior committee? Yes  No
2. Do you have a designated officer, such as an MLRO, who is responsible for coordinating and overseeing the AML framework? Yes  No
3. Have you developed written policies documenting the processes that you have in place to prevent, detect and report suspicious transactions? Yes  No
4. In addition to inspections by the government supervisors/regulators, do you have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? Yes  No
5. Do you 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  No
6. Do you have policies to reasonably ensure that you will not conduct transactions with or on behalf of shell banks through any of your accounts or products? Yes  No
7. Do you have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates? Yes  No
8. Do you have record retention procedures that comply with applicable law? Yes  No
9. Are your AML policies and practices being applied to all branches and subsidiaries both in your home country and in locations outside of that jurisdiction? Yes  No

## II. Risk Assessment

10. Do you have a risk-based assessment of your customer base and their transactions? Yes  No
11. Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that you have reason to believe pose a heightened risk of illicit activities at or through your firm? Yes  No

## III. Know Your Customer, Due Diligence and Enhanced Due Diligence

12. Have you implemented processes for the identification of all customers on whose behalf you maintain or operate accounts or conduct transactions? Yes  No
13. Do you have a requirement to collect information regarding your customers' business activities? Yes  No
14. Do you assess your customers' AML policies or practices? Yes  No
15. Do you have a process to review and, where appropriate, update customer information relating to high risk clients? Yes  No
16. Do you have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? Yes  No
17. Do you complete a risk-based assessment to understand the normal and expected transaction of your customers? Yes  No

#### IV. Prevention and Detection of Transactions with Illegally Obtained Funds

18. Do you screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? Yes  No
19. Do you have policies to reasonably ensure that you only operate with correspondent banks that possess licenses to operate in the countries of origin? Yes  No

#### V. Transaction Monitoring

20. Do you have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers cheques, money orders, etc? Yes  No

#### VI. AML Training

21. Do you provide ongoing AML training to relevant employees? Yes  No

#### Additional information

Please indicate which question the information is referring to

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Signature:

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Completed by:

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MLRO/Authorised Signatory/Director:

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Date:

Standard Life Investments Global SICAV is an umbrella type investment company with variable capital registered in Luxembourg (no. B 78.797) at 2-4, rue Eugène Ruppert, L-2453 Luxembourg, Grand Duchy of Luxembourg.

Standard Life Investments Global SICAV II is an umbrella type investment company with variable capital registered in Luxembourg (no. B 204.798) at 2-4, rue Eugène Ruppert, L-2453 Luxembourg, Grand Duchy of Luxembourg.

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