

**USA PATRIOT ACT SECTION 312 OFFSHORE BANK LICENSE QUESTIONNAIRE**


***THIS QUESTIONNAIRE MUST BE COMPLETED FOR ALL NON-US BANKS AS AN ADDENDUM TO THE FOREIGN BANK CERTIFICATION OR RECERTIFICATION***


Section 312 of the USA PATRIOT Act ("Act" or "USPA") requires U.S. broker-dealers to identify non-U.S. customers that are banks, broker-dealers, futures commission merchants, introducing brokers, mutual funds, currency dealers or exchangers and money transmitters. Section 312 also requires enhanced due diligence for non-US banks operating under an offshore banking license.

An Offshore Banking License is defined as a license to conduct banking activities that, as a condition of the license, prohibits the licensed entity from conducting activities with the citizens, or in the local currency of, that jurisdiction that issued the license. Please circle or check (✓) the following where applicable.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <b>Client Name: ALPHA BANK ROMANIA SA</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                |
| <p><b>a. Does the non-US bank maintain a license to conduct banking activities, which, as a condition of the license prohibits the Foreign Bank from conducting banking activities with the citizens of, or with the local currency of, the jurisdiction which issued the license (hereinafter, an "Offshore Bank")?</b></p> <p>Questions b-d need only be answered if Question (a) is answered "YES"]</p> <p><b>Note: If "YES", consult with the Global Monetary and Financial Control Group prior to opening account or approving USPA regulatory AML compliance checks.</b></p> | <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| <p><b>b. Does Offshore Bank have or maintain correspondent banking accounts for other non-US banks?</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <input type="checkbox"/> YES <input type="checkbox"/> NO                       |
| <p><b>c. Is Offshore Bank publicly or privately held?</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <input type="checkbox"/> PUBLIC <input type="checkbox"/> PRIVATE               |
| <p><b>d. If privately held, name all ≥10% shareholders with residential or incorporated jurisdiction.</b></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>                                                                                                                                                                                                                                                                                                                                                                                                                  | <input type="checkbox"/> NONE <input type="checkbox"/> N/A                     |

|                                                                |                                             |
|----------------------------------------------------------------|---------------------------------------------|
| <b>Name of Financial Institution:</b><br>ALPHA BANK ROMANIA SA | <b>Date:</b><br>28 February 2019            |
| <b>Printed Name of Signatory:</b>                              | <b>Title:</b>                               |
| <b>Signature:</b>                                              | <b>Email or Direct Contact Information:</b> |

  
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