

KYC and Anti-Money Laundering Questionnaire for Financial Institutions

I. General Information:

Full Name of Financial Institution	JSC TBC Bank
Legal Form	Joint Stock Company
Registration Number	5/5-20
Date of Registration	04.01.1996
Swift, BIC	TBCBGE22
Tax Identification Number	204854595
License Type	Banking
License Number	N 85
Country of Licensing Authority and Regulator	Georgia
License Issue Date	20.01.1993
License Issued By	National Bank of Georgia
Date and Place of Incorporation	17.12.1992, Georgia
Registered Address	7, Marjanishvili, Str , Tbilisi, Georgia
Location of Head Office	7, Marjanishvili, Str , Tbilisi, Georgia
Contact Information: <ul style="list-style-type: none"> Website Address Telephone Fax E-mail 	www.tbcbank.ge +(995 32) 2 272727 +(995 32) 2 772774 info@tbcbank.com.ge
Ratings (if any)	https://tbcbankgroup.com/investors/credit-ratings/
Number of Branches/representative offices: <ul style="list-style-type: none"> Inside of the Country Outside of the Country 	146 N/A
Number of Employees	Approximately 6300
External Auditor	PWC

II. Nature of business

Main / secondary activities:

TBC Bank offers wide range of products to its customers: retail, micro, small and corporate loans and deposits, trade finance products, credit cards, merchant business, remittances, etc.

Retail banking

TBC Bank is the undisputed leader in the retail segment, which it has been serving since 2006. We work diligently to offer our clients the best products and services in the market. We are committed to

building trusted, mutually beneficial relationships with our customers by concentrating on their financial needs and offering them well-suited banking solutions. Customer satisfaction is a vital part of our success and we are dedicated to delivering a unique experience in all our channels. We also pride ourselves on having advanced private banking offerings for our affluent and high-net-worth individuals, which include dedicated multichannel, full life cycle management, tailor-made products and value-added services. The retail segment represents 56% of the total deposit portfolio and 49% of the total loan portfolio. The Bank serves more than 2 million retail customers.

Corporate and investment banking (CIB)

TBC Bank has a well-deserved leading position in the corporate segment due to its advisory model, focus on long-term partnership, top-quality financial products and services, and highly experienced and professional team. We have a strong presence and a diversified portfolio across all major sectors of Georgia's economy, divided among dedicated coverage teams with strong sector knowledge. We have strong positions in traditional lending and trade finance products, and have also started introducing brokerage and advisory services through our subsidiary, TBC Capital. Thanks to our broad product offering and operational excellence, an increasing number of leading industry players is choosing TBC Bank as their core bank. Corporate Banking represents 29.0% of TBC's total loan portfolio and 31% of the total deposits portfolio. The Bank serves more than 3,000 corporate customers.

MSME banking

TBC Bank is the bank of first choice for most MSME clients, with 63% of new companies registered in Georgia in 2017 opening accounts with TBC Bank. We do not find this surprising, since we put a lot of effort into developing the most convenient and innovative solutions for our clients. In addition, we differentiate ourselves by offering extensive non-financial services through our business support program, which features various opportunities for training sessions, individual consultations, useful business tools and a renowned annual business award ceremony. This year, we have also undertaken an initiative to support the new generation of businesses in Georgia by launching a unique program, focused on start-ups, that provides financial and non-financial services to early-stage companies. MSME banking accounted for 22% and 13% of TBC's total loans and total deposits portfolios, respectively. The Bank serves approximately 130,618 customers in Georgia.

III. Ownership Structure and Management Information

1	Is your Institution government-owned?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
2	Is your Institution listed on any stock exchange? <i>If yes, please provide the name of the stock exchange and Symbol</i> London Stock Exchange, TBCG https://profile.lsegissuerservices.com/TBCBankGroup/overview	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Is your Institution part of a Group? <i>If yes, please specify the Group</i> TBC Bank Group PLC, UK	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Is your Institution <input type="checkbox"/> Lead <input checked="" type="checkbox"/> Subsidiary?		
5	In case the answer to question 4 is "Subsidiary", please provide the name and the country of incorporation of the Lead Institution TBC Bank Group PLC, UK		

6. Please, provide information about shareholders holding 25% or more of your institution's share

#	Name of Shareholder	Percentage of share (%)	Address	Main type of activity
1	No single legal entity or natural person holds more than 25% of JSC TBC Bank shares			
2	N/A			
3	N/A			
4	N/A			

7. If your FI has an institutional shareholder, please provide a breakdown of its shareholding to enable us to identify any ultimate beneficial owner (natural person) that holds a 25 % stake in your institution

#	Name of Ultimate Beneficial Owner	Percentage of share (%)	Date of birth	Passport Country
1	No single legal entity or natural person holds more than 25% of JSC TBC Bank shares			
2	N/A			
3	N/A			
4	N/A			

8. Please, provide information about Management and Supervisory Board

Management Board

#	Name	Position	Date of Birth	Passport Country
1	https://tbcbankgroup.com/about-us/leadership/management-of-jsc-tbc-bank/			
2				
3				
4				

Supervisory Board

#	Name	Position	Date of Birth	Passport Country
1	https://tbcbankgroup.com/about-us/leadership/board-of-directors/			
2				
3				
4				

Is/Are any of your Senior Manager(s) or Shareholder(s) **PEP(s)**? ☐ Yes ☒ No
 If yes, please provide details

IV. Subsidiaries, Affiliates, Representative Offices and Branches outside the jurisdiction

	Company name	Country of registration	% share	Parent
1.	TBC BANK GROUP PLC	UK	Parent	
2.	JSC TBC BANK	GE	99.88%	TBC BANK GROUP PLC
3.	JSC TBC Insurance	GE	100%	TBC BANK GROUP PLC
4.	TBC International LLC	GE	100%	TBC BANK GROUP PLC
5.	TBC Pay LLC	GE	100%	JSC TBC BANK
6.	JSC TBC Leasing	GE	99,61%	JSC TBC BANK
7.	TBC Capital LLC	GE	100%	JSC TBC BANK
8.	TBC INVEST	IL	100%	JSC TBC BANK
9.	TBC Kredit LLC	AZ	100%	JSC TBC BANK
10.	JSC United Financial Corporation	GE	98,66%	JSC TBC BANK
11.	Banking Systems Service Company LLC	GE	100%	JSC TBC BANK
12.	LLC INDEX	GE	100%	JSC TBC BANK
13.	G Commerce	GE	100%	TBC International LLC
14.	SWOOP JSC	GE	100%	TBC International LLC
15.	ALL Property GE	GE	90%	TBC International LLC

V. Correspondent Banking Relationship

List of NOSTRO Correspondent Banks

#	Name of the Bank	Country/City	Currency of Accounts
1	CITIBANK N.A.	USA	USD
2	DEUTSCHE BANK TRUST COMPANY AMERICAS	USA, NEW-YORK	USD
3	DEUTSCHE BANK AG	GERMANY	EUR, JPY
4	COMMERZBANK AG	GERMANY, FRANKFURT, MAIN	EUR, USD, GBP, CHF, ILS, CZK, DKK, AED, PLN, AUD, SEK, NOK, CAD
5	ZAO UNICREDIT BANK	RUSSIA	RUB
6	PJSC ROSBANK	RUSSIA	RUB, USD
7	CITIBANK N.A. LONDON BRANCH	GREAT BRITIAN / LONDON	EUR, GBP
8	RAIFFEISEN ZENTRALBANK OSTERREICH	AUSTRIA / VIENNA	EUR, USD
9	SOCIETE GENERALE	FRANCE	EUR
10	KBC BANK NV	BELGIUM	EUR
11	ING BELGIUM NV/SA	BELGIUM	EUR, USD
12	CREDIT SUISSE (SCHWEIZ) AG	SWITZERLAND	CHF
13	TURKIYE IS BANKASI A.S.	TURKEY / ISTANBUL	TRY, USD
14	Aktif Yatirim Bankasi A.S.	TURKEY / ISTANBUL	USD, EUR
15	PASHA BANK OJSC	AZERBAIJAN, BAKU	AZN, USD, EUR
16	PROCREDIT BANK	GEORGIA, TBILISI	USD, EUR, RUB
17	CARTU BANK	GEORGIA, TBILISI	USD, GEL

18	BANK OF GEORGIA	GEORGIA, TBILISI	USD, EUR, GEL
19	LIBERTY BANK	GEORGIA, TBILISI	USD, EUR, GEL
20	TERABANK	GEORGIA, TBILISI	GEL, USD, EUR

List of LORO Correspondent Banks

#	Name of the Bank	Country/City	Currency of Accounts
1	JSC 'ARARAT BANK'	ARMENIA	GEL, USD, EUR
2	ACBA-CREDIT AGRICOL BANK CJSC	ARMENIA	GEL, USD
3	JSC 'BANK OF BAKU'	AZERBAIJAN	USD, EUR
4	JSC MUGANBANK'	AZERBAIJAN	USD, EUR, RUB
5	RABITABANK OJSC	AZERBAIJAN	USD, GEL
6	JSC VTB BANK GEORGIA	GEORGIA, TBILISI	USD, EUR, CHF, GEL
7	JSC TERABANK	GEORGIA, TBILISI	USD, EUR, GBP, CHF
8	JSC BASIS BANK	GEORGIA, TBILISI	USD, EUR, CHF, GEL
9	JSC TC ZIRAAT BANKASI, TBILISI BRANCH	GEORGIA, TBILISI	USD, GEL
10	JSC PROCREDIT BANK	GEORGIA, TBILISI	USD, EUR, GEL
11	JSC CARTU BANK	GEORGIA, TBILISI	USD, EUR, GEL
12	JSC HALYK BANK - GEORGIA	GEORGIA, TBILISI	USD, EUR, GEL
13	JSC PASHA BANK - GEORGIA	GEORGIA, TBILISI	USD, EUR, GBP, GEL, RUR
14	JSC ISBANK – GEORGIA	GEORGIA, TBILISI	USD, GBP, GEL
15	JSC LIBERTY BANK	GEORGIA, TBILISI	USD, EUR, GEL
16	JSC FINCA BANK GEORGIA	GEORGIA, TBILISI	USD, EUR, GEL
17	JSC SILK ROAD BANK	GEORGIA, TBILISI	USD, EUR, GEL
18	JSC CREDO BANK	GEORGIA, TBILISI	GEL, USD, EUR, GBP, RUB

a) If you provide Correspondent Banking Services to other financial institutions (LORO accounts), please indicate below the services you provide

Type of Service	Yes	No
Cash Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Foreign Exchange	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Local Currency Clearing	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Foreign Currency Clearing (Bank to bank and bank to customer)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Check Clearing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other (please list)		

b) Do you provide with nested services to the LORO account holders (customer to customer foreign currency transactions)?
 If yes, please provide more information on those financial institutions: name, country of registration, activity description, currencies offered

TBC Bank doesn't provide Customer to Customer (nested relationship) foreign currency clearing services to the LORO account holders.

c) Do you allow your customers to use your account with other financial institutions as payable through accounts?
 If yes, please provide more information: name, country of registration

TBC Bank doesn't allow to its customers to use the Banks correspondent accounts with other financial institutions as payable through accounts.

VI. Client Base

a) Please, provide the statistical information about your client base

Business Specialization	Percentage
Private Individuals	94.43%
Corporate	0.12%
MSME	5.45%

b) Do you provide financial products or services to below listed types of clients?

(Please, mark in case of aforementioned clients comprise **5%** or more of the bank's clients)

Type of Client	Yes	No
Non-resident Customers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Walk-in Customers (non-account based customers)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
"Gatekeepers" such as accountants, lawyers, notaries or other professionals where the identity of their clients is not disclosed	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Trusts	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shell Companies	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Money Remittance Services/Payment Service Providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Currency Exchange Bureaus/Pawn Shops other financial service providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Casinos, Gaming and Gambling (online) businesses	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Precious Gem Dealers/Mining Industries and Commodity Traders/Providers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-Government Organizations, Charities and Funds	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Government Entities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Embassies and/or Consulates	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Professional Service Providers (intermediaries between a client and a bank e.g. lawyers)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Red Light Businesses (providers of adult entertainment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Arms manufacturers, dealers and intermediaries	<input type="checkbox"/>	<input checked="" type="checkbox"/>

c) Does the bank have relationship with:

Type of Bank	Yes	No
Shell Banks*	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Offshore Banks	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*A shell Bank is defined as a FI incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group

If yes, please provide more information (name, location, activity description, currencies offered).

VII. Fast money transfer companies

Do you offer remittance services through money transfer companies?
(If yes, please give the list of money transfer companies/providers)

Name of the Money transfer company	Yes	No
Western Union	<input checked="" type="checkbox"/>	<input type="checkbox"/>
MoneyGram	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contact/ QIWI Bank	<input checked="" type="checkbox"/>	<input type="checkbox"/>
UniStream	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (please list): IntelExpress, RicoGram, RIA, Zolotaia Korona		

AML Policies, Procedures and Practices

VIII. Governing Laws

1	Are there Specific Laws/Regulations in place covering Anti –Money Laundering in your Institution’s country?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	If yes, please list the name and the date of issue of relevant laws The Law of Georgia On Facilitating the Prevention of Illicit Income Legalization (Published in the “Legislative Herald of Georgia” #17, Article 113, June 16, 2003)		
3	Is your FI subject to such laws?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Name of your Financial Intelligence Unit (FIU): Financial Monitoring Service of Georgia https://www.fms.gov.ge/		
5	Please specify name and website of your Supervisory Authority National Bank of Georgia https://www.nbg.gov.ge		

IX. General AML Policies, Procedures and Practices:

1	Has the FI established internal written policies and procedures to ensure compliance with the obligations under the existing national legislation on prevention of money laundering and counter terrorist financing? <i>Approval body of policies:</i> Management Board and Supervisory Board	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the FI have a compliance and regulatory program of AML and combat the Financing of Terrorism that is approved by the FI’s board or a senior committee?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Do the AML policies and procedures apply to all branches and subsidiaries both in the home country and in locations outside of that jurisdiction?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Does the FI have a designated officer that is responsible for coordinating and supervising the AML program? <i>If yes, please provide name and contact information of an officer</i> <i>Name:</i> Alina Kvanchiani <i>Title:</i> Head of AML Unit <i>e-mail:</i> AKvanchiani@Tbcbank.com.ge <i>phone:</i> +995322272727 (2402)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5	In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? <i>Please specify the frequency of audit:</i> At least once a year	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6	Does the FI have a policy prohibiting accounts/relationships with Shell Bank?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7	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?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
8	Does the FI have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
9	Does the FI have record retention procedures that comply with applicable law?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

10	Does the FI have policies to ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
11	Does the FI prohibit the opening of anonymous or numbered accounts?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

X. Risk Assessment

1	Does the FI have a risk focused assessment of its customer base and their transactions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the FI have policies to apply enhanced due diligence procedures in connection with higher risk clients?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

XI. Know Your Customer, Due Diligence and Enhanced Due Diligence Procedures

1	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the FI have written policies and procedures in place regarding Know-Your-Customer practices?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the FI have a requirement to identify and verify the identity of customers and to collect information regarding its customers' business activities?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Does the FI require walk-in customers to provide identification documents before providing any service?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5	Does the FI assess its FI customers' AML policies or practices?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6	Does the FI conduct on-going due diligence and scrutiny, to ensure the information provided is updated and relevant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7	Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
8	Does the FI have policies and procedures that require keeping all the records connected to customer identification and their transactions? <i>If yes, for how long?</i> <i>At least for 6 years</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
9	Does the FI analyze the normal and expected transactions of the customers based on the risk assessment of your institutions customers?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

XII. FATCA

1	Is your institution FATCA Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	If Yes , please provide FATCA status of the FI and note which Model has the Bank chosen (IGA1/ IGA2) <i>IGA1</i>		
3	Does the FI have GIIN?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	If Yes, please specify the date of the FI registration with IRS and provide GIIN <i>YWY4EU.00000.LE.268.</i>		

XIII. Reporting

1	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Are there (in your residence country) any penalties for non-compliance with reporting requirements? If Yes, please specify: https://www.fms.gov.ge/Uploads/files/AML_Law_04.05.2018_English.pdf	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	Has your Institution ever been the subject of any investigation, prosecution, conviction or civil enforcement action related to money laundering and terrorists financing?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
5	When was the last external inspection of your bank? (e.g. supervisory agency, external audit, etc.) May, 2017		

XIV. Transaction monitoring

1	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveler's checks, money orders, etc.?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2	Does the FI have a screening process to search a client database against government published lists of prohibited parties?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the FI have a screening process to search a client database against international black lists?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4	In case the answer to question 2 and 3 is YES, please specify is the client screening process completed through an automated system? <i>In case of Yes, please, provide the name of the system:</i> SIRON_KYC provided by FICO TONBELLER Please provide the information against which lists the FI screens its customers and transactions: EU - European Union and its member states, US - United States Treasury Department's Office of Foreign Assets Control (OFAC) , UN - United Nations Security Council, UK - HM Treasury United Kingdom, France- The Treasury Directorate-General, PEP List, Internal black list. Do you maintain the lists by yourself or do you use third party providers? The Bank uses Thomson Reuters WorldCheck and Accuity WorldCompliance databases	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
5	If the client screening process is conducted manually, please provide the frequency in which the screening is conducted. N/A		

XV. Training

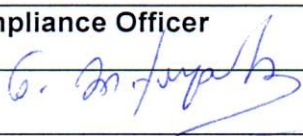
1	Does the FI provide training to relevant employees on: <ul style="list-style-type: none"> Identifying and reporting transactions that must be reported to the authorities; 	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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	<ul style="list-style-type: none"> Examples of different forms of money laundering involving the FI's products and services; Internal policies to prevent money laundering. 		
2	Does the FI keep records of training sessions, including attendance records and relevant training materials used?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
3	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

XVI. Documents to be attached with your answers

	Documents	Enclosed	Web link
1	List of products	<input type="checkbox"/>	http://www.tbcbank.ge/web/en/
2	Copies of the AML/KYC Policies and Procedures	<input type="checkbox"/>	http://www.tbcbank.ge/web/en/web/guest/aml
3	Copy of latest Annual Report	<input type="checkbox"/>	https://tbcbankgroup.com/investors/results-center/
4	Management Structure	<input type="checkbox"/>	https://tbcbankgroup.com/about-us/governance/overview/

I hereby confirm that the information above is accurate to the best of my knowledge as of 22/04/2019, and I'm authorized to complete the Questionnaire on behalf of JSC TBC Bank.

Name: Natia Mikautadze
Title: Chief Compliance Officer
Signature: 
Date: 30/04/2019