

AFRICA FINANCE CORPORATION

**ANTI – MONEYLAUNDERING AND COMBATING FINANCING OF
TERRORISM POLICY (“AML/CFT POLICY”)**

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Name
All AFC Employees

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1. AFC ANTI-MONEY LAUNDERING AND COMBATING FINANCING OF TERRORISM POLICY

1.1 INTRODUCTION

Africa Finance Corporation (AFC) is an international financial institution that is committed to the highest standards of anti-money laundering (AML) compliance. Consequently it is the policy of the AFC that management and employees adhere to these standards to prevent the use of the Corporation's products and services for money laundering purposes.

In the global marketplace, the attempts to use financial institutions to launder money constitute a significant problem that has caused great concern to governments and regulators and has resulted in the passage of stricter laws and increased penalties for money laundering in many countries. It has also spurred the formation of the Financial Action Task Force on Money Laundering, an inter-governmental body consisting of 34 member jurisdictions and 2 regional organizations, representing most major financial centres in all parts of the globe. The Financial Action Task Force (FATF) is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. The objectives of the FATF are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. The FATF is therefore a "policy-making body" which works to generate the necessary political will to bring about national legislative and regulatory reforms in these areas.

Terrorism financing also came into greater focus after the events of terrorism on 11 September 2001 in the United States. The US passed the USA PATRIOT Act to, among other reasons, attempt thwarting the financing of terrorism (CFT) and anti-money laundering (AML) making sure these were given some sort of adequate focus by US financial institutions. The act also had extraterritorial impact and non-US banks having correspondent banking accounts or doing business with US banks had to upgrade their AML/CFT processes. Globally, financial institutions are increasingly being held responsible for ensuring that their institutions are not used as vehicles to finance terrorism. Consequently, in line with AFC's objective to adhere to best practice, this AML/KYC Policy describes the processes and procedures to be followed by the employees of the AFC to ensure that the AFC is not used as a vehicle to launder money of finance terrorism.

Given the markets that the AFC operates and the importance of compliance with AML/CFT requirements, AFC will examine its Anti- Money Laundering/CFT strategies, goals and objectives annually or on a more frequent basis if required, in order to ensure that we maintain an effective AML/CFT compliance framework for the Corporation's business that reflects the best practices for an international financial institution.

Compliance with AFC's AML/CFT requirements is the responsibility of all employees. The framework is formulated and the implementation shall be directed by a senior officer, or where applicable, senior officers of the Corporation, designated to manage the AFC's AML policy. Broadly speaking, the AFC's AML Policy will at a

minimum continue to incorporate important requirements of an effective compliance system, which include client screening and monitoring requirements, "know your customer" policies (including the requirement to establish the identity of beneficial owners), embargo policies, record keeping requirements, the reporting of suspicious business activities and transactions in accordance with relevant laws and regulations, and training.

This Policy establishes governing principles and standards to protect AFC and its businesses from being used to launder money and finance terrorism. All AFC employees, wherever located, must be vigilant in the fight against money laundering and terrorism and must not allow AFC to be used for money laundering activities. It is the policy of the AFC that the Corporation, its officers and employees, should not knowingly violate or assist in the violation of all applicable laws. Violation of applicable laws may expose the AFC to significant reputational risks and potential litigations, not suited for an international financial institution.

1.2 SCOPE

This Policy is applicable to AFC, its subsidiaries and branches. The standards set out in this Policy are minimum requirements based on applicable global legal and regulatory requirements and apply to the entire Corporation. The requirements set forth in this Policy are intended to protect AFC, its employees and clients from being used for money laundering purposes, terrorist financing or other financial crime. This Policy also establishes the broad framework for the prevention and detection of acts of money laundering and possible terrorist financing.

1.3 POLICY

AFC businesses and employees must:

- a) Protect AFC from being used for money laundering;
- b) Adhere to the Know Your Customer (KYC) policies and procedures of the Corporation;
- c) Take immediate action, once a suspicious activity is detected, and make reports to the AFC's Compliance Officer;
- d) Comply with applicable money laundering laws as incorporated into this Policy.

This Policy has been prepared having regard to the universal principles contained in various global laws and standards governing money laundering and combating financing of terrorism. The procedures contained herein will be continually benchmarked against best practices across major global jurisdictions to ensure that new developments and evolutions in regulation and legislation are reflected in the policy as soon as practicable.

1.4 WHAT IS MONEY LAUNDERING?

Money laundering is involvement in any transaction or series of transactions that seeks to conceal or disguise the nature or source of funds or proceeds derived from illegal

or criminal activities, including drug trafficking, terrorism, organized crime, fraud, bribery, corruption etc.

Generally, the money laundering process involves three stages:

- **Placement** - Physically disposing of cash derived from illegal activity. One way to accomplish this is by placing criminal proceeds into traditional financial institutions or non-traditional financial institutions such as currency exchanges, casinos, or check-cashing services.
- **Layering** - Separating the proceeds of criminal activity from their source through the use of layers of financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds, and provide anonymity. Some examples of services that may be used during this phase are the early surrender of an annuity without regard to penalties, fraudulent letter of credit transactions, and the illicit use of bearer shares to create layers of anonymity for the ultimate beneficial owner of the assets.
- **Integration** - Placing the laundered proceeds back into the economy in such a way that they re-enter the financial system as apparently legitimate funds.

The degree of sophistication and complexity in a money laundering scheme is virtually infinite and is limited only by the creative imagination and expertise of criminals. A financial institution may be used at any point in the money laundering process. AFC's businesses must be protected from being used by criminals engaged in placement, layering, or integration of illegally derived proceeds.

1.5 THE IMPORTANCE OF THIS POLICY TO THE INDIVIDUAL EMPLOYEE AND TO AFC

In adhering to this Policy, AFC expects that its employees will conduct themselves in accordance with the highest ethical standards.

AFC also expects its employees to conduct business in accordance with applicable local and global laws governing money laundering and finance of terrorism. AFC employees shall not knowingly provide advice or other assistance to individuals who attempt to violate or avoid money laundering laws, combating financing of terrorism laws or the requirements of this Policy.

Money laundering laws apply not only to criminals who try to launder their ill-gotten gains, but also to financial institutions and their employees who participate in those transactions, if the employees know that the property is criminally derived. "Knowledge" includes the concepts of "willful blindness" and "conscious avoidance of knowledge." Thus, employees of AFC, whose suspicions are aroused, but who then deliberately fail to make further inquiries, wishing to remain ignorant, may be considered under the law to have the requisite "knowledge."

AFC employees who suspect money laundering activities should refer the matter to their immediate supervisors and the Compliance Officer.

Failure to adhere to this Policy will subject the AFC's employees to disciplinary action up to and including termination of employment. Violations of money laundering and

CFT laws also may subject AFC employees to higher legal consequences such as imprisonment and, may subject the AFC, to fines, forfeiture of assets, and other serious punishment.

2. STANDARDS

This Policy establishes the minimum standards to which AFC businesses must adhere. In situations where the requirements of applicable local money laundering or CFT laws establish a higher standard, AFC will adhere to the stricter law. If any applicable local laws appear to conflict with the standards of this Policy, the particular AFC business or employee must consult with the AFC's Compliance Officer(s).

Key Elements of the AFC's AML Compliance Policy and Implementation Framework

2.1 Each AFC business unit and employee shall be covered by the AFC's AML/CFT policy. This policy describes procedures and internal controls to effect compliance with applicable laws and to implement the standards set forth in this Policy.

The AFC's Anti-money laundering framework includes:

- a) A written anti-money laundering policy that sets forth the Corporation's KYC procedures as well as the other basic elements of its anti-money laundering program;
- b) The designation of Anti-Money Laundering Compliance Officer(s) or other appropriate personnel responsible for coordinating and monitoring day-to-day compliance with this Policy;
- c) Recordkeeping and reporting practices in accordance with applicable law;
- d) Appropriate methods of monitoring so that suspicious customer activity can be detected and appropriate action can be taken;
- e) Reporting of suspicious activity to the relevant government authorities in accordance with the applicable law in relevant legal jurisdiction;
- f) Annual anti- money laundering/CFT training for all employees.
- g) A prohibition on engaging in business with shell banks.
- h) AFC shall not engage financial institutions that are relevant to the presentation of the transaction under consideration.
- i)

2.1.1 In developing the AFC's AML/CFT framework, AFC shall assess the money laundering risks that the Corporation faces, taking into cognizance the following factors:

- a) The different categories of customers, including whether the AFC customers conduct financial transactions for their own customers (Examples of such customers include banks, brokers or dealers in securities, mutual funds, investment managers, money transmitters, currency exchanges, foreign exchange businesses, check cashers, issuers and sellers of money orders and traveler's checks, attorney escrow accounts, and hotels with casinos.);
- b) The nature of the AFC products and services that are provided;
- c) The customers' expected use of the AFC products and services; and
- d) The localities of the AFC businesses and their customers.

2.1.1.1 One category of customers, namely, "public figures or politically exposed persons and related individuals," can pose unique reputational and other risks.

2.1.1.2 For purposes of this Policy, a "public figure" or "politically exposed person" is any individual who occupies, has recently occupied, is actively seeking, or is being considered for, a senior position in a government (or political party) of a country, state, or municipality or any department (including the military), agency, or instrumentality (e.g., a government-owned corporation) thereof.

2.1.1.3 For purposes of this Policy, a "related individual" is any person who is a member of the immediate family of a public figure, e.g., a spouse, parent, sibling, or child; or a senior advisor closely associated with a public figure.

2.1.1.4 In developing and implementing this AML framework, the AFC will continue to assess any reputational or other risks posed to our business through association with public figures and related individuals.

2.1.1.5 Commensurate with the assessment of those risks, the AFC under this policy will have stringent procedures for commencing or continuing to maintain a relationship with an individual who is known through reasonable measures to be a public figure or related individual (including a customer who was not a public figure or a related individual when a relationship was established and who subsequently became a public figure or related individual) and for a legal entity which is known through reasonable measures to be substantially owned or controlled by a public figure or related individual.

Such procedures shall provide for:

- a) Referral of any questions as to whether an individual is a public figure or a related individual to the AFC's Compliance Officer;
- b) Inquiry as to the reputation of the public figure or related individual which should include:

- i. Consultation, where applicable, with the senior business managers of the Corporation in the home country of the public figure or related individual;
 - ii. Consultation with the AFC's Compliance Officer
- c) Review of generally available public information regarding the public figure or related individual, such as news articles from reputable sources such as WorldCheck;
 - d) Documentation of any significant information obtained as a result of such inquiry and the records must be retained in line with the record retention provisions of this policy;
 - e) Approval to commence a new business relationship with a public figure or related individual or approval to continue to maintain such existing business relationship can only be granted by the President/CEO of the AFC, upon recommendation in writing from the AFC's Compliance Officer(s) ;
 - f) Appropriate methods of monitoring on an ongoing and regular basis the business relationship with any public figure or related individual.

2.1.2 The AFC's anti- money laundering framework will continually seek to provide policies, procedures, and internal controls that establish reasonable measures to be taken by AFC to minimize the risk that it will be used for illicit activities, taking into cognizance the products and services that we provide and the types of customers we serve as well as the applicable legal requirements.

2.1.3 In addition, AFC would apply enhanced due diligence and increased scrutiny to transactions (and counterparties) in jurisdictions classified by FATF as

(a) Jurisdictions with strategic AML/CFT deficiencies that have not made sufficient progress in addressing the deficiencies or have not committed to an action plan developed with the FATF to address the deficiencies.

(b) Jurisdictions with strategic AML/CFT deficiencies and to which counter-measures apply.

Know Your Customer

2.2 It is the policy of AFC to have Know Your Customer (KYC) policies, procedures, and internal controls reasonably designed to:

- a) Determine and document the true identity of customers who establish business relationships, open accounts, or conduct significant transactions and obtain basic background information on these customers before the relationship is established;
- b) Obtain and document any additional customer information, commensurate with the assessment of the money laundering risks posed by the customers' expected use of products and services;

- c) Ensure that where the AML risk is high, an enhanced due diligence and KYC procedure is carried out by the business seeking to establish the business relationship with the prospective client or counterparty prior to the commencement of the relationship;
- d) Ensure that the completion of the AFC's requisite basic KYC or enhanced due diligence requirements by the businesses and the certification of the satisfactory KYC compliance by the AFC Compliance Officer(s) is a necessary condition for the commencement of any business relationship, consummation of a financing or disbursements under an approved financing or investment; and
- e) Protect AFC businesses from the risks of doing business with any individuals or entities whose identities cannot be determined, who refuse to provide required information, or who have provided information that contains significant inconsistencies that cannot be resolved after further investigation.
- f) Currently AFC does make transfers or wire payments but only to non AFC or third party accounts. However, these payments are for investment purposes and the client would already have been subjected to AFC's rigorous due diligence and KYC procedures. Such wire transfers are subject to the control platform normal to these kinds of payments.

Customer Identification

2.2.1 It is the AFC's policy to obtain sufficient and reliable information to determine the identity of all individual customers. This may include the proofs of identity issued by a government and proofs of residences of Directors, Officers, Managerial personnel and other persons that have a significant beneficial interest in the customer.

2.2.2 It is also the AFC's policy to obtain sufficient reliable identifying information to determine the identity of all customers. This may include a review of the customer 's legal documents and relevant documents that identify the persons that have significant beneficial interests in the corporation, bank, financial institution, family owned or owner-manager business.

2.2.3 AFC's Policy prohibits the opening of anonymous accounts or special name account (i.e. an account using a pseudonym or number rather than the actual name of the customer).

2.2.4 The authority of any person authorizing financial transactions on behalf of the customer shall be established by documentation, including but not limited to a Board Resolution reference to local law, or other reliable means. AFC businesses responsible for the relationship must determine that person's identity and relationship to the customer.

2.2.5 Reasonable measures shall be taken to obtain information about the true identity of the person on whose behalf a business relationship is established or an account is opened or a significant transaction conducted (i.e., beneficial owners), if there are any doubts as to whether the customer is acting on its own behalf.

Other Customer Information

2.2.6 It is AFC's policy to determine and document at the time of establishing a relationship, the assessment of the money laundering risks posed by the customer's expected use of the AFC's products and services. This assessment should document:

- a) The customer's source of funds;
- b) The customer's source of income and assets; and
- c) The nature and extent of the customer's expected use of the Corporation's products and services (i.e. a transaction profile) or the customer's investment objectives.
- d) The customer is not on an UN and EU sanctions list, or any national sanction list deemed appropriate by AFC management.

2.2.7 The information about a customer obtained at the time of the establishment of the relationship constitutes a "customer profile." AFC shall periodically update customer profiles and confirm information provided by customers, taking into cognizance the assessment of the money laundering risks posed by that customer.

Information Requirements for Customers with Relationships with an AFC Partner Institution

2.2.8 Generally, the AFC shall seek as far as practicable to conduct its AML/KYC checks by itself. However, AFC in very limited circumstances may rely upon another AFC partner institution for the identification of a customer who has a relationship with that institution and seeks to establish a relationship with AFC. This may apply in situations where AFC is co-investing in a project with other reputable lenders who have already carried out satisfactory AML/KYC compliance checks on the borrower or Project Company. At a minimum, to rely upon an AFC partner institution for the identification of a customer, AFC must:

- a) Document that the AFC partner institution has a relationship with the customer;
- b) Determine that the partner institution's identification requirements and KYC procedures reasonably meet the requirements of the AFC's Know Your Customer policies and procedures; and
- c) Be able to obtain upon request from the AFC partner institution, the information and documentation that was obtained and relied upon to determine the true identity of the customer.

Notwithstanding the acceptability to the AFC of the KYC assessment documents provided by a Co-Arranger or Partner Financial Institutions, AFC remains responsible for carrying out an independent KYC and AML checks on all prospective clients before such relationship is established.

For the avoidance of doubt, AFC's partner institution refers to a financial institution that the AFC is co-investing with, consultants, lawyers, advisers and other firms that by virtue of their relationship with the client have carried out an AML/KYC check on the customer.

2.2.9 When AFC relies upon a partner institution for the identification of a customer, AFC may obtain any additional customer information required at the establishment of a relationship, commensurate with the assessment of the money laundering risks, in accordance with Section 2.2.6.

Anti-Money Laundering Compliance Officers

2.3 AFC's designated compliance officers shall be responsible for coordinating and monitoring day-to-day compliance with applicable money laundering laws and this Policy. The AFC's designated Compliance Officers shall be the Chief Risk Officer (for every aspect of this policy except the aspects covering the application and interpretation of relevant laws and regulations) and the General Counsel (for all aspects of this policy covering the application and interpretation of relevant laws and regulations). The designated officers shall be AFC Executives or senior management staff with direct reporting line to the President/CEO.

Recordkeeping and Reporting Requirements

2.4 It is the policy of the AFC to comply with applicable recordkeeping and reporting requirements established by any relevant law that may apply. In the absence of a relevant law, it is the Policy of the AFC to retain client's KYC records for at least five years. Where a relevant law provides for a longer retention period, the stricter law shall apply. Records may be stored and retained in hard copies or electronically, with adequate back-up of the information in a secured, offsite location in line with the Corporation's disaster recovery policy.

AFC shall maintain the following documents for at least five (5) years unless an applicable local law on document retention specifies a longer period:

- a) Customer profiles;
- b) Reports made to government authorities concerning suspicious customer activity relating to possible money laundering or other criminal conduct together with supporting documentation;
- c) Records of all formal anti-money laundering training conducted which include the names and business units of attendees and dates and locations of the training; and
- d) Any other documents required to be retained under applicable money laundering laws.

Monitoring for Suspicious Activity

2.5 It is the policy of the AFC to monitor and detect, throughout a customer relationship, suspicious customer activity so that appropriate actions can be taken, and reports can be made to relevant government authorities in accordance with applicable laws.

2.5.1 In developing appropriate methods of monitoring, AFC shall consider:

- a) Whether monitoring should be done on an individual account basis or at a product activity level using generic parameters; and
- b) Whether computerized or manual monitoring is suitable and practical, taking into account the size and nature of its operations and available technology.

Reporting Suspicious Activities Involving Possible Money Laundering

2.6 AFC businesses and employees must satisfy any legal obligation to report suspicious activities involving possible money laundering.

2.6.1 Given the differences in local laws regarding the reporting of suspicious activity and in some cases the absence of such laws, this Policy hereby establishes a uniform standard by which AFC businesses and employees, wherever located, are to determine whether an activity is suspicious for purposes of internal referrals to the Compliance Officer(s). Under the AFC standard, suspicious activity involving possible money laundering is any transaction conducted or attempted by, at, or through an AFC business involving or aggregating US\$10,000 or more in funds or other assets or its local currency equivalent that the AFC business knows, suspects, or has reason to suspect:

- a) Involves funds derived from illegal activities or is intended or conducted in order to hide or disguise funds or assets derived from illegal activities (including, without limitation, the ownership, nature, source, location, or control of such funds or assets) as part of a plan to violate or evade any law or regulation or to avoid any money laundering regulation;
- b) Is designed to evade a money laundering regulation, for example, a cash reporting regulation; or
- c) Has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage and the AFC business knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.
- d) AFC shall regularly update the documentation concerning quarterly risk monitoring and the annual review of portfolio names.

2.6.1.1 The above-referenced US\$10,000 threshold is for purposes of internal referrals and does not establish a threshold for transaction monitoring.

2.6.2 AFC shall promptly examine any customer activity that is questionable to determine and document the reason for the activity and whether the activity is suspicious under the AFC standard set forth in Section 2.6.1 of this Policy as well as under any standard established by applicable local law.

2.6.3 AFC businesses and employees shall promptly refer any customer activity that is determined to be suspicious under the AFC standard set forth in Section 2.6.1 of this Policy or under any standard established by applicable local laws to the designated Compliance Officer(s) so that appropriate actions can be taken, including the timely filing of suspicious activity reports in accordance with applicable local laws.

Terminating Customer Relationships

2.6.4 AFC businesses shall take some appropriate actions before a customer relationship is terminated because of suspicious activity and before the customers are notified of the decision to terminate. The procedures relating to pre-termination and pre-customer notification action to be taken shall be reasonably designed to provide for:

- the prompt referral of the matter to the designated AFC Compliance Officers(s), and;
- communication of the decision to terminate and the anticipated date for notifying the customer of that decision should be documented in a suspicious activity report (SAR) to be filed or as a supplement to any SARs that have previously been filed with AFC's Compliance Officer (s)

Prohibition Against Disclosing Suspicious Activity Reports

2.6.5 Where AFC businesses have filed suspicious activity reports or otherwise reported suspected or known criminal violations or suspicious activities to the AFC Compliance Officer(s) or to the law enforcement authorities, AFC employees **must not** notify any person outside of AFC who may be involved in the transaction or any person who is the subject of a suspicious activity report or other report of suspicious activity that the transaction has been reported.

Training

2.7 All AFC's professional employees must undertake anti- money laundering training on an annual basis.

2.7.1 The training shall review applicable money laundering laws and recent trends in money laundering activity, terrorism financing as well as the particular AFC policies and procedures to combat money laundering, prevent financing of terrorism, including how to recognize and report suspicious transactions.

2.7.2 Records shall be kept of all formal training conducted. These records should include the names and business units of attendees and dates and locations of the training.

2.7.4 If AFC representatives are asked to speak on the topic of money laundering or Know Your Customer policies and procedures at an external conference, consistent with the AFC's Corporate Communications Policy; they should immediately notify and

obtain the approval of the designated Compliance Officer(s) before making a commitment to speak.

Periodic Assessment

2.8 AFC shall conduct assessments of its anti-money laundering policies and procedures on a periodic basis to provide reasonable assurance that the compliance framework continues to function effectively. The assessment process should include testing and analysis. This testing shall be conducted independently by Internal Audit during its annual review.

3. AFC ANTI-MONEY LAUNDERING COMPLIANCE

AFC's designated Compliance Officers shall be responsible for coordinating and monitoring day-to-day compliance with applicable money laundering laws and this Policy. The AFC's designated Compliance Officers shall be the Chief Risk Officer (for every aspect of this policy except the aspects covering the application and interpretation of relevant laws and regulations) and the General Counsel (for all aspects of this policy covering the application and interpretation of relevant laws and regulations). The designated officers shall be AFC Executives or senior executive management staff with direct reporting line to the President/CEO.

4. AUDIT AND RISK REVIEW

AFC's independent internal audit function's review is another important means to protect AFC and its businesses from being used by money launderers and terrorists. Internal Audit will evaluate AFC businesses' compliance with this Policy, and applicable money laundering and CFT laws.

5. Anti bribery and anti corruption

AFC is committed to complying with all local and international anti-bribery and anti-corruption laws and to seeking and retaining business on the basis of merit, not through bribery and corruption.

All AFC's employees are strictly prohibited from receiving, accepting, offering, paying or authorizing any bribe or any other form of corruption. This prohibition extends to third parties such as family members or associates of a public official.

Our definition of a bribe is any form of improper payment including cash and includes other direct or indirect advantages such as inappropriate gifts, entertainment, charitable contributions, and offers of employment.

Contractual agreements from AFC to Borrowers and Investee companies makes it clear that AFC reserves the right to terminate relationships if the Borrower or Investee company engages in any form of corruption or bribery.

5.1 To protect our firm from corruption and bribery we do the following:

- Provide all staff with anti-bribery and anti-corruption training at least annually. At the end of the training, staff will certify they have read and understand the AFC Anti-moneylaundering and combating financing of terrorism policy. Record and monitoring of gifts and invitations to and from AFC personnel.
- We engage a firm independent from AFC to maintain our whistleblowing hotline for reporting suspicious cases, bribery, and corruption anonymously. At AFC whistleblowers are protected from retaliation, for providing evidence of a violation of any law.

The external service provider for AFC's ethics and Whistle Blowing service is Deloitte.

Contact Deloitte Tip-offs Anonymously:

- Whistle-blowing Hotlines: 0800TIPOFFS
- Web Portal: <https://tip-offs.deloitte.com.ng>
- E-mail: tip-offs@deloitte.com.ng
- Mobile App: Download Deloitte Tip-offs Anonymous App on your Android or iOS devices.

6. POLICY OWNER

The joint-ownership of this policy lies with the Chief Risk Officer and the General Counsel. Any deviation from the standards set forth in this Policy requires the approval of the Policy owners. Requests for deviations from the approved policy can only be granted by the President/CEO, upon written recommendation from the designated Compliance Officers.

7. CONCLUSION

Adherence to this Policy is absolutely essential so that all AFC businesses, wherever located, comply with applicable money laundering laws. AFC businesses must be proactive in the implementation of this Policy. AFC employees must be vigilant for suspicious activity and promptly refer such activity to appropriate personnel so that all reporting and other requirements are met. Only through constant vigilance can AFC employees protect AFC products and services from being used to launder money.

APPENDIX 1



KNOW YOUR CLIENT (KYC) DATA FORM

A. CLIENT INFORMATION AND IDENTIFICATION		
1. Client Name:		
2. Industry/Product Group		
<input type="checkbox"/> Oil and Gas	<input type="checkbox"/> Telecommunication	<input type="checkbox"/> Private Equity
<input type="checkbox"/> Power	<input type="checkbox"/> Mining	<input type="checkbox"/> Financial Market
<input type="checkbox"/> Heavy Industry	<input type="checkbox"/> Project Finance	<input type="checkbox"/> Asset Management
<input type="checkbox"/> Transport Infrastructure	<input type="checkbox"/> Equipment Finance	
3. Primary Business Address:		
4. Country:		
5. Telephone Number:	Telefax Number:	
6A. Internet website:		
6B. Is this transaction compliant with US Foreign Account Tax Compliance Act (FATCA) Yes / No?		
7. Type of Legal Entity		
<input type="checkbox"/> Public Corporation	<input type="checkbox"/> State or Municipality	
<input type="checkbox"/> Private Corporation	<input type="checkbox"/> Government Agency	
<input type="checkbox"/> Partnership	<input type="checkbox"/> Sovereign	
<input type="checkbox"/> Special Purpose Entity	<input type="checkbox"/> Supra-national	
8. Primary Contact Person at Client (name, telephone and position):		
9. Alternate Contact Person at Client (name, telephone and position):		
10. Names and Titles of Principal officers (e.g. Chairman, Chief Executive Officer, Chief Financial Officer, Minister, Governor, Director General, Legal counsel)		
<u>Name</u>	<u>Title</u>	<u>E-mail</u>
<u>Telephone</u>		

11. Description of Client's Business Operations, and number of years in operation:

12a. List names of owners (including ultimate beneficial owner), and percentage of ownership (Greater than or equal to 5%):

<u>Beneficial Owners/Shareholder's Name</u>	<u>% Ownership</u>
<u>Country of Residence</u>	

Has the entity been under the same ownership for the past five years? Yes No
If No, explain the changes in ownership:

Is the Client owned (5% or more) or controlled by a Senior public figure? Yes No
If Yes, provide further explanations:

12b. List all subsidiaries and other affiliated companies:

13. Obtain evidence of the creation of the legal entity (attach document)

Legal Status:

Government-issued Business License License Type: _____

Certified Articles of Incorporation

Signed General Partnership Agreement

Signed Limited Partnership Agreement

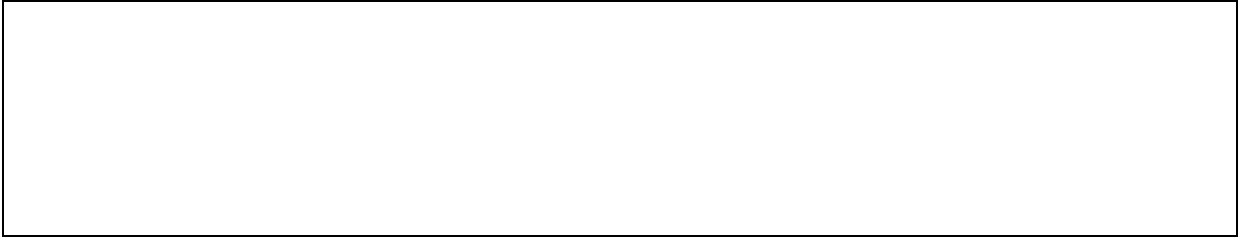
Other Legal Formation Document: _____

If legal formation document has a government issued ID number associated with it, please list the government issued ID number:

Place and Date of Issuance: _____

Expiration Date, if any:

14. Please attach the latest audited financial statements, and the name and address of your external auditor:



15. Authorized Account Signatories:

Client's authorized signatories should complete the signature form below, and state the signing instructions. Appropriate Board resolution should be provided to confirm the account signatories and the signing instructions. For the Board resolution to be acceptable, it must be provided directly by the customer's Company Secretary/ Chief Legal Officer.

Name of Signatory
Specimen Signature

Position

Class

Signing Instructions



B. REFERENCES

16a. Banking reference, a bank with whom your organization has banking relationship.

Name of Bank:

Address of Bank:

Email Address:

Phone:

Length of relationship in years:

Relationship Manager:

16b. Customer reference, an organisation to whom you provide goods or services.

Name of Customer:

Address of Customer:

Email Address:

Phone:

Length of relationship in years:

Contact name:

16c. Customer reference, an organisation to whom you provide goods or services.

Name of Customer:

Address of Customer:

Email Address:

Phone:

Length of relationship in years:

Contact name:

C. ADDITIONAL INFORMATION

C1. Has any organization either; while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, ever been indicted for, charged with, or convicted of any criminal offense involving fraud, breach of fiduciary duty or breach of trust?

Yes

No

C2. Has any organization either; while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, ever been found liable, convicted or permanently or temporarily enjoined by a court, by reason of any act or practice involving fraud, breach of fiduciary duty or breach of trust?

Yes

No

C3a. Are you or any of the directors or executives of your company now the subject of any investigation or disciplinary hearing or proceeding by a governmental agency, regulatory body, or professional association?

Yes

No

C3b. Have you or any of the directors or executives of your company ever been the subject of any investigation or disciplinary hearing or proceeding by a governmental agency, regulatory body, or professional association in connection with any matter, which resulted in an adverse finding or a restriction on your activities?

Yes

No

C4a. Has any organization, either while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, ever been the subject of any investigation or disciplinary proceeding by a governmental agency, regulatory body, or professional association?

Yes

No

C4b. Is any organization of which you or any of the directors or executives of your company are currently a member of senior management, or in which you or any of the directors or executives of your company have a substantial ownership interest, now the subject of any investigation or disciplinary proceeding by a governmental agency, regulatory body, or professional association?

Yes

No

C5. Have you or any of the directors or executives of your company ever entered into an agreement concerning, or otherwise consented to any order or decree by a court, governmental agency or regulatory body in connection with, any securities law?

Yes

No

C6. Has any organization, either while you or any of the directors or executives of your company were a member of senior management or while you had a substantial ownership interest, ever entered into an agreement concerning, or otherwise consented to any order or decree by a court, governmental agency or regulatory body in connection with any securities

law?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

C7. During the past 10 years, have you or any of the directors or executives of your company been a named defendant in any civil legal action involving commercial disputes or creditor's claims (including but not limited to debt collection lawsuit, foreclosure, receivership, and involuntary liquidation) of greater than USD 10,000 (or equivalent in other currencies)?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

C8a. During the past 10 years, has any organization, either while you or any of the directors or executives of your company were a member of senior management or when you had a substantial ownership interest, been a named defendant in any civil legal action involving commercial disputes or creditor's claims (including but not limited to debt collection lawsuit, foreclosure, receivership, and involuntary liquidation) of greater than USD 10,000 (or equivalent in other currencies)?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

C8b. If "yes", did the subject matter involve your personal or any of the directors or executives of your company conduct or fall within your area of responsibility?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

N/A	<input type="checkbox"/>
-----	--------------------------

C8c. If the answer to question A8a is "yes", were you or any of the directors or executives of your company active in settlement negotiations or arbitration?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

N/A	<input type="checkbox"/>
-----	--------------------------

C9a. Have you or any of the directors or executives of your company, as a result of your role as a member of senior management or as a member of the board of directors of any entity been a named defendant in any civil legal action involving (i) shareholder litigation, (ii) fraud or misrepresentation, or (iii) breach of fiduciary duty?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

C9b. If "yes", did the subject matter involve your personal conduct or any of the directors or executives of your company or fall within your area of responsibility?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

N/A	<input type="checkbox"/>
-----	--------------------------

C9c. If the answer to question A9a is "yes", were you active or any of the directors or executives of your company in settlement negotiations or arbitration?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

N/A	<input type="checkbox"/>
-----	--------------------------

C10. Have you or any of the directors or executives of your company, in your individual capacity, ever been a named defendant in any civil legal action involving (i) shareholder litigation, (ii) fraud or misrepresentation, or (iii) breach of fiduciary duty?

Yes	<input type="checkbox"/>
-----	--------------------------

No	<input type="checkbox"/>
----	--------------------------

C11. During the past 10 years, have you or any of the directors or executives of your company filed voluntarily, or had filed against you or any of the directors or executives of your company involuntarily, a bankruptcy petition?

Yes

No

C12. During the past 10 years, has any organization, either while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, filed voluntarily, or had filed against such organization involuntarily, a bankruptcy petition?

Yes

No

C13. Have you or any of the directors or executives of your company ever failed to pay when due any debt to a Government, or guaranteed by the Government (including but not limited to taxes, business loans, etc.)?

Yes

No

C14. Has any organization, either while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, ever failed to pay when due any debt to a Government or guaranteed by a Government (including but not limited to taxes, business loans, etc.)?

Yes

No

C15a. Has any organization, either while you or any of the directors or executives of your company were a member of senior management or when you or any of the directors or executives of your company had a substantial ownership interest, ever benefitted from a relationship with a political exposed person(s)?

Yes

No

C15b Have you or any of your directors or executives of your company been investigated, charged, prosecuted, or convicted of bribery, money laundering, terrorism, terrorist financing, narcotics trafficking, organized crime, or related offenses?

Yes

No

Client Checklist		
10. Names of Principal Officers.	Certified copies of ID documents for at least two directors. (eg Passport). The passport must be valid and show the signature and photograph of the bearer.	
13. Evidence of the creation of the legal entity	Any of the documents listed in 13.	
14. Latest audited financial statements, and the name and address of your external auditor	Audited Financial Statements	
15. Authorised Account Signatories:	Board resolution to confirm account signatories and the signing instructions.	

Where original documents are not provided, copies must be certified as a true copy and photographs must be certified as a true likeness. Only members of the following professions can certify a document, Lawyer, Accountant, Manager of regulated credit or financial institution, Notary Public, Member of Judiciary, Senior Civil Servant, an Embassy, Consulate or High Commissioner of the country of issue of the document, Serving Police Officer or Customs Officer.

D. CLIENT INFORMATION VERIFICATION – FOR AFC INTERNAL USE ONLY

1. Site visit. (Attach Call Report)

Describe results:

Date of client visit: _____ Location (full address): _____

Indicate Parent Local Office

Persons(s) visited: _____ By Whom:

2. Were any material discrepancies noted during the verification process? Yes
No

If Yes, please explain and describe how it was resolved:

3. Is the client experiencing any circumstances (e.g. financial difficulties, industry/business investigation, government intervention, business/management reputation concerns, political instability, major economic problems) that could impact the reputation and/or viability of the client or has the client been subject to negative press, particularly with respect to money laundering matters? Yes No

If Yes, explain the nature of this adverse information and why continued pursuit of the client relationship is considered appropriate:

4a. Market reputation of the Client: (include comments obtained from external intelligence gathered from bankers, industry, media and other reliable sources):

4b. Obtain evidence of a response from the references in 16a Banking Reference, 16b Customer Reference and 16c Customer Reference? For advisory transactions, the response must be received before Early Investment Memorandum and for Investment divisions, the response must be received before Final Investment Memorandum.

Yes No

5. Names and Locations of Major Suppliers or Contractors:

6. Names and Location of Major Customers of the Client:

7. Is the Client aware of Money Laundering and other financial crimes?

8. Does the Client have written policies and procedures on ethical business conducts?

9. Name of Primary Contact in AFC:

AFC Internal Checklist				Verified by
10. Names of Principal Officers.	Check basic details on Google, and that there are no flags on World Check.	ID Memo	Relationship Owner	
10. Names of Principal Officers.	Certified copies of ID documents for all directors. (eg Passport). The passport must be valid and show the signature and photograph of the bearer.	FIM	Relationship Owner	
12. List names of owners (including ultimate beneficial owner), and percentage of ownership (Greater than or equal to 25%):	Check basic details on Google, and that there are no flags on World Check.	EIM	Relationship Owner	
13. Evidence of the creation of the legal entity	Any of the documents listed in 13.	EIM	Legal	
14. Latest audited financial statements, and the name and address of your external auditor	Audited Financial Statements	FIM	Investment Group	
15. Authorised Account Signatories:	Board resolution to confirm account signatories and the signing instructions.	FIM	Legal	

REVIEW AND APPROVAL

To ensure that this client is an appropriate client for AFC, it is important that all information required herein has been obtained and that the information is accurate and that such information has been verified and corroborated.

KYC prepared by:

ALL SIGNATURES IN THIS SECTIONS ARE REQUIRED

The Client Relationship Owner is responsible for ensuring the completeness and, to the best of his/her knowledge, accuracy of the information contained herein.

Client Relationship Owner
Date

Signature

The Client Relationship Owner's Business Head or designee, after a review of the KYC form, must confirm and concur that the client is an appropriate client for AFC.

Client Relationship Owner's Business Head
Date

Signature

The Legal counsel or designee has reviewed the KYC package and has performed further diligence, if necessary.

Chief Risk Officer
Date

Signature