



Financial Institution Name:

Israel Discount Bank of New York

Location (Country) :

United States of America

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Israel Discount Bank of New York ("IDB Bank")
2	Append a list of branches which are covered by this questionnaire	Staten Island and Brooklyn, NY; Short Hills, NJ; Beverly Hills and Downtown Los Angeles California; Aventura, Florida. A loan production office on Long Island, New York. The Bank also maintains an International Private Banking Facility at its main office; and representative offices in Chile, Israel and Uruguay
3	Full Legal (Registered) Address	511 Fifth Avenue, New York, NY 10017
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	May 9, 1979
6	Select type of ownership and append an ownership chart if available	IDBNY is 100% owned by Discount Bank Group, Ltd., which is owned by Israel Discount Bank, Ltd.
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	IDB Ltd. is publicly traded on the Tel Aviv Stock Exchange (Ticker Symbol - ISDAY)
6 b	Member Owned / Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	No
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	Yes
9 b	Cash Reporting	Yes
9 c	CDD	Yes
9 d	EDD	Yes
9 e	Beneficial Ownership	Yes
9 f	Independent Testing	Yes
9 g	Periodic Review	Yes
9 h	Policies and Procedures	Yes
9 i	Risk Assessment	Yes
9 j	Sanctions	Yes
9 k	PEP Screening	Yes
9 l	Adverse Information Screening	Yes
9 m	Suspicious Activity Reporting	Yes
9 n	Training and Education	Yes
9 o	Transaction Monitoring	Yes
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
11a	If Y, provide further details	
3. ANTI BRIBERY & CORRUPTION		
12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	Yes
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
14	Does the Entity provide mandatory ABC training to:	
14 a	Board and Senior Committee Management	Yes
14 b	1st Line of Defence	Yes
14 c	2nd Line of Defence	Yes
14 d	3rd Line of Defence	Yes
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
14 f	Non-employed workers as appropriate (contractors / consultants)	Not Applicable

4. POLICIES & PROCEDURES		
15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a	Money laundering	Yes
15 b	Terrorist financing	Yes
15 c	Sanctions violations	Yes
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	Yes
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
16 d	Prohibit accounts / relationships with shell banks	Yes
16 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
16 g	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
16 h	Assess the risks of relationships with PEPs, including their family and close associates	Yes
16 i	Define escalation processes for financial crime risk issues	Yes
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	Yes
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	Yes
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
18	Does the Entity have a record retention procedures that comply with applicable laws?	Yes
18 a	If Y, what is the retention period?	5 years or more

5. KYC, CDD and EDD		
19	Does the Entity verify the identity of the customer?	Yes
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	Yes
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	Yes
21 b	Customer identification	Yes
21 c	Expected activity	Yes
21 d	Nature of business / employment	Yes
21 e	Product usage	Yes
21 f	Purpose and nature of relationship	Yes
21 g	Source of funds	Yes
21 h	Source of wealth	Yes
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	Yes
22 a1	Are ultimate beneficial owners verified?	Yes
22 b	Authorised signatories (where applicable)	Yes
22 c	Key controllers	Yes
22 d	Other relevant parties	Yes
23	Does the due diligence process result in customers receiving a risk classification?	Yes
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	Yes
26 b	Trigger event	Yes
27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?	
27 a	Non-account customers	Prohibited
27 b	Offshore customers	EDD on a risk based approach

27 c	Shell banks	Prohibited
27 d	MVTS/ MSB customers	EDD on a risk based approach
27 e	PEPs	EDD on a risk based approach
27 f	PEP Related	EDD on a risk based approach
27 g	PEP Close Associate	EDD on a risk based approach
27 h	Correspondent Banks	EDD on a risk based approach
27 h1	If EDD or EDD & Restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	Yes
27 i	Arms, defense, military	None of the above
27 j	Atomic power	None of the above
27 k	Extractive industries	None of the above
27 l	Precious metals and stones	EDD on a risk based approach
27 m	Unregulated charities	Prohibited
27 n	Regulated charities	EDD on a risk based approach
27 o	Red light business / Adult entertainment	EDD on a risk based approach
27 p	Non-Government Organisations	EDD on a risk based approach
27 q	Virtual currencies	Prohibited
27 r	Marijuana	Prohibited
27 s	Embassies / Consulates	None of the above
27 t	Gambling	Prohibited
27 u	Payment Service Provider	EDD on a risk based approach
27 v	Other (specify)	
28	If restricted, provide details of the restriction	

6. MONITORING & REPORTING		
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
30	What is the method used by the Entity to monitor transactions for suspicious activities?	
30 a	Automated	
30 b	Manual	
30 c	Combination of automated and manual	Yes
31	Does the Entity have regulatory requirements to report currency transactions?	Yes
31 a	If Y, does the Entity have policies, procedures and processes to comply with currency reporting requirements?	Yes
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	Yes
34 b	Local Regulations	Yes
34 b1	Specify the regulation	FinCEN Bank Secrecy Act (BSA) rule [31 CFR 103.33(g)] aka "Travel Rule"
34 c	If N, explain	

**the
Wolfsberg
Group**

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Location (Country):

United States of America

I, Mark Zilberzweig (Chief Compliance Officer), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of Israel Discount Bank of New York (Bank name).

Mark Zilberzweig

SVP / Chief Compliance Officer

Signature 

Date 8/6/2019