



Financial Institution Name:

Joint Stock Commercial Bank for Investment and Development of Vietnam

Location (Country) :

Vietnam

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	Joint Stock Commercial Bank for Investment and Development of Vietnam (BIDV)
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	As attached
3	Full Legal (Registered) Address	194 Tran Quang Khai Street, Ly Thai To Ward, Hoan Kiem District, Hanoi, Vietnam
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	April 26, 1957
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	Ho Chi Minh Stock Exchange, Securities symbol: BID
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	Yes
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	0%
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	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	254900FSO240QVE6NR86
2. AML, CTF & SANCTIONS PROGRAMME		
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 l	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
13 a	If Y, provide further details	
14	Does the entity have a whistleblower policy?	Yes
3. ANTI BRIBERY & CORRUPTION		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes

17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	No
4. AML, CTF & SANCTIONS POLICIES & PROCEDURES		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 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
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
5. KYC, CDD and EDD		
22	Does the Entity verify the identity of the customer?	Yes
23	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
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c	Nature of business/employment	Yes
24 d	Ownership structure	Yes
24 e	Product usage	Yes
24 f	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
25	Are each of the following identified:	
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	Yes
26	Does the due diligence process result in customers receiving a risk classification?	Yes
27	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
28	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
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
29 a	If yes, select all that apply:	
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes

29 a3	3 – 4 years	Yes
29 a4	5 years or more	No
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	Periodic Reviews frequencies base on risk rating of the clients.
30	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?	
30 a	Arms, Defence, Military	Always subject to EDD
30 b	Correspondent Banks	Restricted
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	Embassies/Consulates	Always subject to EDD
30 d	Extractive industries	EDD on risk-based approach
30 e	Gambling customers	Prohibited
30 f	General Trading Companies	EDD on a risk based approach
30 g	Marijuana-related Entities	Prohibited
30 h	MSB/MVTS customers	Restricted
30 i	Non-account customers	Restricted
30 j	Non-Government Organisations	Always subject to EDD
30 k	Non-resident customers	Restricted
30 l	Nuclear power	Do not have this category of customer or industry
30 m	Payment Service Provider	Restricted
30 n	PEPs	Always subject to EDD
30 o	PEP Close Associates	Always subject to EDD
30 p	PEP Related	Always subject to EDD
30 q	Precious metals and stones	Always subject to EDD
30 r	Red light businesses/Adult entertainment	Prohibited
30 s	Regulated charities	Always subject to EDD
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on a risk based approach
30 v	Unregulated charities	Prohibited
30 w	Used Car Dealers	EDD on a risk based approach
30 x	Virtual Asset Service Providers	Prohibited
30 y	Other (specify)	
31	If restricted, provide details of the restriction	BIDV only provides specific services to a limited types of customers as per BIDV's regulations and policy.
6. MONITORING & REPORTING		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	- Manually review the suspicious transactions generated automatically from the transaction monitoring system. - Manually review customer's behaviors when they go to bank to conduct transactions.
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	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		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
37	Does the Entity have policies, procedures and processes to reasonably comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, Specify the regulation	- AML Law No.14/2022/QH15 dated 15/11/2022. - CFT Law No.28/2013/QH13 dated 12/06/2013. - Decree No.19/2023/ND-CP dated 28/04/2023; Decree No.88/2019/ND-CP dated 14/11/2019; Decree No.122/2013/ND-CP dated 11/10/2013; Decree No.143/2021/ND-CP dated 31/12/2021; Circular No.09/2023/TT-NHNN dated 28/07/2023
37 c	If N, explain	

8. SANCTIONS		
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
41 f	Other (specify)	Other Sanction lists used by BIDV: Australia, Chinese Ministry, FBI, U.S.State Department Terrorist Exclusion List, BISN, Hong Kong, Interpol Wanted Fugitives, Singapore List, Vessel Companies List, BIDV's internal list, etc.
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
9. TRAINING & EDUCATION		
43	Does the Entity provide mandatory training, which includes:	
43 a	Identification and reporting of transactions to government authorities	Yes
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
43 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
44	Is the above mandatory training provided to :	
44 a	Board and Senior Committee Management	Yes
44 b	1st Line of Defence	Yes
44 c	2nd Line of Defence	Yes
44 d	3rd Line of Defence	Yes
44 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
44 f	Non-employed workers (contractors/consultants)	Yes
10. AUDIT		
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes

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Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

Joint Stock Commercial Bank for Investment and Development of Vietnam (Financial Institution name)

I, Đỗ Thị Khiên (Senior Compliance Manager- Second Line representative), 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.



(Signature & Date)

28/03/2024



BRANCH LIST OF BIDV

No #	Branch Name	No #	Branch Name
1	So Giao Dich 1 Branch	51	Ha Long Branch
2	Hoan Kiem Branch	52	Cam Pha Branch
3	Hai Ba Trung Branch	53	Thai Binh Branch
4	So Giao Dich 3 Branch	54	Ha Nam Branch
5	Ha Noi Branch	55	Nam Dinh Branch
6	Tay Ho Branch	56	Thanh Nam Branch
7	Dong Ha Noi Branch	57	Tam Diep Branch
8	Nam Ha Noi Branch	58	Ninh Binh Branch
9	Thang Long Branch	59	Thanh Hoa Branch
10	My Dinh Branch	60	Bim Son Branch
11	Long Bien Ha Noi Branch	61	Lam Son Branch
12	Thanh Do Branch	62	Nghe An Branch
13	Ha Thanh Branch	63	Phu Dien Branch
14	Thanh Xuan Branch	64	Phu Quy Branch
15	Dong Do Branch	65	Thanh Vinh Branch
16	Cau Giay Branch	66	Ha Tinh Branch
17	Quang Trung Branch	67	Nam Ha Tinh Branch
18	Ba Dinh Branch	68	Quang Binh Branch
19	Ha Dong Branch	69	Bac Quang Binh Branch
20	Son Tay Branch	70	Quang Tri Branch
21	Chuong Duong Branch	71	Thua Thien Hue Branch
22	Hong Ha Branch	72	Phu Xuan Branch
23	Dong Da Branch	73	Da Nang Branch
24	Trang An Branch	74	Hai Van Branch
25	Tu Liem Branch	75	Song Han Branch
26	Van Phuc Ha Noi Branch	76	Quang Nam Branch
27	Quang Minh Branch	77	Hoi An Branch
28	Dai La Branch	78	Quang Ngai Branch
29	Thai Ha Branch	79	Dung Quat Branch
30	Hoang Mai Ha Noi Branch	80	Binh Dinh Branch
31	Gia Lam Branch	81	Phu Tai Branch
32	Hoai Duc Branch	82	Quy Nhon Branch
33	Ngoc Khanh HN Branch	83	Phu Yen Branch
34	Bac Ha Branch	84	Khanh Hoa Branch
35	Vinh Phuc Branch	85	Nha Trang Branch
36	Phuc Yen Branch	86	Ninh Thuan Branch
37	Bac Ninh Branch	87	Binh Thuan Branch
38	Tu Son Branch	88	Lao Cai Branch
39	Kinh Bac Branch	89	Sa Pa Branch
40	Hai Duong Branch	90	Dien Bien Branch
41	Bac Hai Duong Branch	91	Lang Son Branch
42	Thanh Dong Branch	92	Ha Giang Branch
43	Bac Hung Yen Branch	93	Bac Giang Branch
44	Hung Yen Branch	94	Hoa Binh Branch
45	Hai Phong Branch	95	Son La Branch
46	Dong Hai Phong Branch	96	Yen Bai Branch
47	Lach Tray Branch	97	Cao Bang Branch
48	Quang Ninh Branch	98	Tuyen Quang Branch
49	Mong Cai Branch	99	Bac Kan Branch
50	Tay Nam Quang Ninh Branch	100	Lai Chau Branch

BRANCH LIST OF BIDV

No #	Branch Name	No #	Branch Name
101	Thai Nguyen Branch	146	Binh Thanh Branch
102	Nam Thai Nguyen Branch	147	Quan 3 Ho Chi Minh City Branch
103	Phu Tho Branch	148	Ba Muoi Thang Tu Branch
104	Hung Vuong Branch	149	Binh Tan Branch
105	Gia Lai Branch	150	Thu Thiem Branch
106	Nam Gia Lai Branch	151	Thu Duc City Branch
107	Pho Nui Branch	152	Chau Thanh Sai Gon Branch
108	Daklak Branch	153	Dong Nai Branch
109	Dong Daklak Branch	154	Nam Dong Nai Branch
110	Buon Ho Branch	155	Dong Dong Nai Branch
111	Ban Me Branch	156	Bien Hoa Branch
112	Lam Dong Branch	157	Ba Ria - Vung Tau Branch
113	Bao Loc Branch	158	Ba Ria Branch
114	Da Lat Branch	159	Phu My Branch
115	Kontum Branch	160	Vung Tau - Con Dao Branch
116	Dak Nong Branch	161	Binh Duong Branch
117	Ho Chi Minh City Branch	162	Nam Binh Duong Branch
118	Phu Nhuan Branch	163	My Phuoc Branch
119	Bac Sai Gon Branch	164	Thu Dau Mot Branch
120	So Giao Dich 2 Branch	165	Di An Binh Duong Branch
121	Nam Sai Gon Branch	166	Binh Phuoc Branch
122	Sai Gon Branch	167	Tay Ninh Branch
123	Cho Lon Branch	168	Long An Branch
124	Tay Sai Gon Branch	169	Moc Hoa Branch
125	Dong Sai Gon Branch	170	Tien Giang Branch
126	Nam Ky Khoi Nghia Branch	171	My Tho Branch
127	Gia Dinh Branch	172	Ben Tre Branch
128	Ben Thanh Branch	173	Dong Khoi Branch
129	Ben Nghe Branch	174	Tra Vinh Branch
130	Ba Thang Hai Branch	175	Vinh Long Branch
131	Tan Binh Branch	176	Soc Trang Branch
132	Cu Chi Branch	177	Can Tho Branch
133	Phu My Hung Branch	178	Dong Bang Sung Cuu Long Branch
134	Hoc Mon Branch	179	Tay Do Branch
135	Binh Chanh Branch	180	Dong Thap Branch
136	Ham Nghi Branch	181	Sa Dec Branch
137	Ky Hoa Branch	182	An Giang Branch
138	Truong Son Branch	183	Bac An Giang Branch
139	Ba Chieu Branch	184	Kien Giang Branch
140	Thong Nhat Branch	185	Phu Quoc Branch
141	Nha Be Branch	186	Bac Lieu Branch
142	Binh Hung Branch	187	Ca Mau Branch
143	Trung Tam Sai Gon Branch	188	Dat Mui Branch
144	Binh Dien Sai Gon Branch	189	Hau Giang Branch
145	Quan 7 Sai Gon Branch	190	Yangon Branch