



PAK BRUNEI INVESTMENT COMPANY LIMITED

QUESTIONNAIRE

Know Your Customer, Antimoney Laundering & Counter Terrorist Financing

Know Your Customer Questionnaire

This questionnaire provides all the KYC/AML information about Pak Brunei Investment Company which can be required by any correspondent financial institution. Correspondent Institutions are also requested to fill and submit the same questionnaire available on our website.

Section I – General Information

1	Legal Name Of Institution:	Pak Brunei Investment Company Limited
2	Principal Place Of Business (Address):	Horizon Vista, Comm -10, Block No. 4, Scheme No. 5 Clifton, Karachi, Pakistan
3	Corporate Legal Form:	Public Limited (unlisted)
4	Date Of Establishment:	28-Nov-06
5	Registration Number	0058649
6	Name of Local Licensing Authority And Regulator:	State Bank of Pakistan
7	Is there any Regulatory Authority for Supervision of your Institution?	State Bank of Pakistan
8	Banking License No:	Permission notified by SBP vide Letter dated Aug 20, 2007 under section 13 (1)(a) of Banking Companies Ordinance
9	Taxation Identification No:	2866099-4
10	External Auditor:	Yousuf Adil, Chartered Accountants
11	Official Website Address:	www.pakbrunei.com.pk

Section II – Non Shell Bank Arrangements

1	Institution is not a Shell Bank*	<input checked="" type="checkbox"/>
2	Institution does not maintain accounts for Shell Banks and does not conduct business with Shell Banks.	<input checked="" type="checkbox"/>

* Shell Bank means a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated financial group (cf. FATF Forty Recommendations).

Section III – Ownership and Management Information

1	Please indicate Stock Exchange Name(s) & Symbol(s) on which shares are traded:		
	Unlisted Public Limited Company		
2	Please list the names of all owners** in the table below and their ownership interest (add further rows if necessary):		
	Name and Domicile	Ownership interest (%)	Nature of ownership (direct/indirect)
	Ministry of Finance, Government of Pakistan	49.99933	Direct
	Secretary Economic Affairs Division, Government of Pakistan	0.00067	Direct
	Brunei Investment Agency, Brunei Darussalam	50.00000	Direct

** An "owner" is any person or legal entity that; directly or indirectly; owns or control any class of securities or other voting interests in the Institution.

3	Have there been any significant changes in ownership over the last five years? If yes, please provide details:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
4	Are there any Politically Exposed Persons*** among your Institution's ownership structure and executive management?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

*** Politically Exposed Persons (PEPs) are individuals who are or have been entrusted with prominent public function, for example Heads 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 or more junior individuals in the foregoing categories (FATF Recommendations).

Section IV – Business Activity

1	Please provide the principal types of Business Activity	
	a	Short, Medium & Long Term Debt
	b	Financial Advisory Services
	c	Structured and Project Finance
	d	Underwriting/Guarantees
	e	Equity Placements and Capital Market Operations

Anti-Money Laundering Questionnaire

Section I - General AML Policies, Practices and Procedures:

1	Does the AML Program require approval of the Financial Institution's Board or a senior committee thereof? (Please see the explanation provided at the end of questionnaire)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2	Does the FI have a legal and regulatory compliance program that 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3	Has the FI 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4	In addition to inspections by the government supervisors/regulators, does the FI Customer have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5	Does the FI have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
6	Does the FI have appropriate record retention procedures pursuant to applicable laws?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
7	Does the FI 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?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

8	Does your institution provide training to employees regarding KYC/AML/CTF?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
9	Is the FI fully compliant with the FATF recommendations?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
Section II - Risk Assessment			
10	Does the FI have a risk focused assessment of its customer base and transactions of its customers?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
11	Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
Section III - Know Your Customer, Due Diligence and Enhanced Due Diligence			
12	Has the FI 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)?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
13	Does the FI have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
14	Does the FI collect information and assess its FI customers' AML policies or practices?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
15	Does the FI conduct screening of its customers ?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
16	Does the FI have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
17	Does the FI take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers? (Please see the explanation provided at the end of questionnaire)	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
Section IV - Reportable Transactions and Prevention & Detection of Transactions with Illegally Obtained Funds			
18	Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
19	Does the FI have policies or practices to identify transactions structured to avoid large cash reporting requirements? (Please see the explanation provided at the end of questionnaire)	<input type="checkbox"/> ot Applicable	
20	Does the FI have policies or practices to 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?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
21	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?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
22	Does your company Prohibit conduct services with sanction Countries	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
23	Does your KYC Program require you to assess ML/TL risk at customer Level	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
24	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that properly licensed? (Please see the explanation provided at the end of questionnaire)	<input type="checkbox"/> ot Applicable	
Section V. Transaction Monitoring			
25	Does the FI have a monitoring program for suspicious or unusual activity that covers funds transfers and monetary instruments (such as travellers checks, money orders, etc.)? (Please see the explanation provided at the end of questionnaire)	<input type="checkbox"/> ot Applicable	
Section VI. AML Training			
26	Does the FI 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?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
27	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
28	Does the FI have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> es	<input type="checkbox"/> o
29	Does the FI employ agents to carry out some of the AML 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?	<input type="checkbox"/> ot Applicable	
I hereby confirm that the statements given above are true and correct. I also confirm that I am authorized to complete this document.			
The filled questionnaire should be read in conjunction with the information given below			S. Askary H. Rizvi, Head Compliance
Date:	June 8, 2023		
Official Contact Address:	Horizon Vista, Comm -10, Block No. 4, Scheme No. 5 Clifton, Karachi, Pakistan		
Telephone No(s):	(+92-21) 35361215-19,38771584		
E-mail Address:	info@pakbrunei.com.pk		
IMPORTANT INFORMATION & EXPLANATION			
Pak Brunei Investment Company Ltd (PBIC) operates from its head office in Karachi and has an SME branch/business location in Lahore. Further, PBIC does not mobilize deposits from general public and does not maintain checking accounts. In addition, PBIC does not deal in foreign exchange. In view of foregoing, our AML/KYC risk is more limited compared to commercial banks which conduct aforesaid activities.			
Explanation regarding some of the questions is given below:			
No. 1: PBIC has a Compliance Policy and a Customer Due Diligence & Antimoney Laundering Policy which have been approved by the Board of Directors. Under the Policies, a Compliance Program interalia covering AML measures has been approved by the Managing Director.			
No. 17 & 19: However, At PBIC as we do not mobilize deposits from general public and don't maintain checking accounts.			
No.24: Not applicable on PBIC, as we do not undertake trade related business where we need to have correspondent banking relationship with banks in foreign countries.			
No.22: Not applicable on PBIC, as we do not deal in Funds Transfer and Monetary Instruments (Travellers Checks, Money Orders).			
No.29: Compliance function is not outsourced			