

Sanctions exposure questionnaire

Please complete this questionnaire to help us understand the nature and extent of your organisation's activities in sanctioned countries or with sanctioned individuals. We recognise the following public bodies who impose financial sanctions on countries, individuals, and entities:

- Office of Financial Sanctions Implementation (OFSI) – UK
- Office of Foreign Asset Control (OFAC) – USA
- Council of the European Union (EU)
- United Nations (UN)

Additional notes and guidance

If you have any questions or need any help, please email us at cafbank@cafonline.org or call us on **03000 123 456**.

You can find below links to further guidance on sanctions and Charity Commission's compliance toolkit:

- UK sanctions regimes – <https://www.gov.uk/government/collections/uk-sanctions-regimes-under-the-sanctions-act>
- UK sanctions guidance – <https://www.gov.uk/government/publications/financial-sanctions-faqs>
- US sanctions regimes – <https://ofac.treasury.gov/sanctions-programs-and-country-information>
- EU sanctions regimes – <https://sanctionsmap.eu/#/main>
- Protecting charities from harm: Compliance toolkit - <https://www.gov.uk/government/collections/protecting-charities-from-harm-compliance-toolkit>

There is an additional page at the end of the questionnaire that you can use, to expand upon any answers given.

Your organisation name

1. How does your organisation take steps to mitigate against financial crimes such as: terrorist financing, corruption or laundering of the proceeds of crime and sanctions compliance?

The UK Charity Commission outlines further guidance on this within their compliance toolkit that is signposted above.

Questions to consider are:

- Which relevant policies and procedures do you have in place?
- Do you review any specific sanctions lists?

2. Do you obtain expert advice on complying with sanctions?

Questions to consider are:

- *How often is expert advice solicited?*
- *Is the advisor an internal or external individual or entity?*
- *How have you considered if the advisor has sufficient experience and expertise in this area?*

3a. Does your organisation screen the names of people you deal with, e.g. partner organisations, contractors, beneficiaries?

If your organisation does conduct sanctions' screening, please answer the following questions:

- *Is this screening conducted manually or automatically?*
- *Which specific lists do you screen against?*
- *Who is screened? For example, individuals who may be paid by or pay your organisation as part of a new contract, potential partners, contractors, financial institutions and any other relevant individuals or entities within your supply chain.*

3b. If you have answered yes to Question 3a, will you use CAF Bank for any transactions with those mentioned above?

Please provide further information on how our products will or will not be used.

4. Do you require any licences to undertake activity in any sanctioned countries, or to conduct activities with an individual, entity or organisation who is named on a sanctions list?

Please provide details and a copy of the licences. Where there is no licence, please provide an explanation as to how these activities are carried out.

Organisation and their connected parties

This section of the questionnaire asks for further details of your organisation's connected parties. Connected parties include, but are not limited to, beneficial owners, key controllers, trustees, settlors/grantors/founders, protectors and beneficiaries.

5. Do the connected parties have any current presence in any of the following countries?

Presence means where an entity or individual has its registered office address, business address, correspondence address or principal place of operations. If you have ticked any of the below territories, please provide further information on the additional page provided.

- | | | |
|--|--------------------------------------|---|
| <input type="checkbox"/> Cuba | <input type="checkbox"/> North Korea | <input type="checkbox"/> Syria |
| <input type="checkbox"/> Crimea region of Ukraine | <input type="checkbox"/> Russia | <input type="checkbox"/> Venezuela |
| <input type="checkbox"/> Donetsk region of Ukraine | <input type="checkbox"/> Sevastopol | <input type="checkbox"/> Zaporizhzhia region of Ukraine |
| <input type="checkbox"/> Iran | <input type="checkbox"/> South Sudan | |
| <input type="checkbox"/> Luhansk region of Ukraine | <input type="checkbox"/> Sudan | |

Business activities

This section of the questionnaire asks for further details of your organisation's business activities, systems and controls that you have in place. Business activity includes operations, beneficiaries, donors, shipping, and interactions with government-owned entities.

6. Does your organisation currently carry out or plan to carry out any activities with an individual, entity or organisation who is named on a sanctions list?

If your organisation does, please provide the following information:

- *Details of activities currently undertaken or those planned*
- *Details of the sanctioned individuals or entity – name, location, relationship to the entity and which sanctions list they appear on*

7a. Do you have any current or planned activities involving any of the following sanction targeted countries?

If you do, please expand your answers on the additional page provided.

Comprehensively sanctioned countries

These countries are subject to complex and/or wide-ranging sanctions.

- | | | | |
|--------------------------------------|--|--------------------------------------|------------------------------------|
| <input type="checkbox"/> Afghanistan | <input type="checkbox"/> Libya | <input type="checkbox"/> South Sudan | <input type="checkbox"/> Venezuela |
| <input type="checkbox"/> Belarus | <input type="checkbox"/> Myanmar (Burma) | <input type="checkbox"/> Sudan | <input type="checkbox"/> Yemen |
| <input type="checkbox"/> Cuba | <input type="checkbox"/> Palestine | <input type="checkbox"/> Syria | |
| <input type="checkbox"/> Iraq | <input type="checkbox"/> Russia | <input type="checkbox"/> Ukraine | |

Non-comprehensively sanctioned countries

For the following jurisdictions, sanctions can target individuals, entities and governments (designated parties) and/or trade with them.

- | | | | |
|---|--|------------------------------------|------------------------------------|
| <input type="checkbox"/> Bosnia and Herzegovina | <input type="checkbox"/> Eritrea | <input type="checkbox"/> Haiti | <input type="checkbox"/> Nicaragua |
| <input type="checkbox"/> Burundi | <input type="checkbox"/> Ethiopia | <input type="checkbox"/> Hong Kong | <input type="checkbox"/> Somalia |
| <input type="checkbox"/> Central African Republic | <input type="checkbox"/> Guatemala | <input type="checkbox"/> Lebanon | <input type="checkbox"/> Tunisia |
| <input type="checkbox"/> China | <input type="checkbox"/> Guinea | <input type="checkbox"/> Mali | <input type="checkbox"/> Turkey |
| <input type="checkbox"/> Democratic Republic of The Congo | <input type="checkbox"/> Guinea-Bissau | <input type="checkbox"/> Moldova | <input type="checkbox"/> Zimbabwe |

7b. If you ticked any territory in Q7a, please provide details of the activities in each sanction targeted country and the percentage of your organisation's total annual activity this represents. Please also provide supporting evidence.

Total percentage of activity refers to the proportion (%) of expenditure, profit and/or annual income of the organisation.

Additional information page

Please use this space to expand on any of your answers or to provide any further information you would like us to share with us concerning your organisation's systems and controls.

Declaration

To be completed and signed by a formal official of the organisation.

My organisation is fully committed to the fight against financial crime, including sanctions compliance and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it undertakes activity.

By printing my name below, I confirm that the answers provided in this questionnaire are correct to the best of my knowledge and that I am authorised to make this declaration on behalf of the organisation.

Print name	
Position in organisation	
Authorised signature	Date d d m m y y y y

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Please email your completed form to us at CAFBankKYC@cafonline.org or post it to:

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