



**TROPICAL BANK LIMITED:
Due Diligence Questionnaire
V.2.0**

Tropical Bank Limited Banks / Partners

Due Diligence Questionnaire (Counterparties and other Business Partners).

Tropical Bank Limited (TBL) is a commercial Bank in Uganda, established in 1973 as the Arab Libyan Bank for Foreign Trade & Development. However, in 1994, the name was changed to Tropical Africa Bank Limited and re-branded in 2006 to Tropical Bank Limited.

Tropical Bank is jointly owned by the Governments of the Republic of Uganda (0.65%) and the Libyan Foreign Bank (LFB) with 99.35% of Paid-up capital. The bank has a wider reach through its affiliation with the Libyan Foreign Bank Group which has a network of about 45 participations in banks and companies spread in 28 countries.

The Bank maintains its headquarters and main branch in the Central Business Centre of Uganda, at Plot 27, Kampala Road, Uganda. Tropical Bank operates with 8 branches, and a network of Agents, correspondents and relationships throughout the globe. The branches include; Kampala Road – Main branch, Oasis Mall, Kawempe, Ntinda, Mukono, Masaka, Jinja and Kakira Branch.

Risk management is top priority to Tropical Bank Limited and we are committed to ensuring that all clients operate in a safe and legal manner that is consistent with obligations in the applicable agreements and other program documents governing the operation of client relationships.

Tropical Bank Limited is obligated to ensure that clients have appropriate processes and controls are in place for regulatory compliance, fraud prevention, business continuity planning/disaster recovery, physical and data security.

Therefore, before commencement of the business relationship, Tropical Bank requires its clients/ business partners to complete and return the following materials:

- A completed and signed copy (in either electronic or hardcopy format) of the attached questionnaire in [Annexure A](#)
- An attestation letter reproduced on the bank's letter head and signed by the chief compliance officer. See sample in [Annexure B](#)

Existing clients must respond to this request within 30 business days. Note that the completion and submission of this information may not constitute one completed review/examination, as clients are subjected to further discussion or an on-site visit, if deemed necessary, altogether which is considered one complete review/examination.

All documents must be submitted/ returned to

Legal & Compliance department,

Email: amlunit@trobank.com

Copy: basuman@trobank.com

Tropical Bank Limited

Plot 27 Kampala Road, Uganda.

Annexure A

CONTACT INFORMATION

Name of Partner:

Operating Name(s), if Different:

Website Address Used for Operation

Registered Head Office Address:

Date of Incorporation:

Registration / Incorporation Number:

Please provide your Compliance / Risk Representative's information below:

Name:

Title:

Telephone Number:

Contact E-mail:

Instructions:

Please provide the appropriate "Response" for each question below. If you answer "No" to any of the questions, please provide a brief explanation with the reason and/or a description of the actions taken to comply with the requirement.

CORPORATE INFORMATION

QUESTIONS	RESPONSE
<p>1. You are:</p> <p>Note:</p> <p>i. For privately held entities, please provide Certified True Copy of all incorporation documents reflecting the ownership structure, the Board Composition and Management structure of your organization,</p>	<p><input type="checkbox"/> Publicly Held <u>or</u> a subsidiary of a Publicly Held Entity</p> <p>On what stock market(s) are you traded?</p> <p>If you are a subsidiary, please identify all direct and indirect parent entities:</p> <p><input type="checkbox"/> Privately Held or a subsidiary of a Privately Held Entity</p> <p>If you are a subsidiary, please identify all direct and indirect parent entities:</p>

<p>corporate chart reflecting parent and all subsidiary and affiliate relationships.</p> <p>ii. For companies dealing in ICT products and services, please provide proof of certification from NITA-U.</p> <p>iii. For Fintech and Money Remittance companies, please license from NPSD.</p>										
<p>2. Are you a Financial Institution, Non-Bank Financial Institution (NBFI), Non-Financial Business (NFB), Fintech, Trust and Company Service Provider (TCSP), Professional Intermediary and Professional Service Provider (PSP) regulated by a government authority?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please list all your regulators:</p> <p>If No (Please Explain):</p>									
<p>3. Please identify all Ultimate Beneficial owners (Natural persons with interest and final control).</p> <p>Note: Attach passport/ ID Copies and proof of residential addresses for Ultimate beneficial Owners.</p>	Full Name	NIN/passport details	Nationality	Date of birth [dd/mm/yyyy]	Addresses	Postal address	Current email address	Current telephone number	Occupation	
*Provide separate listing if additional space is required.										
<p>4. Please provide list of Board of Directors</p>	First	Middle	Last Name	Title	Country of Origin					
* Provide separate listing if additional space is required.										
<p>5. Please provide details of your top management employees.</p>	First	Middle	Last Name	Title	Country of Origin					
* Provide separate listing if additional space is required.										
<p>6. Do you have policies to reasonably ensure that you will not conduct transactions with or on behalf of Shell companies or organizations</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(If No, please explain)</p>									

<p>through any of its accounts or products? (A shell company is a company incorporated in a jurisdiction in which it has no physical presence, and which is unaffiliated with a regulated financial group.)</p>	
<p>7. Are you or any of your shareholders, Ultimate Beneficial Owners (natural persons with interest and final control) located in or operating under a license issued by Cuba, Myanmar (Burma), Iran, North Korea, Sudan or Syria?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(If Yes, please explain)</p>
<p>8. Have there been in the recent past, or are you planning in the near future (to the extent you are not prohibited from disclosing such information), any changes to your organizational structure (e.g. mergers, acquisitions, partnerships)?</p> <p>Note: If you are planning any changes to your organizational structure, please describe the changes.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please describe the changes affecting the party to the Acquirer Agreement and provide effective dates:</p>

DUE DILIGENCE

ANTI-MONEY LAUNDERING, PREVENTION OF TERRORIST FINANCING & PROLIFERATION FINANCING

QUESTIONS	ANSWERS
<p>1. Do you maintain a written Policy or Program approved by your board of directors to ensure compliance with all legal and regulatory obligations relating to the prevention of money laundering and terrorist financing?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If Yes, when was this Policy / Program last approved?</p> <p>If No, please provide an explanation:</p>
<p>2. Do you periodically review your AML/CFT Policy?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If Yes, specify the frequency</p> <p>If no, please provide an explanation:</p>

<p>3. Do you have a training program relating to the prevention of money laundering and terrorist financing for NEW and EXISTING employees?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please briefly summarize your training program.</p> <p>Please indicate the frequency.</p> <p>If No, please provide an explanation.</p>
<p>4. Are independent reviews (internal or external) of your Institution's compliance with legal and regulatory obligations relating to the prevention of money laundering and terrorist financing performed?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please indicate who performs these reviews.</p> <p>Please indicate the frequency of these reviews.</p> <p>If no independent review of your compliance is performed, please provide further explanation as to why not.</p>
<p>5. Do you have systems and controls in place to monitor and identify suspicious or unusual activities?</p> <p>If yes, how often are monitoring rules/parameters calibrated?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please provide a detailed description of these controls.</p> <p>If No, please provide further explanation as to why not.</p>
<p>6. What actions do you take once you have identified suspicious or unusual activities, (including whether any reports are filed with law enforcement or any regulatory body)?</p>	
<p>7. Has your Institution been subject to any penalties or enforcement actions (or comparable) in connection with the legal/regulatory requirements relating to AML, terrorist financing prevention and proliferation financing in the past five years?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If Yes, please clarify and provide corrective measures implemented</p>
<p>8. Do you consistently pass regulator's Audit on your compliance to its policies and regulations on Money Laundering, Terrorist Financing and Proliferation financing?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If No, please clarify</p> <p>Please provide a greater explanation of the non-conformities detected and corrective action or actions you have in place.</p>
<p>9. Do you screen all transactions that are performed by your customers against the limits specified by the regulator for domestic, cross border transactions as may be relevant and do you report any suspicious transaction in the manner specified by the Regulator or any relevant Law?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If No, please clarify</p>
<p>10. Do you enforce all transaction limits by appropriate systems and possibly, electronic intelligence to ensure that customer limits contravene any regulation?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>If No, please clarify</p>

<p>11. Do you monitor all transaction components or parties to alert any interaction or involvement with blacklisted / flagged countries based on an agreed list?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>12. Do you monitor, report and treat transactions emanating from countries or individuals on the Sanctions list (i.e. UN, EU, Office of Foreign Assets Control SDN List and its domestic equivalent) in an appropriate manner?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>13. Do you have appropriate record retention procedures?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>14. Do you have systems in place to ensure compliance with the reporting requirements as contained in the Anti-Money Laundering Act 2013 (as amended), Anti-Money Laundering Regulations 2015 (as amended) and the Anti-Terrorism Act 2002 (as amended), Anti-Terrorism Regulations 2023?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>15. Do you have systems in place to identify whether customers dealing in import and export of dual-use goods, technology or expertise do not facilitate Proliferation financing?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>16. Do you monitor transactions that involve wire transfers and cross-border payments?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>17. If yes, are steps taken to establish whether the parties involved are not front entities, shell companies, established purposely to facilitate trade-based money laundering?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable If No, please clarify</p>
<p>18. “Know Your Customer” Do you perform KYC in the manner prescribed by your Regulator, Parent Institution or your own Policies?</p>	
<p>a. Please describe your Due Diligence procedure.</p>	
<p>b. Please describe how this information is verified.</p>	
<p>c. Please describe enhanced due diligence performed on high-risk Customers.</p>	

d. Please describe any periodic or ongoing due diligence performed on High Risk customers including how you ensure information is up-to-date and verified for existing relationships.	
e. If you intend to have a procedure or program in place, please provide when you intend to publish the program.	
f. Do you have policies covering relationships with Politically Exposed Persons (PEPs)?	
g. If yes, what mechanisms do you use to classify PEPs in active politics and those that have existed?	
h. Is anyone within your organization's shareholding structure, Directors, management, employees or Ultimate Beneficial Owner a Politically Exposed Person (PEP); close associate or related party?	
i. Do you maintain relationships with customers that deal in virtual currencies, remote transactions and other Non-face to face business relationships?	
j. If yes, please describe your Due Diligence procedure for the above segments.	
k. Do you maintain and keep the following documents? <ul style="list-style-type: none"> • Customer Records • Customer Verification • Customer Screenings against UN, EU, OFAC and other sanctions lists • Customer monitoring • Independent testing / audit of the program 	

ANTI-BRIBERY & CORUPTION (ABC)

QUESTIONS	ANSWERS
1. Is anyone within your organization's management, employees, Board of Directors, subsidiaries, or affiliates a "government official"?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please indicate the name of the person and describe their association with your organization:

<p>A “government official” is defined as any representative of</p> <ul style="list-style-type: none"> i. Any government or government-owned or controlled entity; ii. Any government department, agency or instrumentality at any level of government; iii. Any entity that is wholly or partly owned or controlled by a government or government entity or instrumentality (not withstanding that the company may be publicly listed); iv. Any public international or supra-national organization such as the United Nations, the World Bank or similar organization 	
<p>2. Is your equity owned or controlled by a natural person or entity that meets any of the following definitions:</p> <ul style="list-style-type: none"> • The government (including government agencies, government organizations, government officers or employees) OR • Several government bodies (e.g., when government holdings are divided into several blocks of shares controlled by different agencies) OR • An organization (i.e. company, fund or trust) controlled by the government OR • Several organizations that are ultimately controlled by the government through Equity or creature of statute. 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, identify the name of the entity or individual and percentage of ownership:</p>
<p>3. Do any of the following individuals stand to benefit in any way by your prospective agreement with us?</p> <ul style="list-style-type: none"> • an officer or employee of a government, or an agency, ministry of instrumentality thereof; • an officer or employee of a government-owned or –controlled entity; • an officer or employee of a public international organization; 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, please provide the name of the individual, the officer title and description of the way in which this individual will benefit from the proposed agreement:</p>

<ul style="list-style-type: none"> • an officer, employee or official of a political party; • candidate for an elected, appointed public office 	
<p>4. Does the government (direct or through an appointed agency or organization) have:</p> <ul style="list-style-type: none"> • Special voting (veto) rights with you (e.g. those known in some countries as “golden shares”) OR • A substantially similar arrangement 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p>
<p>5. Do any of your owners, partners, major shareholders, directors or officers:</p> <ul style="list-style-type: none"> • Currently hold any position with or perform duties for any government, military, public international organization or any agency, branch or affiliate thereof? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide the individual’s name, government position, name of the government agency for which they perform any duties and the description of those duties:</p>

Data Protection and Privacy

QUESTIONS	ANSWERS
<p>1. Is your company or organization registered with the Personal Data Protection Office (PDPO) of Uganda or any other country?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide a copy of the registration certificate.</p>
<p>2. Do your organization have a Data Protection and privacy Program?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please briefly describe your data protection and privacy framework</p>
<p>3. Has your organization formally appointed a Data Protection Officer (DPO)?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, describe the reporting line of the DPO</p>
<p>4. Does the DPO provide regular updates to senior management about data protection and privacy compliance of the organization?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, what is the reporting frequency</p>
<p>5. Has your organization developed end-to-end Policies and Procedures on data Protection and privacy?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>6. Do your organization implement procedures that recognize and respond to individuals' complaints about data protection, and individuals are made aware of their right to complaints.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>7. Do your organization implement procedures to review the privacy information provided to individuals regularly to make sure that it is accurate, up-to-date and effective?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>8. Do your organization adequately train all staff likely to make decisions about data privacy, data sharing, and makes them aware of their responsibilities?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, How often are staff trained</p>

9. Do your organization have an appropriate retention schedule outlining storage periods for all personal data, which you review regularly?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, what is your records retention period
---	---

Foreign Account Compliance Act (FATCA) & Common Reporting Standards (CSR)

QUESTIONS	ANSWERS
1. Is your organization FATCA registered with IRS?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please provide details of your GIIN: If no, please describe alternative means used to file FATCA forms
2. Do any of your ultimate beneficial owner, shareholder, Director or officers, customers: <ul style="list-style-type: none"> • Affiliated to the US either by citizen or resident (green card), birth, home or mailing address, US telephone number, power of attorney granted to someone with a US address, standing order, 10% shareholders with US indicia, or entity formed in the US? • Filed FATCA forms to Internal Revenue Authority (IRS) or through another institution? 	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please specify the number and the nature of US indicia:
3. Do you have clients that failed to provide FATCA forms or availed incorrect FATCA forms (recalcitrant clients)?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, has the organization reported search customers :
4. Do the organization withhold 30% tax charge on clients that are not FATCA compliant?	
5. Do your organization train relevant staff about FATCA requirements and are aware of their responsibilities in respect to this Act?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Do your organization conduct self-certification with FATCA after every 2 years to ensure that there are sufficient controls and mechanisms in place to comply with FATCA requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Has your organization developed a FATCA policy and other frameworks to comply with the common reporting standards (CSR) in order to evade tax evasion and double taxation?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Environmental, Social and Governance (ESG)

QUESTIONS	ANSWERS
1. Does any of the organization's financial Product, service on offer or business activity contradict with the environmental, social and governance	Yes No If Yes, please mention these products, services or business activities:

criteria which can increasing pressure on the environment?	
2. Do you have tools and systems to monitor, report and treat issues emanating from E&S concerns in the said products and services and implement associated policies, and reporting to the board.	Yes No If yes, please mention some of the systems in place:
3. Has your Institution been subject to any penalties or enforcement actions (or comparable) in connection with the legal/regulatory requirements relating to Environment and social (E&S) concerns.	Yes No If Yes, please clarify and provide corrective measures implemented
4. Are there any decisions made or ongoing arrangements at strategic level in the areas of corporate governance that contradict E&S concerns?	Yes No If Yes, please provide details of the affected products, services, society or scope of the affected environment:
5. Are independent reviews (internal or external) of your organization's compliance with legal and regulatory obligations relating to E&S?	Yes No Not Applicable Please indicate who performs these reviews. Please indicate the frequency of these reviews. If no independent review of your compliance is performed, please provide further explanation as to why not.

The summaries of the information described above are complete and accurate as of the date we receive your response. You may be requested to make the results of independent audits of the operation of your compliance programs available to us for review upon request and such requests shall be excluded from any limitations on the audits that we may conduct once an agreement has been entered under the terms of the agreement or the applicable program documents. We may audit your responses and processes described herein as set forth in the agreement and program documents.

Official Signature

(Signature of Company Officer)

(Date)

(Print Name of Company Officer)

(Title)

Annexure B

SAMPLE ATTESTATION OF COMPLIANCE LETTER

Date:

The Managing Director
Tropical Bank Limited
Plot 27, Kampala Road,
Kampala (Uganda)

Dear Sir, Madam,

ATTESTATION OF COMPLIANCE.

We hereby attest that (*name of institution*) a participant of (*reason for the business relationship*) complies with all laws, regulations or governmental and legislative policies of the (*country*) and any other similar laws on Financial Crime in the jurisdictions in which your network operate for the period of ____(*Month*) ____(*Year*) to ____(*Month*) ____(*Year*). We further warrant to you that we are in constant compliance with the provisions of relevant laws on Anti-Money Laundering, Know Your Customer, Anti-Bribery, Anti-Terrorist Financing/ Sanctions, Anti- Proliferation financing and Data Protection and Privacy Laws. We also further confirm that our products, services and business activities confirm to the ESG standards and efforts are always made always to conserve a sustainable green environment.

We warrant to always inform you by way of written notice if we breach any provision of the law or any requirements as it applies to above laws and standards.

We further attest to the fact that we shall maintain continuous compliance to all laws, regulations, or governmental or legislative policies on financial crimes, Data Protection and Privacy and ESG sustainability standards. We will not participate in or allow our assets to be used for any act or inaction that will be in breach of laws, regulations, or policies on financial crime, Data Protection and Privacy and ESG standards.

We, by this attestation letter understand that Tropical Bank Limited has the unhindered right to monitor transactions that occur across our network for Money Laundering, Bribery, Terrorist Financing and Sanctions, Data Protection & Privacy breaches and violation of ESG sustainability standards.

We further acknowledge that Tropical Bank Limited is not obligated to monitor transactions in the manner above and we will not hold Tropical Bank Limited liable for any loss, claims, penalties or sanctions that may arise from Tropical Bank Limited's action or inaction regarding transaction monitoring as stated above.

We warrant reporting any incidence of non-compliance to or breach of any law, regulation, or policies on financial crime, Data Protection and Privacy and ESG sustainability standards.

We by this letter indemnify you and discharge you, your shareholders, management, staff, partners, agents and associate from any liability that may arise because of any breach or violation on our part of any law, regulation or governmental policies.

Yours faithfully

On behalf of (*state name of institution/ Individual business Partner*)

Name:

Designation (Head/ Chief Compliance Officer

Sign: