



GENERAL INFORMATION ABOUT COLLECTION AGENCY

Collection Agency's name and location:	Almenn Innheimta ehf.
Collection Agency's Tax ID, Company No.:	6702151720
Are the Collection Agency's shares listed on any stock Exchange market(s)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If „yes“ , what is the stock symbol	

ANTI MONEY LAUNDERING QUESTIONNAIRE

A) General policies, practices and procedures

1. Is your AML compliance programme approved by your board or a senior committee?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Do you have a legal regulatory compliance programme that includes a designated officer being responsible for coordinating and overseeing the AML framework?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Do you have developer written policies documenting the processes that you have in place to prevent, detect and report suspicious transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4. Do you have an internal audit function or another independent 3rd party that assesses your AML policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5. Do you have a policy prohibiting accounts/relations 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 not affiliated with a regulated financial group.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
7. Do you have policies covering relationship with politically exposed persons (PEPs), their relatives and/or close associates?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
8. Do you have a record retention procedure that complies with applicable laws?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
9. Do your AML policies and practices apply to all branches and subsidiaries, both in the home country and in locations outside of that jurisdiction?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
10. Do you operate under an off-shore license?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

B) Risk assessment

1. Do you have a risk based assessment of your customer base and their transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Do you determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions you have reason to believe they pose a heightened risk of illicit activities at or through your institution?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

C) Know Your Customer – enhanced due diligence

1. Have you implemented processes for the identification of those customers on whose behalf you maintain or operate accounts or conduct transactions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Do you have a requirement to collect information regarding your customer's activities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Do you assess your customer's AML policies or practices?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4. Do you have a process to review and, where appropriate, update customer information relating high risk client information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5. Do you have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
6. Do you complete risk-based assessment to understand the usual and expected transactions of your customer?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

D) Transaction Monitoring

1. Do you have a monitoring programme for unusual and potentially suspicious activities that cover funds transfers and monetary instruments such as traveler's checks, money orders etc.?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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E) Transaction Reporting

1. Do you have policies and practices for the identification and reporting of transactions a-that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Where cash transaction reporting is mandatory, do you have procedures to identify transactions structured to avoid such obligation?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Do you screen customers and transactions against a list of persons, entities or countries issued by government/competent authorities?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4. Do you have policies to reasonably ensure that you only operate with correspondent banks that possess licenses to operate in their country of origin?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

F) AML training

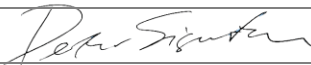
1. Do you provide AML training to relevant employees that includes: a) Identification and reporting of transactions that must be reported to government/authorities? b) Examples of different forms of money laundering involving product and services offered by you? c) Internal policies to prevent money laundering?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Do you retain records of the training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3. Do you communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4. Do you employ 3 rd parties to carry out some of your functions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5. If the answer to question F.4 is "yes", do you provide AML training to relevant 3 rd parties that includes: a) Identification and reporting of transactions that must be reported to government/authorities? b) Examples of different forms of money laundering involving the products and services offered by you? c) internal policies to prevent money laundering	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

SIGNED BY

Name: Pétur Sigurðsson

Title: Compliance Officer

Signature



Date: 8.June 2018

Contact details: compliance@almenn.is