

Name of Financial Institution: NBI hf.

Part I – Institution’s Information

1.1 Contact Details	
Full legal name:	NBI hf.
Trading name(s) used (if different to above):	
Corporate identification number:	471008-0280
Full address of registered office:	Street details: Austurstræti 11
	Suburb: Reykjavík
	Postal/ZIP code: 155
	Country: ICELAND
Date of incorporation/establishment:	9 October 2008
Phone (Main):	+354 410 4000
Phone (Alternative):	
Fax:	+354 410 3101
Email:	compliance@landsbanki.is
Website:	www.landsbankinn.is

Part II – Legal Form, Regulatory status and Other Details

2.1 What is the legal form of your Institution?	
<input type="checkbox"/> Public company	<input type="checkbox"/> Private company
<input checked="" type="checkbox"/> State Owned Company	<input type="checkbox"/> Other (please provide full details below)
Is your institution regulated in its banking / other activities by a financial services regulator?	
	<input checked="" type="checkbox"/> Yes - Name the regulator(s) and Registration No (if applicable) below <u>The Financial Supervisory Authority , Iceland</u>
	<input type="checkbox"/> No

2.2 Domiciliary Status and Other Information	
Does your banking license permit you to conduct financial institution related activities with citizens of, or in the local currency of, the country that issued the license?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Part III – Ownership

Answers are not required for the next four questions if the information concerned is included in the Annual Report.

3.1 Management	
The Structure and Experience of Executive Management	
Name	Chair
Gunnar Helgi Hálfðánarson	Chairman of the Board
Guðríður Ólafsdóttir	Director
Haukur Halldórsson	Director
Sigríður Hrólfsdóttir	Director
Fríðrik Pálsson	Director

3.2 Shareholders (in excess of 5%)	
Name	Size of interest
The Icelandic Government	81,3%
Landskil ehf.	18,7%

3.3 Chief Executive Officers	
Name	Chair
Ásmundur Stefánsson	CEO

Part IV – Anti Money Laundering (AML) Controls and Assessment

4.1 AML Overview	
Has your country established laws designed to prevent money laundering and terrorist financing?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is your institution subject to local AML laws/regulation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is your institution a member of a Group of companies? If yes does the Ultimate Parent entity require that all members of its Group apply common internal standards of AML controls?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.2 Polices, Practice and Procedures	
Does the AML compliance program require approval of your institution Board or a senior committee thereof?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a legal and regulatory compliance program that includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis, which has been approved by senior management of your institution?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has your institution developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions that has been approved by senior management?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In addition to inspections by the government supervisors/regulators, does your institution client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a policy prohibiting accounts/relationships with shell banks (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have policies covering relationships with politically exposed persons consistent with industry best practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have appropriate record retention procedures pursuant to applicable law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution require that its AML policies and practices be applied to all branches and subsidiaries of your institution both in the home country and in locations outside of the home country?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.3 Monitoring Controls	
Does your institution monitor the account activity of its customers to detect unusual or suspicious activity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a compliance or other control function (e.g. audit department) which reviews compliance with KYC and AML policies and procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution monitor correspondent account activity against official lists?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution monitor customer account databases for terrorist names?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4.4 Other Controls	
Does your institution train staff on KYC and AML policies and procedures?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution comply with FATF Recommendation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a dedicated Money Laundering Reporting Officer, or similar?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution provide AML training to relevant employees that include identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering involving the institution's products and services and internal policies to prevent money laundering?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
What is the frequency of AML training for staff?	At least annual
What is the frequency of testing for AML compliance by audit?	At least annual
Does your institution retain records of its training sessions including attendance records and relevant training materials used?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have policies to communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a risk focused assessment of its customer base and transactions of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

its customers?	
Does your institution apply enhanced due diligence policies and procedures in connection with higher risk clients e.g. <i>politically exposed persons</i> ?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.5 Shell Banks	
Does your institution have a physical presence, in that it carries on the business of banking at a place which is a fixed address in a jurisdiction in which it is authorized to carry on that business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have policies that prohibit dealings with Shell Banks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.6 Know Your Customer, Due Diligence and Enhanced Due Diligence	
Has your institution implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc. (for example; name, nationality, street address, telephone number, occupation, age/ date of birth, number and type of valid official identification, as well as the name of the country/state that issued it)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have a requirement to collect information regarding its customers' business activities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution collect information and assess its institutions customers' AML policies or practices?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have procedures to establish a record for each customer noting their respective identification documents and Know Your Customer Information collected at account opening?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution take steps to understand the normal and expected transactions of its customers based on its risk assessment of its customers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.7 Reportable Transactions and Prevention and Detection of Transactions with Illegal Obtained Funds	
Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have procedures to identify transactions structured to avoid large cash reporting requirements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does your institution have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

This form was completed by:

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Date:	19 February 2010