

KNOW YOUR CUSTOMER
ANTI-MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM
QUESTIONNAIRE

Section I – General Administrative Information	
Legal Name of Institution	China Construction Bank New York Branch
Legal Form	State licensed Branch
SWIFT Address / Website	PCBCUS33; www.ccb.com
Principal Place of Business (Address)	1095 Avenue of the Americas, New York, NY 10036
Registered at / Banking License issuing authority 、 date and number	New York State Banking Department license issued on 18 February, 2009.
Does your Institution maintain a physical presence ¹ in the licensing country?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Is your institution an agency, branch or subsidiary of a bank with a physical presence?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
If yes, please answer the following questions :	
• Name of affiliate / parent company: China Construction Bank Corporation	
If yes, list exchanges and symbols: Hong Kong Stock Exchange (Code “939”)	
• Indicate affiliation: agency <input type="checkbox"/> branch <input checked="" type="checkbox"/> subsidiary <input type="checkbox"/>	
• Licensing country of affiliate: People’s Republic of China	
Is your institution a publicly traded entity ² ?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
• If yes, please list the exchanges & symbols: Hong Kong Stock Exchange (Code “939”)	
Officer Responsible for Account / Relationship : Thomas Rosatelli, Head of Operations	Secondary Contact : Nancy Cheng
Telephone No. : 646-781-2460	Telephone No. : 646-781-2467
Fax No. : 646-781-2469	Fax No. : same
E-mail Address : thomas.rosatelli@ccbny.com	E-mail Address : nancy.cheng@ccbny.com

¹ Physical presence means your institution maintains a physical place of business, other than an electronic address, in a country where it is authorized to conduct banking activities, at which it employs at least one employee on a full-time basis and maintains records of its banking activities, and is subject to supervision by the regulators of the country authorizing the institution’s license.

² If your institution is an agency, branch or subsidiary of a publicly traded entity that is listed on one of the exchanges listed in Appendix B, the answer to the question should be “Yes.”

Section II – Scope of Business Activities

Please list the principal countries in which your institution maintains branches, agencies and subsidiaries. Additionally, please indicate the type of operation and the number of offices or locations. (Please attach additional pages if necessary.)

Country	Type (Branch, Agency, Subsidiary, etc.)	Number
Please see Annual Report		

Please list the principal areas of business in which your institution participates in terms of contribution to revenue.

Principal areas of business activity (Commercial, Private, Corporate, Wholesale, Insurance, etc.)	Approximate percent of revenue
Please see Annual Report	

Section III– Ownership and Management Information (Only for use when the subject institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B)

If your institution is not a publicly traded entity on one of the stock exchanges listed in Appendix B, please list the names of the owners of your institution and their ownership interest. (For purposes of this questionnaire, an “owner” is any person or juridical entity that, directly or indirectly, owns, controls or has voting power of twenty percent (20%) or more of any class of securities of your institution.)

Name of Institution	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)
Please see Annual Report		

If any of the foregoing owners is a juridical entity, please list the names of the shareholders of the legal entity, and their ownership interest in the legal entity³. (Please attach additional sheets if necessary).

Name of Entity	Shareholders	Ownership Interest (%)	Nature of Ownership (Direct/Indirect)
Please see Annual Report			

³ If the second tier shareholders are also juridical entities, the third tier shareholder’s names, ownership interests, and nature of ownership shall also be listed. This exercise should continue through the required number of iterations until the true beneficial owners are identified. Note: If any legal entity is publicly held, please indicate only that it is publicly held and the exchange on which shares are traded.


Please list the names of the principal officers and directors of your bank, their respective positions, and the number of years they have been employed by the bank. (Please attach additional sheets if necessary).

Name	Position	Years of Service

Please see Annual Report		
Are there any Politically Exposed Persons ⁴ among your Institution's ownership structure and executive management? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> Please see Annual Report		

⁴ Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public functions, for example Head of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials, or their family members or close associates. The definition is not intended to cover middle ranking of more junior individuals in the foregoing categories (cf. FATF Forty Recommendations).

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Signature : 

Completed by: Alexander Noskov
Position : Head of Compliance
Date : 3/14/2012
Name of Institution : China Construction Bank New York Branch
Address of Institution : 1095 Avenue of the Americas, New York, NY 10036
E-mail : Alexander.Noskov@ccbny.com

KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING & COUNTERING THE FINANCING OF TERRORISM CONTROLS		
	Yes	No
1.Does the AML CFT, and KYC compliance program require approval of your institution's Board or a senior committee thereof?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2.Does your Institution have a legal and regulatory compliance program that	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>



includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of the FI?		
3.Has your Institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	Yes X	No <input type="checkbox"/>
4.In addition to inspections by the government supervisors / regulators, does your institution's client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Yes X	No <input type="checkbox"/>
5.Does your Institution 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 X	No <input type="checkbox"/>
6.Does your Institution have policies covering relationships with politically exposed persons consistent with industry best practices?	Yes X	No <input type="checkbox"/>
7.Does your Institution have appropriate record retention procedures pursuant to applicable law?	Yes X	No <input type="checkbox"/>
8.Does your Institution require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?	Yes X	No <input type="checkbox"/>
9.Does your Institution have a risk focused assessment of its customer base and transactions of its customers?	Yes X	No <input type="checkbox"/>
10.Does your Institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your Institution has reason to believe pose a heightened risk of illicit activities at or through the FI?	Yes X	No <input type="checkbox"/>
11.Has your Institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country / state that issued it)?	Yes X	No <input type="checkbox"/>
12.Does your Institution have a requirement to collect information regarding its customers' business activities?	Yes X	No <input type="checkbox"/>
13.Does your Institution collect information and assess its FI customers' AML policies or practices?	Yes X	No <input type="checkbox"/>

14.Does your Institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	Yes X	No <input type="checkbox"/>
15.Does your Institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	Yes X	No <input type="checkbox"/>
16.Does your Institution have policies or practices for the identification and reporting of transactions that are required to be reported to the	Yes X	No <input type="checkbox"/>



authorities?		
17.Does your Institution have procedures to identify transactions structured to avoid large cash reporting requirements?	Yes X	No <input type="checkbox"/>
18.Does your Institution screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	Yes X	No <input type="checkbox"/>
19.Does your Institution 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? (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 X	No <input type="checkbox"/>
20.Does your Institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	Yes X	No <input type="checkbox"/>
21.Does your Institution have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travelers checks, money orders, etc.)?	Yes X	No <input type="checkbox"/>
22.Does your Institution provide AML training to relevant employees that includes 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?	Yes X	No <input type="checkbox"/>
23.Does your Institution retain records of its training sessions including attendance records and relevant training materials used?	Yes X	No <input type="checkbox"/>
24.Does your Institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	Yes X	No <input type="checkbox"/>
25.Does your Institution employ agents to carry out some of the functions of the FI and if so does the FI provide AML training to relevant agents that includes 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?	Yes X	No <input type="checkbox"/>

26.Does your Institution provide payable through accounts ? (if Yes, please comment)	Yes <input type="checkbox"/>	No X
27.Has your institution had any regulatory or criminal enforcement actions resulting from violations of AML laws or regulations in the last five years ? (if Yes, please comment)	Yes <input type="checkbox"/>	No X



中国建设银行

China Construction Bank

New York Branch

The undersigned, based on his/her best knowledge and belief, certifies that the aforementioned questions were answered considering the existing internal controls of the subject financial institution, and further present an accurate representation of the existing state of the institution's AML, CFT, and KYC internal controls and financial service activities.

Signature :

Completed by:

Alexander Noskov

Position :

Head of Compliance

Date :

3/14/2012

Name of Institution :

China Construction Bank New York Branch

Address of Institution :

1095 Avenue of the Americas, 33rd Floor, New York, NY 10036

E-mail :

Alexander.Noskov@ccbny.com

**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &
COUNTERING THE FINANCING OF TERRORISM — APPENDIX A**

This is the list of the institution's agencies, branches, and subsidiaries to which the certification of adherence in the representation letter applies :



中国建设银行

China Construction Bank

New York Branch

See USA Patriot Act Certification executed by CCB Head Office dated May 11, 2009.

**KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING &
COUNTERING THE FINANCING OF TERRORISM — APPENDIX B**

Stock Exchanges

- Alberta Stock Exchange
- American Stock Exchange
- Athens Stock Exchange
- Australian Stock Exchange
- Bermuda Stock Exchange
- Bolsa de Comercio de Buenos Aires
- Bolsa de Comercio de Santiago
- Bolsa de Valores de Caracas
- Bolsa de Valores de Lima
- Bolsa de Valores de Rio de Janeiro
- Bolsa de Valores de São Paulo
- Bolsa Mexicana de Valores
- Bolsas y Mercados Españoles
- Boston Stock Exchange
- Bourse de Luxembourg
- Bourse de Montreal
- BSE The Stock Exchange, Mumbai
- Bucharest Stock Exchange
- Budapest Stock Exchange Ltd.
- Chicago Board Options Exchange
- Chicago Stock Exchange
- Colombo Stock Exchange
- Copenhagen Stock Exchange
- Cyprus Stock Exchange
- Deutsche Börse Ag
- Euronext Amsterdam
- Euronext Belgium
- Euronext Brussels
- Euronext Lisbon
- Euronext Paris
- HEX Plc
- Hongkong Exchanges and Clearing
- Irish Stock Exchange
- Istanbul Stock Exchange
- Italian Exchange
- Jakarta Stock Exchange
- Jamaica Stock Exchange
- JSE Securities Exchange, South Africa
- Korea Stock Exchange
- Kuala Lumpur Stock Exchange
- Ljubljana Stock Exchange
- London Stock Exchange
- Malta Stock Exchange
- NASD
- National Stock Exchange of India, Ltd.
- National Stock Exchange of Lithuania
- New York Stock Exchange
- New Zealand Stock Exchange
- Osaka Securities Exchange
- Oslo Bors
- Philippine Stock Exchange
- Prague Stock Exchange
- Shanghai Stock Exchange
- Shenzhen Stock Exchange
- Singapore Exchange
- Stock Exchange of Hongkong
- Stock Exchange of Tehran
- Stock Exchange of Thailand
- Stockholmsbörsen
- SWX Swiss Exchange
- Taiwan Stock Exchange Corp.
- Tel Aviv Stock Exchange
- Tokyo Stock Exchange
- TSX Toronto Stock Exchange
- Vancouver Stock Exchange
- Warsaw Stock Exchange
- Weiner Börse Ag
- Winnipeg Stock Exchange