

VENDOR DUE DILIGENCE QUESTIONNAIRE

The following questions are intended to inform First Bank of Nigeria Ltd of the Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) Policies & Procedures implemented by its Third Party Agents/ Vendors as well as their compliance with relevant local and international regulations.

Section 1: Nature of Third-Party Relationship			
1.1	Name:		
	Registered Office:		
	Business Address: (if Different from Registered Office)		
	Date of incorporation:		
	Web address (if any)		
	Registration/Incorporation Number: (Please attach copy of Certificate of Incorporation / Registration)		
	Nature of Business: (if different from incorporation document)		
	List the names and addresses of shareholders with 5% stake or more in the company:		
	Provide the names and addresses of the Directors and Senior Management Staff of the company:		

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	<p>Is any Director or key senior management member politically Exposed Persons "PEP"?</p> <p>If yes, please indicate name(s):</p>		
	<p>List of related entities</p>		
	<p>Does your company have an Internal Control Department/Internal Audit Department?</p>		
	<p>If "yes", Kindly attach the latest Internal Control/ Audit Report</p>		
	<p>Is the Parent or Associate a regulated institution? Yes No</p> <p>If yes, state regulator's name</p>		
	<p>Is there a Certificate of Licensure for your company? If yes, please provide copy</p>		
	<p>Name and address of External Auditors (if any)</p>		
	<p>Aside First Bank, list other institutions you provide services to:</p>		

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	Aside First Bank, which other banks do you have banking relationship with?
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2.	GENERAL POLICIES (ANTI-MONEY LAUNDERING, INTERNAL CONTROL POLICIES, PRACTICES AND PROCEDURES)	YES	NO
2.1	Does your company maintain written Policies and Procedures on (Anti-Money Laundering and Combating to Terrorists Financing and Internal Control policies and procedures?) If yes, (Please provide copies)		
2.2	Do you have in place arrangements for monitoring the following amongst your staff		

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	<ul style="list-style-type: none"> <li>a) Bribery &amp; Corruption Activities</li> <li>b) Giving &amp; Receiving of Gifts from Third Parties</li> <li>c) Conflict of Interest</li> <li>d) Whistle-blowing policy</li> </ul>		
2.3	<p>Does your recruitment process cover:</p> <ul style="list-style-type: none"> <li>a) Employee conduct at time of screening and selection?</li> <li>b) Background Check?</li> </ul>		
2.4	<p>Does your company have a compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis?</p> <p>If yes, what is his/her name</p> <ul style="list-style-type: none"> <li>b) His/her contact detail(s); email address and phone number</li> </ul>		
2.5	Whom does the Compliance Officer report to?		
2.6	Are the company's policies and procedures approved by Board?		
2.7	In addition to examination by the government agencies/regulators, do you have an internal audit function that assesses AML policies and practices on a regular basis?		
2.8	How frequent are the Audits: yearly, half yearly, etc.?		

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	<p>Are independent tests of controls carried out to ensure adherence to these internal control procedures?</p> <p><u>Pls itemise the key procedures followed.</u></p>		
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2.	TRAINING	YES	NO
2.1a	Do your staff have the necessary training and knowledge to carry out the services required by the Bank?		
2.1b	If yes to 2:1a, what is the frequency of training?		
	List the Topics usually covered at such training:		
2.2a	Do your institution/ customers retain records of their training sessions including attendance records and relevant training materials used?		
2.2b	If so, what is the duration?		
2.3	Does the institution have an Anti-Bribery and Corruption Policy in place?		

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3	<b>WORK ETHICS/INFORMATION SECURITY:</b>	
3.1	<b>Adherence to Confidentiality and Privacy Rules:</b>	
	Describe the procedure for enforcing Confidentiality and Privacy rules in your organization?  Are notifications and information obtained by your employees during discharging their responsibilities kept confidential?  State how this is being managed.	
3.2	<b>Safety and Security of Information:</b>	
	Are there adequate security procedures to ensure the safety and security of information, which shall include information obtained during the delivery of services and other privileged information about the Bank?	
	Do the terms of the employees' contract expressly state that they should not employ information acquired in the discharge of their responsibility to their own advantage?	
	Do you share office space with another party/business not related to the services rendered to First bank?	
	If Yes, share the name and business type of the company	
3.3	<b>Business Continuity Program</b>	
	Does your institution have a Business Continuity Management (BCM) policy document that sets out the contingency arrangements to ensure the continuity of the service rendered to the Bank?	
	Does the contingency plan cover plan to mitigate any significant disruption, discontinuity, or gap in service due to staff misconduct	
	Are there alternative disaster recovery centres and archives for retrieval of data/documentation/information in case your main office is inaccessible in situations of emergency, disaster management and force majeure	

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4	<b>SCOPE OF AGREEMENTS</b>	
	Do you have written Agreements/Service Level Agreements with the Bank detailing the scope of services to be rendered?	
	Do you fill any Pre-qualification questionnaire before the process of selection?	
	Provide a brief description of your services indicating procedure	
	Are there plans for innovation and a better electronic approach for carrying out this <u>services</u> ?	
	If yes, share a brief description of your plans	

<b>Authorised Signatory Name</b>	<b>Signature</b>
<b>Designation</b>	<b>Date</b>