

**QUESTIONNAIRE FOR ASSESSMENT OF IMPLEMENTATION
OF INTERNAL RULES AND LAWS**

1. Questionnaire of coordinative institution

A.QUESTIONNAIRE FOR QUALITATIVE ASSESSMENT

I. Corporate governance and role of the board

1. Does the institution have a regulation to anti money laundering and counter financing of terrorism?
2. What is the frequency to renewing the regulations?
3. Does the institution implementing programs anti money laundering and financing of terrorism? If yes, please give more details about your implemented program.
4. Does the AML/CFT program include requirements on risk management and suspicious transaction reports? How you monitoring effective implementation of the program in related units and departments?
5. Has your board of directors appointed compliance officer to combating money laundering and financing of terrorism?
6. Does the board of directors adopts and overseen the reports of AML/CFT programs?
7. How the boards of directors are participating for AML/FT programs? Please give more details about measurements of board of directors.
8. Does the board of directors are cooperating with internal auditing on AML/CFT?
9. Has your organisation implementing ethic code? Is the code includes issues on AML/CFT?
10. Does the institution have a system for monitoring and reporting unusual and suspicious activity? Does the system have a capacity to find suspicious transaction? If yes, please attach statistical analyzes.
11. Does the institution's user database have merging with information system?
12. Does the board of directors adopted and overseen the operation and result of above mentioned system?

II. Regulation: Customer due diligence

1. Has the institution approved regulation on CDD?
2. What is the frequency to renewing or updating the regulations? When are you renewed your regulation?
3. Has the institution introducing renews or updates of regulations to the administration and workers? How do you introducing renewed regulations?

4. Does the institution have conducted below mentioned persons in your AML/FT Regulation? Such as:
 - Resident Person
 - Non Resident Person
 - Legal entity: Company
 - Trust organisation /law and religion/буяны байгууллага
 - Beneficiary owner
 - High risk customers of the list of international organisations Олон улсын байгууллагаас гаргасан жагсаалт (The United Nations List on Terrorism)
 - Politically exposed person
 - Non profit organization
 - Others
5. Does the institution have implementing above mentioned regulation on their branches and subsidiaries?
6. Does the institution have processed your regulation according law on Money Laundering and Terrorism Financing?
7. Does the AML/CFT Regulation included below mentioned requirements?
 - Registration of transaction details/business relationship.
 - Usage of special process on customer due diligence for politically exposed person or high risk customers.
 - Appoint compliance officer under mission to regulate high risk customers and politically exposed person.
 - Update customer's information database
 - Recording and monitoring of transactions and customers
 - Reporting of suspicious transactions to related organizations
8. Does the institution takes below mentioned information about beneficiary owner in case of your customer is accredited representative and intermediary? It includes:
 - Legal relationship and empowerment of power of attorney
 - Information about assets resource of beneficiary owners
 - Reference of the administration or owner of representing company
9. Does the institution include below mentioned requirements for new customers due diligence operation? It includes:
 - Inspection of confirmation documents
 - In person meeting with new customers
 - Provide by information with independent resource
 - Close inspection for customers who related with high risk business or high risk countries
 - As a company, take information on prospective transaction, financial reports, location and their business
10. What types of customers does the institution refuse to do business with? Why?
11. Does the institution taking below mentioned information on resource of their cash from the customer during their transaction? It includes:
 - Resource information /name and address of natural and legal person /
 - Amount of transfer
 - Date of transfer
 - Payment guidance

- Reference of receiver bank
- Name and address of receiver
- Transfer purpose

III. Risk management

1. Does the institution have a unit or department to implement risk management? Does the risk management include risk issues on money laundering and financing of terrorism?
2. Does the institution have making risk assessment on money laundering and financing of terrorism? If yes, what is the assessment range and frequency? How the institution makes assessment?
3. Does the institution have a risk classification system for money laundering and financing of terrorism? If yes, please provide more details about this system.
4. Does the institution classify high risk customers or products? How classifying?
5. Does the institution take into account ML/FT risks in approving expansion of business e.g. new branches and markets (domestic and foreign)? If so who participates in the assessment of such risks?
6. If your institution introducing new product or service, how the institution assess risk of money laundering and financing of terrorism? Does have any regulation or policy on this situation? How the institution making risk assessment?
7. Does your institution reporting about risk of money laundering and terrorism financing for board of directors and higher organizations? How reporting?

IV. Domestic supervision, internal and external auditing

1. Does the institution have an Internal Audit/Department function? Does it review and test the AML/CFT program, policies and procedures and in particular those related CDD, STR and record keeping? Is there a specific AML/CFT audit plan?
2. If the institution supervising operations on AML/CFT, how frequent is the supervision conducted? When was the last time interval audit review AML/CFT? Please provide more details on last assessment, inspection range and results.
3. How many employees in internal audit unit? How much time is your unit spending for operations for AML/CFT?
4. Please determine your internal auditing inspection and reporting system. Who receiving this report and these reports included issues on ML/CF?
5. Does the external auditor's review of the internal control environment cover AML/FT controls? If yes, please provide result of this external auditing.

V. Compliance

1. Has the institution appointed an AML/CFT compliance officer? If so provide the name, functions, position and major skills.
2. Does the compliance officer carry on duties other than AML/CFT? If so, what other functions and what proportion of time is devoted to AML/CFT?
3. To whom does the compliance officer report and how often?

4. Please provide abstract result of compliance officer's last report on money laundering and financing of terrorism.
5. Describe the role of the AML/CFT compliance officer in (a) monitoring and reporting of suspicious activities; (b) training; (c) development of risk management systems and controls, (d) reporting breaches of established policies and procedures with regard to AML/CFT to senior management.

VI. Training and human resource

1. Does the institution have training on AML/CFT for employees?
2. Please specify frequency of training provided. When was the last training program delivered?
3. Who are required to participate the AML/CFT training? How the institution delivering training for new employee?
4. Has the institution board adopted a formal training program for AML/CFT? Please provide brief details about training.
5. How much the training budget of last year for AML/CFT and current year?

VII. Reporting and records of registration?

1. Does the institution have a system for monitoring and reporting unusual and suspicious activity? How, manually or automated?
2. Does the institution have a system for monitoring and reporting unusual and suspicious activity on a group-wide basis from branches and subsidiaries?
3. How preventive measures taking against to disclose suspicious diseases to unrelated persons (not permitted party and union)
4. Does the institute have similar mechanism for customers due diligence and reporting for all customers?
5. Does the institution have monitoring transaction and account statement of non resident natural person, legal person, political exposed person and other non profit organisations?
6. How the institution reporting suspicious transaction and accounts for the Financial Information Unit? Does the institution archiving related documents?
7. Does the institution inspect employee's reporting on suspicious transaction?
8. Does the institution have administrative punishment for employees who not following policies and regulations of AML/CFT? Does the institution have this occasion in last 3 years?
9. Does the institution have a policy on documents archiving and registering? Please provide brief details.
10. How the institution arching documents and what measurements implementing for safety of documents? Paper, electronically, onsite, offsite storage?
11. How long would it take to retrieve the information for a particular customer going back 5 years? Has this been tested?
12. Has there been a request from the authorities (e.g. FIU) for customer data? What were the results?

B.GUIDANCE TO EVALUATE POINT OF QUESTIONNAIRES ON QUALITY

I. Corporate governance and role of the board

1. Does the institution have a regulation anti money laundering and counter financing of terrorism?
 - If the participant have a regulation on CML/AFT regulation to combating money laundering and financing of terrorism, **1 point**
 - If the participant's regulation on AML/CFT has been under verification process, **2 point**
 - If the participant have not regulation on AML/CFT, but they are following Law on Combating Money Laundering and Financing of Terrorism, **3 point**
 - If the participant have never approved AML/CFT Regulation, but they solving related issues, **4 point**
 - If the participant have never approved AML/CFT Regulation, **5 points**
2. What is the frequency to renewing the regulations?
 - If the participant keeping stability of the AML/CFT Regulations and renewing regulations in necessity case to coordinate activities that not articulated in regulation and related laws amended, **1 point**
 - If the participant keeps stability of the regulation and renewing AML/CFT Regulations in necessity case to coordinate activities that not articulated in regulation, **2 point**
 - If the participant renews AML/CFT Regulations permanently or annually, **3 point**
 - If the participant renews AML/CFT Regulations permanently or quarterly, **4 point**
 - If the participant never renewed AML/CFT Regulations, **5 point**.
3. Does the institution implementing programs anti money laundering and financing of terrorism? If yes, please give more details about your implemented program.
 - If implementing AML/CFM Program, **1 point**
 - If the participant trying to implement AML/CFM Program, **2 point**.
 - If the participant implemented AML/CFM Program, **3 point**
 - If the participant never implemented AML/CFM Program, **4 point**
 - If the participant never implemented AML/CFM Program based on their aspects of AML/CFM Program, **5 point**
4. Does the AML/CFT program include requirements on risk management and suspicious transaction reports? How you monitoring effective implementation of the program in related units and departments?
 - Anti money laundering and counter financing of terrorism program conducted requirement of risk management and suspicious transaction report and the unit of AML/CFT has inspection activities, **1 point**.
 - Anti money laundering and counter financing of terrorism program conducted requirement of risk management and suspicious transaction, have not any unit for AML/CFT, but the participants monitoring implementation of the regulation, **2 point**

- Anti money laundering and counter financing of terrorism program conducted requirement of risk management and suspicious transaction report and have not any unit for AML/CFT. In this case the participant not monitoring implementation of the regulation, **3 point**
 - Anti money laundering and counter financing of terrorism program not conducted requirement of risk management and suspicious transaction report but the unit for AML/CFT monitoring implementation of the regulation. **4 point**
 - Anti money laundering and counter financing of terrorism program not conducted requirement of risk management and suspicious transaction report but the unit for AML/CFT monitoring implementation of the regulation. **4 point**
 - Anti money laundering and counter financing of terrorism program not conducted requirement of risk management and suspicious transaction report and have not any unit for AML/CFT. In this case the participant not monitoring implementation of the regulation, **5 point**
5. Has your board of directors appointed compliance officer anti money laundering and counter financing of terrorism?
- AML/CFT Compliance unit appointed, **1 point**
 - AML/CFT Compliance officer appointed, **2 point**
 - Internal audit responds AML/CFT, **3 point**
 - AML/CFT Compliance officer appoints in necessity case, **4 point**
 - Have not any AML/CFT Compliance officer or unit, **5 point**
6. Does the board of directors adopts and overseen the reports of AML/CFT programs?
- The Board of Directors always adopts and overseen reports of AML/CFT /once in a month/ **1 point**
 - The Board of Directors sometimes adopts and overseen reports of AML/CFT /once in a quarter/ **2 point**
 - The Board of Directors often adopts and overseen reports of AML/CFT /once in a year/ **3 point**
 - The Board of Directors adopts and overseen reports of AML/CFT only in necessity case **4 point**
7. How the boards of directors are participating for AML/FT programs? Please give more details about measurements of board of directors.
- The Board of Directors is operating in all level of the program, **1 point**
 - The Board of Directors is only monitoring and the unit or officer responded the program, **2 point**
 - The Board of Directors is only monitoring implementing of the program, **3 point**
 - The Board of Directors is never taking any measurements and the unit or officer responded the program, **4 point**
 - The Board of Directors is never taking any measurements for this program, **5 point**

8. Does the board of directors are cooperating with internal auditing on AML/CFT?
- The Board of Directors is cooperating with internal auditing on AML/CFT, **1 point**
 - The Board of Directors is cooperating with internal auditing on AML/CFT only in necessity case, **2 point**
 - The participant has a unit for AML/CFT, so internal auditing is not implementing measurements on this sector. So the Board of Director is not cooperating with internal auditing, **3 point**
 - The internal auditing has responding monitoring of AML/CFT activities. So the board of directors is not cooperating with internal auditing, **4 point**
 - The internal auditing is not implementing measurements on AML/CFT. So the board of director is not cooperating with internal auditing. **5 point**
9. Has your organisation implementing ethic code? Is the code includes issues on AML/CFT?
- The participant has implementing ethic code and the code includes issues on AML/CFT, **1 point**
 - The participant has implementing ethic code and working to include issues on AML/CFT in the code, **2 point**
 - The participant has implementing ethic code, but the code not including issues on AML,CFT, **3 point**
 - The participant has implementing ethic code, but the participant summarizes no need to include issues on AML/CFT in ethic code, **4 point**
 - The participant is not processed any ethic code, **5 point**
10. Does the institution have a system for monitoring and reporting unusual and suspicious activity? Does the system have a capacity to find suspicious transaction? If yes, please attach statistical analyzes.
- If the institution have a system for monitoring and reporting customer's transaction and the system has capacity to find suspicious transaction, **1 point**
 - If the institution have not a system for monitoring and reporting customer's transaction, but the institution have a system to find unusual and suspicious transaction. **2 point**
 - If the institution have a system for monitoring and reporting customer's transaction, but the system has not capacity to find suspicious transaction and the institution is working to add capacity to find suspicious transaction in a system, **3 point**
 - If the institution have a system for monitoring and reporting customer's transaction, but the system has not capacity to find suspicious transaction, **4 point**
 - If the institution have not a system for monitoring and reporting customer's transaction and no capacity to find suspicious transaction, **5 point**
11. Does the institution's user database have merging with information system?
- If the user database have merging with information system, **1 point**
 - The institution have user's database, but the database is not merging with information system, **2 point**

- The institution takes necessary information of customers, but the customer's information is not merging with information system. The reason is the institution has not any user's database. **3 point**
 - The institution takes only general information of customers and the customer's information is not merging with information system. The reason is the institution has not any user's database. **4 point**
 - The institution has not established user database and never take customer's information, **5 point**
13. Does the board of directors adopted and overseen the operation and result of above mentioned system?
- The Board of Directors always introduces with operation of the system /every month/ **1 point**
 - The Board of Directors sometimes introduces with operation of the system /every quarter/ **2 point**
 - The Board of Directors often introduces with operation of the system /once in a year/ **3 point**
 - The Board of Directors introduces with operation of the system only in necessity case, **4 point**
 - The Board of Directors never introduces with operation of the system, **5 point**

II. Regulation: Customer due diligence

1. Has the institution approved regulation on CDD?
- The institution has the regulation for their organisation, **1 point**
 - The regulation has processed and being under approving process, **2 point**
 - The institution has not regulation but they are following 5th article "Customer Due Diligence" of Law on Combating Money Laundering and Terrorism Financing, **3 point**
 - The institution has not regulation and officer makes related decisions only in necessity case, **4 point**
 - The institution has not regulation / Not implementing any regulation on CDD/, **5 point**

/If the institution answered as the institution has not regulation, no need to ask 2 – 7 and 9th questions and give 5 points for each question!/

2. What is the frequency to renewing or updating the regulations? When are you renewed your regulation?
- Always, **1 point**
 - Sometimes, **2 point**
 - Only in necessity case, **3 point**
 - Often, **4 point**
 - Never updating or renewing, **5 point**
3. Has the institution introducing renews or updates of regulations to the administration and workers? How do you introducing renewed regulations?

- Introducing all updates and renews by all worker's meeting, **1 point**
- If delivering all updates and renews by e-mail to all workers, **2 point**
- If all updates and renews introduces on news board, **3 point**
- If introducing updates and renews to only administration , **4 point**
- If only renewed or updated person knows about updates and renews of the regulation, **5 point**. Other workers checks updates and renews only in necessity case. /Never renewing or updating institutions take this point /

4. Does the institution have included below mentioned persons in your AML/FT Regulation?
Such as:

- Resident Person
- Non Resident Person
- Legal entity: Company
- Trust organisation /law and religion/буяны байгууллага
- Beneficiary owner
- High risk customers of the list of international organisations Олон улсын байгууллагаас гаргасан жагсаалт (The United Nations List on Terrorism)
- Politically exposed person
- Non profit organization
- Others

- If included (8-9) entities, **1 point**.
- If included (6-7) entities, **2 point**
- If included (3-5) entities, **3 point**
- If included (1-2) entities, **4 оноо**
- If not included none of above mentioned entities and implementing regulations, **5 point**

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- Included all high risky entities such as resident natural person, legal person, politically exposed person and high risky entities of the international lists (UN Terrorism List etc), **1 point**
 - Included one of above mentioned entities, **2 point**
 - Included all of above mentioned entities but insufficient coordination on regulation, **3 point**. /Take detailed survey about articles of regulation/
 - Not included above mentioned entities, but requires related documents from the entities in necessity case **4 point**
 - Not included all of above mentioned entities, **5 point**
- Does the institution have implementing above mentioned regulation on their branches and subsidiaries?
 - Implementing on all branches and central office, **1 point**
 - Implementing on branches with many customers, **2 point**
 - Implementing on branches that located in central area, **3 point**
 - Implementing on some branches, **4 point**. /By the institution's overview/
 - Not implementing on their branches, **5 point**

- Does the institution have processed your regulation according law on Money Laundering and Terrorism Financing?
 - Processed according Law on Money Laundering and Terrorism Financing, **1 point**
 - Included most articles, **2 point**
 - Included some articles, **3 point**
 - Not processed according above mentioned law, **4 point**
 - Not implementing regulation on customer due diligence, **5 point**

- Does the AML/CFT Regulation included below mentioned requirements?
 - Registration of transaction details/business relationship.
 - Usage of special process on customer due diligence for politically exposed person or high risk customers.
 - Appoint compliance officer under mission to regulate high risk customers and politically exposed person.
 - Update customer's information database
 - Recording and monitoring of transactions and customers
 - Reporting of suspicious transactions to related organizations
 - Included all (6) requirements, **1 point**
 - Included (5-4) requirements, **2 point**
 - Included (2-3) requirements, **3 point**
 - Included 1 requirement, **4 point**
 - Included none of requirements and not implementing this regulation, **5 point**

- Does the institution takes below mentioned information about beneficiary owner in case of your customer is accredited representative and intermediary? It includes:
 - Legal relationship and empowerment of power of attorney
 - Information about assets resource of beneficiary owners
 - Reference of the administration or owner of representing company
 - Take all (3) information, **1 point**
 - Take (2) information, **2 point**
 - Take (1) information, **3 point**
 - Take none of this information, but taking other inessential information, **4 point**
 - Not taking any information, **5 point**

- Does the institution include below mentioned requirements for new customers due diligence operation? It includes:
 - Inspection of confirmation documents
 - In person meeting with new customers
 - Provide by information with independent resource
 - Close inspection for customers who related with high risk business or high risk countries

- As a company, take information on prospective transaction, financial reports, location and their business
- Included all of (5) requirements, **1 point**
 - Included (4) requirements, **2 point**
 - Included (3-2) requirements, **3 point**
 - Included (1) requirement, **4 point**
 - Included none of above mentioned requirements, **5 point**
- What types of customers does the institution refuse to do business with? Why?
 - Customers that assessed as high risk by regulations on customer due diligence, **1 point**
 - High risk customers of Law on Money Laundering and Terrorism Financing, **2 point**
 - Customer who requested service for unusual and high amount transaction with undefined resource, **3 point**
 - Customers that summarized as high risk by overview of the institution, **4 point**
 - Providing same service for all customers and not classifying customers by their risk, **5 point**
- Does the institution taking below mentioned information on resource of their cash from the customer during their transaction? It includes:
 - Resource information /name and address of natural and legal person /
 - Amount of transfer
 - Date of transfer
 - Payment guidance
 - Reference of receiver bank
 - Name and address of receiver
 - Transfer purpose
 - Taking (7-6) information, **1 point**
 - Taking (4-5) information, **2 point**
 - Taking (2-3) information, **3 point**
 - Taking only 1 information, **4 point**
 - Not taking any information and not requiring any additional information, **5 point**

III. Risk management

1. Does the institution have a unit or department to implement risk management? Does the risk management include risk issues on money laundering and financing of terrorism?
 - The institution has a unit or department to implement risk management and the institution included risk issues on ML/FT, **1 point**
 - The institution has a unit or department to implement risk management and the institution included some part of risk issues on ML/FT, **2 point**
 - The institution has not a unit or department to implement risk management, but the institution responds for risk issues on ML/FT, **3 point**

- The institution has a unit or department to implement risk management. But the risk management not includes risk issues on ML/FT, **4 point**
 - The institution has not a unit or department to implement risk management and not included risk issues on ML/FT, **5 point**
2. Does the institution have making risk assessment on money laundering and financing of terrorism? If yes, what is the assessment range and frequency? How the institution makes assessment?
- Always making risk management with stabilized frequency and implementing international methodology on assessment /frequency: every month/, **1 point**
 - Make risk management with stabilized frequency and implementing internal methodology on assessment /frequency: 6 times in a year/, **2 point**
 - Make risk management with stabilized frequency and the institution has not implementing any methodology on assessment /frequency: 4 times in a year/ **3 point**
 - Make risk management, but not have stabilized frequency and the institution has not implementing any methodology on assessment , **4 point**
 - Never make risk assessment, **5 point**
3. Does the institution have a risk classification system for money laundering and financing of terrorism? If yes, please provide more details about this system.
- If the institution has a risk system and international classification on ML/FT, **1 point**
 - If the institution has a risk system and classification on ML/FT, **2 point**
 - If the institution has a risk system but have not any classification on ML/FT, **3 point**
 - If the institution has not a risk system on ML/FT, but classifying manually **4 point**
 - If the institution has not a risk system and classification on ML/FT, **5 point**
4. Does the institution classify high risk customers or products? How classifying?
- Determined high risk products and classified customers by their risk level /by international methodology/, **1 point**
 - Determined high risk products and classified customers by their risk level /by institution's methodology/, **2 point**
 - Determined high risk products and not classified customers by their risk level, **3 point**
 - Classified only customers by their age, sex and education, **4 point**
 - Has not any classification, **5 point**
5. Does the institution take into account ML/FT risks in approving expansion of business e.g. new branches and markets (domestic and foreign)? If so who participates in the assessment of such risks?
- Closely taking into account for all risks **1 point**
 - Assessing risks by the institution's processed methodology, **2 point**
 - Assessing risks and not closely taking account for risks, **3 point**
 - Trying to assess risks, but it is impossible to assess risk, **4 point**
 - Not assessing risks, **5 point**

6. If your institution introducing new product or service, how the institution assess risk of money laundering and financing of terrorism? Does have any regulation or policy on this situation? How the institution making risk assessment?
- The institution approved regulation, rule, policy and assess risks by international methodology, **1 point**
 - The institution approved regulation, rule, policy and assess risks by internal methodology, **2 point**
 - The institution assesses risks but has not any regulation, rule and policy, **3 point**
 - The institution not assesses risk by has regulation, rule and policy, **4 point**
 - Not assessing risks and has not any regulation, **5 point**
7. Does your institution reporting about risk of money laundering and financing of terrorism for board of directors and higher organizations? How reporting?
- Reporting about risks of ML/FT in every quarter, **1 point**
 - Reporting about risks of ML/FT once in a half year, **2 point**
 - Reporting about risks of ML/FT once in a year, **3 point**
 - Will report about risks of ML/FT /Under implementation process/, **4 point**
 - Has not any report of ML/FT, **5 point**

IV. Domestic supervision, internal and external auditing

1. Does the institution have an Internal Audit Unit/Department function? Does it review and test the AML/CFT program, policies and procedures and in particular those related CDD, STR and record keeping? Is there a specific AML/CFT audit plan?
- The institution has an Internal Audit Unit/Department function and supervising implementation of regulations and policies on ML/FT, **1 point**
 - The institution has not Internal Audit Unit/Department function, but supervising implementation of regulations and policies on ML/FT, **2 point**
 - The institution has not Internal Audit Unit/Department function, but approved regulations and policies on ML/FT, but not supervising implementation, **3 point**
 - The institution has an Internal Audit Unit/Department function and not supervising implementation of regulations and policies on ML/FT, **4 point**
 - Has not Internal Audit Unit /Department, **5 point**
2. If the institution supervising operations on AML/CFT, how frequent is the supervision conducted? When was the last time interval audit review AML/CFT? Please provide more details on last assessment, inspection range and results.
- Monthly, **1 point**
 - Quarterly, **2 point**
 - Half yearly, **3 point**

- Annual, **4 point**
 - Biannual, **5 point**
3. How many employees in internal audit unit? How much time is your unit spending for operations for AML/CFT?
- The institution has internal audit unit and spend enough time, **1 point**
 - The institution has internal audit unit and spend times in only necessity case, **2 point**
 - The institution has internal audit unit and take into account of operations for AML/CFT, **3 point**
 - The institution has internal audit unit but not supervising operations for AML/CFT, **4 point**
 - Not spending time on this and has not internal audit unit, **5 point**
4. Please determine your internal auditing supervision and reporting system. Who receiving this report and these reports included issues on ML/CF?
- Has the internal auditing and included sufficient issues on ML/CF, **1 point**
 - Has the internal auditing and included some issues on ML/CF, **2 point**
 - Has the internal auditing and included small issues on ML/CF, **3 point**
 - Has the internal auditing and not includes issues on ML/CF, **4 point**
 - Has not auditing or not includes issues on ML/CF , **5 point**
5. Does the external auditor's review of the internal control environment cover AML/FT controls? If yes, please provide result of this external auditing.
- Yes. Summarized as has not risk on operations of ML/FT, **1 point**
 - Yes. Summarized as low risk on operations of ML/FT, **2 point**
 - Yes. Summarized as high risk on operations of ML/FT, **3 point**
 - No. But planning to appoint external auditor's review. Or Yes and Summarized as very high risk on operations of ML/FT, **4 point**
 - If No, **5 point**

V. Compliance

1. Has the institution appointed an AML/CFT compliance officer? If so provide the name, functions, position and major skills.
- The institution appointed AML/CFT Compliance officer and determined all of related information and functions, **1 point**
 - The institution appointed AML/CFT Compliance officer and determined all of implementing functions on AML/CFT, **2 point**
 - However the compliance officer appointed but not closely determined implementing activities and their duties on AML/CFT, **3 point**

- Not appointed compliance officer but appointed other worker who responding duties of compliance officer, **4 point**
- No need to ask questions of this chapter in case of not appointed compliance officer and give 5 points for this chapter.

/The compliance officer means an officer who responded preventive measures mitigate risks and provide implementation of regulation, policies and laws on Combating Money Laundering and Terrorism Financing./

2. Does the compliance officer carry on duties other than AML/CFT? If so, what other functions and what proportion of time is devoted to AML/CFT?

- The institution appointed compliance officer and the officer is working for combating money laundering and financing of terrorism, **1 point**
- Has responded other duties of compliance officer's duties and working to prepare planning on anti money laundering and counter financing of terrorism, **2 point**
Has responded other duties of compliance officer's duties, not planned to work on AML/CFT, but spending some of their work time to implement duties of compliance officer, **3 point**
- Has responded other duties of compliance officer's duties, not planned to work on AML/CFT and not actively operation however responded duties of compliance officer, **4 point**
- Not determined duties of compliance officer and not actively operation on AML/CFT, **5 point**

3. To whom does the compliance officer report and how often?

- Referenced receivable person and reporting schedule of compliance officer and reporting permanently, **1 point**
- Referenced receivable person of compliance officer's operation report but not referenced reporting schedule, **2 point**
- The compliance officer processes operation reports within referenced schedule, but not introducing their reports and not referenced receivable person of their report, **3 point**
- The compliance officer processes operation reports only in required case, **4 point**
- The compliance officer never processes operation report, **5 point**

4. Please provide abstract result of compliance officer's last report on money laundering and financing of terrorism.

- The report result has approved and includes details on implemented operations for AML/CFT, implementation, result, implemented effectively according duties of compliance officer, **1 point**
- The report result has approved and includes details on implemented operations for AML/CFT, implementation and results. But implemented operations are insufficient, **2 point**
- The report result has approved and includes details on implemented operations for AML/CFT, implementation and results. But the implementation and result of implemented operations are not enough, **3 point**

- The report result has approved but implemented operations for AML/CFT are ineffective and result as not enough, **4 point**
 - The report result has not approved or not processed reports, **5 point**
5. Describe the role of the AML/CFT compliance officer in (a) monitoring and reporting of suspicious activities; (b) training; (c) development of risk management systems and controls, (d) reporting breaches of established policies and procedures with regard to AML/CFT to senior management.
- Fluently determined 3 duties, referenced duties of compliance officer and included all of compliance officer's implementing operations according their duties, **1 point**
 - Fluently determined 3 duties and included some of compliance officer's implementing operations, **2 point**
 - Fluently determined 2 duties and included some of compliance officer's implementing operations according aforesaid duties, **3 point**
 - Fluently determined one of the duties and implementing operations of compliance officer is not enough, **4 point**
 - Not determined duties and not implementing any operations, **5 point**

VI. Training and human resource

1. Does the institution have training program on AML/CFT for employees?
- The institution has training program on AML/CFT, **1 point**
 - If the training program included training for money laundering and financing of terrorism, **2 point**
 - The institution has not training program on AML/CFT, but organizing related training, **3 point**
 - The institution has training program on AML/CFT, but not organizing training for AML/CFT, **4 point**
 - Has not training program and not organizing training, **5 point**
2. Please specify frequency of training provided. When was the last training program delivered?
- The frequency of training providing is high and delivered last training within last month, **1 point**
 - The frequency of training providing is high and delivered last training within last 3 months, **2 point**
 - The frequency of training providing is high and delivered last training within last 6 months, **3 point**
 - The frequency of training providing is low and delivered last training within last year, **4 point**
 - The frequency of training providing is low and not delivered any training within last year, **5 point**

3. Who are required to participate the AML/CFT training? How the institution delivering training for new employee?
 - The training delivering by all operation directions. New employees providing by a training permanently, **1 point**
 - Delivering training for new employee but not delivering by all operation direction, **2 point**
 - Delivering training for new employee and operation directions in necessity case, **3 point**
 - Delivering training but not delivering training for new employee and operation directions, **4 point**
 - Not delivering trainings, **5 point**

4. Has the institution board adopted a formal training program for AML/CFT? Please provide brief details about training.
 - Delivering training for administration and board of directors and provided training information, **1 point**
 - Delivered training for administration and board of directors, **2 point**
 - Not delivering training for administration and board of directors, but the administrations permanently including for training, **3 point**
 - Not delivering training for board of directors, but delivered training for administration, **4 point**
 - Not delivered training for board of directors and administration and not provided information, **5 point**

5. How much the training budget of last year for AML/CFT and current year?
 - The enough budget for training on AML/CFT, **1 point**
 - Not approved enough budget for AML/CFT, **2 point**
 - The budget for training on AML/CFT has financed by training budget or operation budget for AML/CFT, **3 point**
 - The financing has approving on onsite of training delivering, **4 point**
 - Not shared training budget and financing, **5 point**

VII. Reporting and recordkeeping

1. Does the institution have a system for monitoring and reporting unusual and suspicious activity? How, manually or automated?
 - Fully automated system for unusual and suspicious activity, **1 point**
 - Manually system for unusual and suspicious activity, **2 point**
 - Testing or researching system for unusual and suspicious activity, **3 point**
 - Summarizing that no need to introduce system for unusual and suspicious activity. Solving issues on this sector at domestic, **4 point**
 - Not implementing any operations to detect unusual or suspicious activity, **5 point**

2. Does the institution have a system for monitoring and reporting unusual and suspicious activity on a group-wide basis from branches and subsidiaries?
 - Fully automated system for unusual and suspicious activity for all branches and subsidiaries, **1 point**
 - All subsidiary and branches have a unit to monitor unusual and suspicious transaction. **2 point** /have not a system and independent unit/
 - Has a reporting and monitoring system at branches or subsidiaries that making high amounted transaction, **3 point**
 - Has a system for unusual and suspicious transaction at only central office, **4 point**
 - Has not system for unusual and suspicious activity at all branches and subsidiaries, **5 point**

3. How preventive measures taking against to disclose suspicious diseases to unrelated persons (not permitted party and union)
 - Only related unit knows about unusual or suspicious transaction and it's prohibited to disclose by company regulations and charter, **1 point**
 - Related unit and employees knows about unusual or suspicious transaction and it's prohibited to disclose by company regulations and charter, **2 point**
 - However employees prohibited to disclose information about unusual or suspicious transaction, but impossible to monitor all employees, **3 point**
 - However, employees has not duty to keep information about unusual or suspicious transaction, but the administration always warns to keep information about unusual or suspicious transaction, **4 point**
 - Has not any preventive measures to disclose information about unusual or suspicious transaction, **5 point**

4. Does the institute have similar mechanism for customers due diligence and reporting for all customers?
 - Different for all customers, **1 point**
 - Different for politically exposed person, non resident natural person or legal person, **2 point**
 - Has a supervision mechanism for customers who making high amounted transaction, **3 point**
 - Similar for all customers, **4 points**
 - Has not supervision mechanism for customer's monitoring and reporting, **5 point**

5. Does the institution have monitoring transaction and account statement of non resident natural person, legal person, political exposed person and other non profit organisations?
 - Monitoring all customer's account information and transactions to prevent from suspicious transaction, **1 point** өгнө.
 - Monitoring account information and transactions of profit organisation, politically exposed person, non resident natural person and legal person, **2 point**

- Monitoring account information of customers who making high amounted transaction, **3 point**
 - Monitoring account information of non resident natural and legal person who making high amounted transaction, **4 point**
 - Not monitoring customer's account information and transactions, **5 point**
6. How the institution reporting suspicious transaction and accounts for the Financial Information Unit? Does the institution archiving related documents?
- If detected suspicious transaction, immediately stop transaction and deliver reports to the Financial Information Unit and archiving or keeping related documents, **1 point**
 - If detected suspicious transaction, immediately stop transaction and deliver reports to the Financial Information Unit but not archiving or keeping related documents, **2 point**
 - If detected suspicious transaction, immediately stop transaction and archiving or keeping related documents, but not delivering report to the Financial Information Unit, **3 point**
 - If detected suspicious transaction, immediately stop transaction and not archiving or keeping related documents, not delivering report to the Financial Information Unit, **4 point**
 - Impossible to detect suspicious transaction and not taking measures, **5 point**
7. Does the institution inspect employee's reporting on suspicious transaction?
- All employees responded duty to report suspicious transaction by the institution regulation and related officer /Board of Directors/ always monitoring, **1 point**
 - All employees responded duty to report suspicious transaction by the institution regulation, **2 point**
 - Implementing other activities in the institution, **3 point** /news board or independent system etc/
 - Asks from all employee but not monitoring onsite, **4 point**
 - Has not any monitoring and has not any duties, **5 point**
8. Does the institution have administrative punishment for employees who not following policies and regulations of AML/CFT? Does the institution have this occasion in last 3 years?
- Punishing according the institution's regulation or related law, **1 point**
 - Punishing according the institution's regulation, **2 point**
 - The Board of Directors punishing faulted employees and not coordinated by related regulation, **3 point**
 - Working to include punishment articles in the institution's regulation, **4 point**
 - Has not any punishment, **5 point**
9. Does the institution have a policy on documents archiving and registering? Please provide brief details.
- If archiving and registering all documents and establishing information database, **1 point**
 - If registering documents and all employees keeping documents, **2 point**

- If archiving documents but not registering documents, **3 point**
- If registering documents but not archiving, **4 point**
- If not registering and archiving documents, **5 point**

10. How the institution archiving documents and what measurements implementing for safety of documents? Paper, electronically, onsite, offsite storage?

- If archiving documents by paper in joint safe place, **1 point**
- If archiving documents by electronically by one file with virus protection, **2 point**
- If archiving documents on all employees desk at onsite, **3 point**
- If archiving documents at other place of work place, **4 point** /in dangerous condition/
- If not archiving or keeping documents, **5 point**

11. How long would it take to retrieve the information for a particular customer going back 5 years? Has this been tested?

- If the institution can retrieve all customer's information without any delays who served since the establishment of the institute, **1 point**
- The institution has appointed a documentary employee and need permission to retrieve customer's information, **2 point** /require time/
- Need to filter from the archive, **3 point** /require much time/
- All employees archived their customer's information, so should retrieve documents from the employees, **4 point**, /Unclear for who archived what documents /
- Very difficult to retrieve the information for a particular customer going back 5 years and not registered into their system, **5 point**

/Ask process of archiving and rate them based on their archiving condition, the institution must be retrieve information of previous 5 years without any delay /

12. Has there been a request from the authorities (e.g. FIU) for customer data? What were the results?

- Possible to reply onsite for all requests of authorities, 1 point.
- Requires 3 work days to reply for the request, **2 point**
- Requires 5 work days to reply for the request, **4 point**
- Requires more than 5 days in possible condition to reply for the request, 4 days
- Impossible to give customer's information and not established customer's information database, **5 point**

2. Questionnaire of real estate agents

QUESTIONNAIRE FOR QUALITATIVE ASSESSMENT

A – General Information	
1. Name of the owners (natural person) :	
2. Name of the legal entity	

3. Type of legal entity: (for example: sole proprietorship, partnership, private limited company, etc.)	1) Exchanged stocks on stock market, /foreign, domestic/ 2) Natural person 3) Legal entity 4) Foreign invested 5) Ownership of politically exposed person 6) Other /please provide more details/
4. Registration number of legal entity:	
5. Address of headquarter:	
6. Address of branches:	
7. Website:	
8. Business telephone:	
9. Business e-mail:	
10. Асуулга бөглөсөн он сар өдөр:	
B. Compliance Officer	
Compliance Officer 1. Name and title of the compliance officer	Tel: Fax: E-mail:
Person that completed this questionnaire 2. Name and title of the person that completed this questionnaire (if different from compliance officer)	Tel: Fax: E-mail:
C. Company governance	
1. Please describe the management structure of your entity (including attaching an organizational chart), if applicable. Provide additional information in an annex if necessary.	
2. Who is the beneficial owner ¹ of your entity?	
3. Is the owner a Mongolian resident or non resident	1. Yes 2. No
4. On what date did your entity start its operations in Mongolia?	
5. What reach does your entity have (select all that are applicable)	1. Rural area 2. In Ulaanbaatar city 3. National 4. International
6. What resource are you used to process your real estate property list (For example: интернет, circle of acquaintances)	
D. Structure and size of the entity	
1. What is your 2017's commission from the buying and selling of real estate	
2. Number of employees	
3. Do you have branches or subsidiaries? 3.1 In Mongolia?	a) No b) Yes If yes, quantity of branches
3.2 Abroad?	a) No b) Yes if yes, quantity of branches and location?

¹ Beneficial owner refers to natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement or hold 10% or more share of a company.

	1.	
	2.	
	3.	
	4.	
	5.	
4. Does your company is subsidiary of other company?	a) No b) Yes	
5. Does your company cooperating with broker/representative/real estate agents and related legal entities?	a) No b) Yes	
6. If yes, please provide more details about your cooperation entity? (Name of the entity and activity direction)		
E. Бүтээгдэхүүн/Үйлчилгээ		
1. Do you accept payments or deposits during the buying or selling of real estate?	a) No b) Yes	
2. What payments methods do you accept from clients for the buying or selling of real estate?	Payment type	Answer
	Cash	a) No b) Yes
	Electron transaction	a) No b) Yes
	Account	a) No b) Yes
	Other	
2.1 If your company uses cash payment type, what is your received highest amount of cash?		
3. Do you offer the following services	a) No b) Yes	
3.1 Buying or selling of residential properties		
3.2 Buying or selling of commercial properties?	a) No b) Yes	
3.3 Renting of residential properties?	a) No b) Yes	
3.4 Renting commercial properties?	a) No b) Yes	
4. Do you make real estate property purchases from first market /construction company e.g./	a) No b) Yes	
6. What is the highest property value that you buy and sell in 2017? (MNT)		
F. Distribution channel		
1. Do you conduct non face-to-face transactions where you never meet the client?	a) No b) Yes If yes, how many transactions annually:	
G. Compliance officer		
1. Have you appointed a compliance officer?	a) No b) Yes	
2. Is your compliance officer part of management	a) No b) Yes	
H. Policies and procedures		
1. Has your organization developed and implemented policies and procedures to comply with the AML/CFT Law and the Convention of the Suppression of Terrorist Financing (for example requirements related to customer due diligence, record keeping and reporting)?	a) No b) Дутуу c) Yes	
2. Хэрэв yes бол, баримтжуулсан дотоод бодлого, журамтай юу?	a) No b) Yes	
3. If yes, when were your policies and procedures adopted?	a) Before January 2018 b) After January 2018	

I. Risk Assessment	
1. Have you identified and assessed the ML/FT risks related to your activities?	a) No b) Yes
2. Have you implemented risk mitigation strategies?	a) No b) Partially fulfilled c) Yes
3. How often do you undertake risk monitoring?	a) less than one in More than quarter b) Quarterly c) Monthly
J. Supervision, internal/external audit	
1. Has your organization conducted an independent audit/review of its AML/CFT policies and procedures?	a) No b) Yes
2. If yes, who conducted the audit/review	a) Self audit b) Internal audit unit c) External auditor
3. If yes, what is the frequency of the AML/CFT audit/review?	a) Every year b) Less than every two years c) More than every two years
K. Training and Human Resource	
1. Have you organized training for your employees related to AML/CFT risk and obligations?	a) No b) Yes
2. If yes, what is the frequency of the training	a) Once a year or more frequently b) When an employee is hired c) Once a year
3. If yes, what type of individuals participate in the training?	a) All employees including management b) Only employees that interact with customers c) Only other directors d) Other
L. Customer due diligence	
1. Do you identify and verify the identity of all your customers?	a) No b) Yes
2. Do you update customer information when conducting a transaction?	a) No b) Yes
M. New technologies	
1. Have you completed an assessment of the risks related to new technologies?	a) No b) Yes
N. Enhanced due diligence	
1. Is enhanced due diligence applied to high-risk situations or customers?	a) No b) Yes
2. Do you apply enhanced customer due diligence measures for politically exposed persons?	a) No b) Yes
3. Do you apply enhanced customer due diligence measures for high-risk jurisdictions?	a) No b) Yes
O. Record keeping	
1. Do you maintain records related to transactions, business relationships and STRs?	a) No b) Yes
P. Reporting and monitoring	
1. Have you sent a suspicious transaction report to FIU?	a) No b) Yes If yes, how many times in 2017?
2. Have you sent a cash transaction report to the FIU?	a) No b) Yes

	If yes, how many times in 2017?
3. Have you sent a report to the FIU in relation to United Nations Regulations?	a) No b) Yes If yes, how many times in 2017?
Q. Information on Compliance	
1. Does you consider that you are compliant with AML/CFT obligations?	a) No b) Partially c) Yes