

Financial Institution Name:	
Location (Country) :	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	
2	Append a list of foreign branches which are covered	
	by this questionnaire	
3	Full Legal (Registered) Address	
"	l uli Legal (Negistereu) Address	
4	Edi Disease Projects Address (15 different form	
4	Full Primary Business Address (if different from above)	
	above)	
5	Date of Entity incorporation/establishment	
<u></u>		
6	Select type of ownership and append an ownership	
	chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	
	symbol	
6 b	Member Owned/Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
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	
ļ*	shares	
	Sidios	
	D # 5 # 5	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	
_		
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
	which operate under all OBL	
_		
9	Does the Bank have a Virtual Bank License or	
	provide services only through online channels?	
10	Name of primary financial regulator/supervisory	
	authority	
11	Provide Legal Entity Identifier (LEI) if available	
12	Provide the full legal name of the ultimate parent (if	
-	different from the Entity completing the DDQ)	
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13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	
1		
14	Select the business areas applicable to the Entity	
	1.1	
14 a	Retail Banking	
14 b	Private Banking	
14 c	Commercial Banking	
14 d	Transactional Banking	
	ű	
14 e	Investment Banking	
14 f	Financial Markets Trading	
14 g	Securities Services/Custody	
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	
14 j	Wealth Management	
14 k	Other (please explain)	
	(process support)	
<u> </u>	<u> </u>	
15	Does the Entity have a significant (10% or more)	
1	portfolio of non-resident customers or does it derive	
1	more than 10% of its revenue from non-resident	
1	customers? (Non-resident means customers primarily	
1	resident in a different jurisdiction to the location	
1		
1	where bank services are provided)	
45 :	KV mandal that is	
15 a	If Y, provide the top five countries where the non-	
1	resident customers are located.	
1	1	
1	1	
	<u> </u>	<u> </u>
16	Select the closest value:	
16 a	Number of employees	
	. ,	
16 b	Total Assets	
17	Confirm that all responses provided in the above	
1	Section are representative of all the LE's branches.	
17 -	•	
17 a	If N, clarify which questions the difference/s relate to	
1	and the branch/es that this applies to.	
1		
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L	<u> </u>	<u> </u>
18	If appropriate, provide any additional	
	information/context to the answers in this section.	
1	and anomore in this section.	
1	1	
1	1	
2 DDCD	CTS & SEDVICES	
	CTS & SERVICES	
19	Does the Entity offer the following products and	
1	services:	
19 a	Correspondent Banking	
10 1	1637	
19 a1	IfY	
19 a1a	Does the Entity offer Correspondent Banking	
Í	services to domestic banks?	
10 -15	Does the Entity allow domestic bank clients to	
19 a1b	1	
L	provide downstream relationships?	<u> </u>
19 a1c	Does the Entity have processes and procedures	
1 -	in place to identify downstream relationships with	
1	domestic banks?	
<u> </u>		
19 a1d	Does the Entity offer Correspondent Banking	
1	services to foreign banks?	
19 a1e	Does the Entity allow downstream relationships	
Jaie		
	with foreign banks?	
19 a1f	Does the Entity have processes and procedures	
l -	in place to identify downstream relationships with	
1	1 ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	
	foreign banks?	
19 a1g	Does the Entity offer Correspondent Banking	
3	services to regulated Money Services Businesses	
1		
	(MSBs)/Money Value Transfer Services (MVTSs)?	
19 a1h	Does the Entity allow downstream relationships	
1	with MSBs, MVTSs, or Payment Service Provider	
1	(PSPs)?	
L	, ,	
19 a1h1	MSBs	
19 a1h2	MVTSs	
19 a1h3	PSPs	

19 a1i	Does the Entity have processes and procedures	
	in place to identify downstream relationships with	
	MSBs /MVTSs/PSPs?	
	IVIODO /IVI V TOO/T OT 5:	
19 b	Cross-Border Bulk Cash Delivery	
19 с	Cross-Border Remittances	
19 d	Domestic Bulk Cash Delivery	
19 e	Hold Mail	-
19 f	International Cash Letter	
19 g	Low Price Securities	
19 h	Payable Through Accounts	
19 i	Payment services to non-bank entities who may	
191	1 ,	
	then offer third party payment services to their	
	customers?	
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
	II.	
19 i5	Other - Please explain	
]		
19 j	Private Banking	
19 k	Remote Deposit Capture (RDC)	
19 I	Sponsoring Private ATMs	
19 m	Stored Value Instruments	
19 n	Trade Finance	
-		=
19 o	Virtual Assets	
19 p	For each of the following please state whether you	
-	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
	11	
19 p1	Check cashing service	
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	
19 p4a	If yes, state the applicable level of due diligence	
19 p5	If you offer other services to walk-in customers	
	please provide more detail here, including	
	describing the level of due diligence.	
	accombing are rever or add unigeneer	
19 q	Other high-risk products and services identified by	
4	the Entity (please specify)	
	the Entity (please specify)	
20	Confirm that all responses provided in the above	
]	Section are representative of all the LE's branches.	
20 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the branchies that this applies to.	
21	If appropriate, provide any additional	
	information/context to the answers in this section.	
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3. AML. C	TF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum	
~ ~	AML, CTF and Sanctions standards regarding the	
]		
]	following components:	
22 a	Appointed Officer with sufficient	
22 b	Adverse Information Screening	
	Ţ.	
22 c	Beneficial Ownership	<u> </u>
22 d	Cash Reporting	
22 e	CDD	
22 f	EDD	
22 g	Independent Testing	
	Periodic Review	
22 h		
	Policies and Procedures	
22 i		
22 i 22 j	PEP Screening	
22 j	PEP Screening	
22 j 22 k	PEP Screening Risk Assessment	
22 j	PEP Screening	

22 m	Suspicious Activity Reporting	
22 m	Training and Education	
22 n	Transaction Monitoring	
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	₽
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34	Is the Entity's ABC programme applicable to:	
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b	Includes enhanced requirements regarding interaction with public officials?	
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	7
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	P P
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	

40 b		
40 6	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
42	Does the Entity provide mandatory ABC training to:	
42 a	Board and senior Committee Management	
42 b	1st Line of Defence	
42 c	2nd Line of Defence	
42 d	3rd Line of Defence	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	
42 f	Non-employed workers as appropriate (contractors/consultants)	
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	hel
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML, C	TF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
46 a	Money laundering	
46 b	Terrorist financing	
46 c	Sanctions violations	
47	Are the Entity's policies and procedures updated at least annually?	
48	Has the Entity chosen to compare its policies and procedures against:	
48 a		
40 a	U.S. Standards	
48 a1	U.S. Standards If Y, does the Entity retain a record of the results?	=
48 a1	If Y, does the Entity retain a record of the results?	
48 a1 48 b	If Y, does the Entity retain a record of the results? EU Standards	
48 a1 48 b 48 b1	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	
48 a1 48 b 48 b1 49	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous	
48 a1 48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for	
48 a1 48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks	
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks	
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks	
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for Section 311 designated entities	
48 a1 48 b 48 b1 49 49 a 49 b 49 c 49 d 49 e	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that: Prohibit the opening and keeping of anonymous and fictitious named accounts Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit accounts/relationships with shell banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	

49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	
49 n	Outline the processes for the maintenance of internal "watchlists"	
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
51	Does the Entity have record retention procedures that comply with applicable laws?	
51 a	If Y, what is the retention period?	
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML, CTI	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
	F & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 54 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client	
54 a 54 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 b 54 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 b 54 c 54 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c 54 d 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
54 a 54 a 54 b 54 c 54 d 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring	
54 a 54 b 54 c 54 d 55 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 a 54 b 54 c 54 d 55 d 55 d 55 a 55 a 55 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	
54 a 54 b 54 c 54 d 55 d 55 a 55 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence	
54 a 54 b 55 c 55 d 55 e	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	
54 a 54 b 54 c 55 d 55 c 55 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	
54 a 54 b 54 c 55 d 55 b 55 c 55 d 55 f	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News	
54 a 54 a 54 b 54 c 54 d 55 55 a 55 a 55 c 55 d 55 c 55 f 55 g 55 h 56	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 f 55 g 55 h	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	
54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.	
54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	
54 a 54 a 54 b 55 c 55 a 55 c 55 d 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 b	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 b 57 c	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	
54 a 54 a 54 b 55 c 55 a 55 b 55 c 55 d 55 b 55 c 55 d 55 f 55 c 55 d 55 f 55 g 55 h 56 a 57 a 57 a 57 a 57 c 57 d	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	
54 a 54 b 54 c 54 d 55 5 5 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 b 57 c 57 d 58	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	
54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 f 55 f 55	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	
54 a 54 b 54 c 55 d 55 c 55 d 55 c 55 d 55 c 55 d 55 f 55 c 55 d 5	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence Governance	
54 a 54 a 54 b 54 c 54 d 55 c 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 a 57 c 57 a 57 c 57 d 58 a	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed. Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	

58 e	Name Screening	
58 f	Transaction Screening	
58 g	Training and Education	
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	
59 a	If N, provide the date when the last Sanctions	
39 a	EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	
	•	
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional	
	information/context to the answers in this section.	
7. KYC, C	DD and EDD	
62	Does the Entity verify the identity of the customer?	
63	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?	
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	
64 b	Expected activity	
64 c	Nature of business/employment	
64 d	Ownership structure	
64 e	Product usage	
64 f	Purpose and nature of relationship	
64 g	Source of funds	
64 h	Source of wealth	
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	
65 a1	Are ultimate beneficial owners verified?	
65 b	Authorised signatories (where applicable)	
65 c	Key controllers	
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	-
67 a	receiving a risk classification? If Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	
67 a2	Geography	
67 a3	Business Type/Industry	
67 a4	Legal Entity type	
67 a5	Adverse Information	
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	
68 a	If Y, is this at:	
68 a1	Onboarding	
68 a2	KYC renewal	
68 a3	Trigger event	
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	
69 a	If Y, is this at:	
69 a1	Onboarding	
69 a2	KYC renewal	

	1	
69 a3	Trigger event	
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	
71 a2	KYC renewal	
71 a3	Trigger event	
72	What is the method used by the Entity to screen PEPs?	=
73	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?	
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	
74 a	If yes, select all that apply:	
74 a1	Less than one year	
74 a2	1 – 2 years	
74 a3	3 – 4 years	
74 a4	5 years or more	
74 a5	Trigger-based or perpetual monitoring reviews	
74 a6	Other (Please specify)	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	
76	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?	
76 a	Arms, defence, military	
76 b	Respondent Banks	
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	
76 d	Extractive industries	
76 e	Gambling customers	
76 f	General Trading Companies	
76 g	Marijuana-related Entities	
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	
76 k	Non-resident customers	
761	Nuclear power	
76 m	Payment Service Providers	
76 n	PEPs PEPs	
76 o	PEP Close Associates	
76 p	PEP Related	
76 q	Precious metals and stones	
76 r	Red light businesses/Adult entertainment	=
76 s	Regulated charities	
76 t	Shell banks	
76 u	Travel and Tour Companies	
76 v	Unregulated charities	
76 w	Used Car Dealers	
76 x	Virtual Asset Service Providers	
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	

70 -	If N in all and a substantial and it is a manufacture of	
78 a	If Y indicate who provides the approval:	
79	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	
81 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONIT	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
84	What is the method used by the Entity to monitor transactions for suspicious activities?	■
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	
84 b2	When was the tool last updated?	
84 b3	When was the automated Transaction Monitoring application last calibrated?	
85	Does the Entity have regulatory requirements to report suspicious transactions?	
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
91	If appropriate, provide any additional information/context to the answers in this section.	
Q DAVME	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	

	T=	
93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	
93 b	Local Regulations	
93 b1	If Y, specify the regulation	
93 D1	if Y, specify the regulation	
93 с	If N, explain	
	,	
94	Does the Entity have controls to support the inclusion	
	of required and accurate originator information in	
	cross border payment messages?	
95	Does the Entity have controls to support the inclusion	
	of required beneficiary information cross-border	
	payment messages?	
	† †	
95 a	If Y, does the Entity have procedures to include	
	beneficiary address including country in cross	
	border payments?	
96	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	
96 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	and the braneries that this applies to.	
97	If appropriate, provide any additional	
	information/context to the answers in this section.	
10. SANC		
98	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?	
99	Does the Entity have policies, procedures, or other	
1	controls reasonably designed to prevent the use of	
	another entity's accounts or services in a manner	
	causing the other entity to violate sanctions	
	prohibitions applicable to the other entity (including	
	prohibitions within the other entity's local jurisdiction)?	
100	Does the Entity have policies, procedures or other	
1	controls reasonably designed to prohibit and/or	
1	detect actions taken to evade applicable sanctions	
1	prohibitions, such as stripping, or the resubmission	
1	and/or masking, of sanctions relevant information in	
	cross border transactions?	
101	Does the Entity screen its customers, including	
1	beneficial ownership information collected by the	
1	Entity, during onboarding and regularly thereafter	
	against Sanctions Lists?	
	,	
102	What is the method used by the Entity for sanctions	
	screening?	F
102 a	If 'automated' or 'both automated and manual'	
	selected:	
102 a1	Are internal system of vendor-sourced tools used?	
102 a1	If a 'vendor-sourced tool' or 'both' selected, what	
102 010	is the name of the vendor/tool?	
	is the figure of the vehicle/tool:	
1		
102 a2	When did you last test the effectiveness (of finding	
1	true matches) and completeness (lack of missing	
1	data) of the matching configuration of the	
1	automated tool? (If 'Other' please explain in	
1	Question 110)	
100	,	
103	Does the Entity screen all sanctions relevant data,	
1	including at a minimum, entity and location	=
1	information, contained in cross border transactions	
1	against Sanctions Lists?	
104	What is the method used by the Entity?	
		<u>l</u>

programme to ensure that complete data for all transactions are subject to an action sure sure of the Sanctions Lists used by the Entity in its sanctions sure receiving? 106 a Select the Sanctions Lists used by the Entity in its sanctions sorewing processes: 106 a Consolidated United Nations Security Council Sendon List (NN) 106 b United States Department of the Treasury's Office of Office			
in another spreading processes: a Considerated United Nations Security Council Sanctions List (IVN) 106 b United States Department of the Treasury's Office of Foreign Assets Control (CFAC) 107 Company Assets Control (CFAC) 108 c Office of Financial Sanctions Implementation HMT (CFSI) 109 c Lists maintained by other G7 member countries 106 f European Union Consolidated List (EU) 107 When regulatory authorities make updates to their Sanctions list, how many business days to fever entity updates their active manual andor automated screening systems against. 107 a Customer Data 108 c Customer Data 109 b Transactions 109 b Transactions 109 b Transactions 109 c Control that a response against which UN OFAC, OFS, EU of 07 member countries have enabled in countries/regions against which UN OFAC, OFS, EU of 07 member countries have enabled comprehensing principles against which UN OFAC, OFS, EU of 07 member countries have enabled comprehensing principles against which UN OFAC, OFS, EU of 07 member countries have enabled comprehensing principles against which UN OFAC, OFS, EU of 07 member countries have enabled comprehensing principles against which UN OFAC, OFS, EU of 07 member countries have enabled on a district of the d	105	programme to ensure that complete data for all	
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Information/context to the answers in this section.	115 a		
Information/context to the answers in this section.			
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In addition to inspections by the government	13. AUDIT		
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123 Does the internal audit function or other independent third party cover the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filling 123 h Technology 123 i Transaction Monitoring 123 i Transaction Screening including for sanctions 123 k Transing & Education 123 l Transaction Screening including for sanctions 123 k Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to. 126 If appropriate, provide any additional information/context to the answers in this section. 127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible	122 a	Internal Audit Department	
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127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible	14. FRAL	JD	
		Does the Entity have policies in place addressing fraud risk?	
	128		

129	Does the Entity have real time monitoring to detect	
	fraud?	
130	Do the Entity's processes include gathering	
	additional information to support its fraud controls, for	
	example: IP address, GPS location, and/or device ID	?
131	Confirm that all responses provided in the above	
	section are representative of all the LE's branches	
131 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
132	If appropriate, provide any additional	
	information/context to the answers in this section.	
Daalass	tion Statement	
Deciara	tion Statement	
Wolfsbera	Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration	n Statement (To be signed by Global Head of Correspondent Ba	nking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
	n Statement (To be signed by Global Head of Correspondent Ba by Laundering, Chief Compliance Officer, Global Head of Financi	nking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of al Crimes Compliance OR equivalent)
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