Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

## the Wolfsberg Group

Financial Institution Name: Banca UBAE S.p.A.
Location (Country) :

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
	& OWNERSHIP	
1	Full Legal Name	
	i ur Legarivanie	BANCA UBAE S.P.A.
2	Append a list of foreign branches which are covered by this questionnaire	BANCA UBAE S.P.A. HAS ONE BRANCH LOCATED IN MILAN
3	Full Legal (Registered) Address	VIA QUINTINO SELLA 2, 00187 ROME ITALY
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	03/11/1972
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No No
6 c	Government or State Owned by 25% or more	No No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	80,15% Libyan Foreign Bank
7	% of the Entity's lotal 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	Name of primary financial regulator/supervisory authority	Bank of Italy
11	Provide Legal Entity Identifier (LEI) if available	81560009794D6B08F83
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13			
4	Jurisdiction of licensing authority and regulator of		
	ultimate parent		
14	Select the business areas applicable to the Entity		-
14 a	Retail Banking	No F	
14 b	Private Banking		
14 c	Commercial Banking		X
		No C	
14 d	Transactional Banking		-
14 e	Investment Banking	No	
14 f	Financial Markets Trading	No	
14 g	Securities Services/Custody	No	
14 h	Broker/Dealer		
14 i	Multilateral Development Bank		
14 j	Wealth Management	·	
14 k	Other (please explain)		_
14 K	Outer (piease explain)	Corporate trade banking; oil& energy financing; forex/freasury management/capital markets operations; search of selection of business counterparties (bank or large corporates) in connection with trade activities	on
15	Does the Entity have a significant (10% or more)		=
	portfolio of non-resident customers or does it derive		
	more than 10% of its revenue from non-resident		
	customers? (Non-resident means customers primarily	Yes	¥
	resident in a different jurisdiction to the location		
	where bank services are provided)		
10			
15 a	If Y, provide the top five countries where the non-	LIBYA , BANGLADESH, TURKEY AND SWITZERLAND	
	resident customers are located.		
16	Select the closest value:		
16 a	Number of employees	51-200	_
16 b	Total Assets		=
17		Greater than \$500 million	
17	Confirm that all responses provided in the above	Yes	
	Section are representative of all the LE's branches.		_
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
18	If appropriate, provide any additional information/context to the answers in this section.		
2. PRODU	ICTS & SERVICES		
2. PRODU	ICTS & SERVICES Does the Entity offer the following products and		
19	Does the Entity offer the following products and services:	Yes	
19 19 a	Does the Entity offer the following products and services:  Correspondent Banking	Yes	
19 19 a 19 a1	Does the Entity offer the following products and services:  Correspondent Banking  If Y	Yes	
19 19 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	Yes	<u> </u>
19 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking		- -
19 19 a 19 a1 19 a1a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	Yes	- - -
19 19 a 19 a1 19 a1 a	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with	Yes Ves Ves	- -
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking	Yes Ves Yes	- - -
19 a 19 a 19 a1 19 a1a 19 a1b	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?	Yes Ves Yes	•
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity aflow downstream relationships with foreign banks?  Does the Entity aflow downstream relationships with foreign banks?	Yes E	•
19 a 19 a 1	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity affow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Yes In the second of the secon	•
19 a 19 a 19 a 19 a 10 a 11 a 10 a 10 a 10 a 10 a 10 a 10	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Yes In the second of the secon	•
19 a 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1d 9 a1f 9 a1f 9 a1f	Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Yes	•

19 c 19 d 19 d 19 e 1 19 f 19 f 19 f 19 f 19 f 19 i 6 6 79 i 19 i 1	MSBs /MVTSs/PSPs?  Cross-Border Bulk Cash Delivery Cross-Border Remittances Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No N
19 c	Cross-Border Remittances  Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforns Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No N
19 d   1   19 e   1   19 f   19 f   19 h   16   19 i   19 p   19 p   19 p   2	Domestic Bulk Cash Delivery Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No Please select Please select Presses select No
19 e	Hold Mail International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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 If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Please select Please select Please select Please select  No No No No No No Please select  No Please select No Please select No
19 f 19 g 19 h 19 i	International Cash Letter Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Please select Please select Please select Please select  No No No No No No Please select  No Please select No Please select No
19 g	Low Price Securities Payable Through Accounts Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Please select Please select Please select Please select  No No No No No No Please select  No Please select No Please select No
19 h	Payable Through Accounts  Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Please select Please select Please select Please select  No No No No No No Please select  No Please select No Please select No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?  If Y , please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Please select Please select Please select Please select  No No No No No No Please select  No Please select No Please select No
19 i1 19 i2 19 i3 19 i4 19 i5 19 i4 19 i5 19 i 19 j F 19 k F 19 l S 19 m	then offer third party payment services to their customers?  If Y, please select all that apply below? Third Party Payment Service Providers Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	Please select Please select Please select  No No No No No No Pess No Please select No Please select No
19 i2 19 i3 19 i4 19 i5  19 j 19 k F 19 l 19 m S 19 m 19 n 19 p	Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs) eCommerce Platforms  Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service  If yes, state the applicable level of due diligence Wire transfers  If yes, state the applicable level of due diligence Foreign currency conversion  If yes, state the applicable level of due diligence	Please select  No No No No No No No No No Pess No
19 i2 19 i3 19 i4 19 i5 19 j 19 k F 19 l 5 19 l 5 19 n 19 n 19 p	Third Party Payment Service Providers  Virtual Asset Service Providers (VASPs) eCommerce Platforms  Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service  If yes, state the applicable level of due diligence Wire transfers  If yes, state the applicable level of due diligence Foreign currency conversion  If yes, state the applicable level of due diligence	Please select  No No No No No No No No No Pess No
19 i3 19 i4 19 i4 19 i5  19 j 19 k 19 l 9 l 19 m 9 l 19 m 19 p	Virtual Asset Service Providers (VASPs) eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	Please select  No No No No No No No No No Pess No
19 i4 19 i5  19 j 19 k F 19 l S 19 m S 19 n T 19 o V 19 p	eCommerce Platforms Other - Please explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No No No No No No Pes No Please select No Please select No
19 i5  19 j F 19 k F 19 l S 19 m S 19 n T 19 o V 19 p 19 p1 19 p1 19 p2 19 p2 19 p2 19 p3 19 p3 19 p4 19 p4 19 p5	Other - Pfease explain  Private Banking Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No No No No Ves No Please select No Please select No
19 k F F 19 I S 19 I S 19 m S 19 n T 19 o N N 19 p F 19 p 19 p 19 p 2 19 p 2 19 p 3 19 p 3 19 p 4 19 p 4 19 p 5 19 p 5 19 p 5 19 p 6 19 p 7 19	Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No No Yes No No Please select No Please select No
19 k F F 19 I S 19 I S 19 m S 19 n T 19 o N N 19 p F 19 p 19 p 19 p 2 19 p 2 19 p 2 19 p 3 19 p 3 19 p 4 19 p 4 19 p 5 19 p 5 19 p 6 19 p 7 19	Remote Deposit Capture (RDC) Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No No Yes No No Please select No Please select No
19 I S 19 m S 19 m S 19 n T 19 o V 19 p F G G G G G G G G G G G G G G G G G G	Sponsoring Private ATMs Stored Value Instruments Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No No Yes No No Please select No Please select No
19 m S 19 n T 19 o V 19 p F Ca 19 p1 19 p1 19 p1 19 p2 19 p2 19 p2 19 p3 19 p3 19 p4 19 p4 19 p5	Stored Value Instruments  Trade Finance  Virtual Assets  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:  Check cashing service  If yes, state the applicable level of due diligence Wire transfers  If yes, state the applicable level of due diligence Foreign currency conversion  If yes, state the applicable level of due diligence	No Yes No No Please select No Please select No
19 n T 19 o N 19 p F C 2 a 19 p1 19 p1 19 p2 19 p2 19 p3 19 p4 19 p4 19 p5 19 p5	Trade Finance Virtual Assets 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: Check cashing service If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	Yes No No Please select No Please select No
19 o V 19 p 19 p1 19 p1 19 p1 19 p2 19 p2 19 p2 19 p3 19 p4 19 p4 19 p5 19 p5	Virtual Assets  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:  Check cashing service  If yes, state the applicable level of due diligence  Wire transfers  If yes, state the applicable level of due diligence  Foreign currency conversion  If yes, state the applicable level of due diligence	No Please select No Please select No Please select
19 p  19 p1  19 p1  19 p2  19 p2  19 p3  19 p3  19 p4  19 p4  19 p5  19 q	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:  Check cashing service  If yes, state the applicable level of due diligence Wire transfers  If yes, state the applicable level of due diligence Foreign currency conversion  If yes, state the applicable level of due diligence	No Please select No Please select No
19 p1 19 p1a 19 p2 19 p2 19 p2a 19 p3a 19 p3a 19 p4 19 p4a 19 p5	Check cashing service  If yes, state the applicable level of due diligence  Wire transfers  If yes, state the applicable level of due diligence  Foreign currency conversion  If yes, state the applicable level of due diligence	Please select No Please select No No Please select
19 p1a 19 p2 19 p2 19 p2a 19 p3a 19 p3a 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	Please select No Please select No No Please select
19 p2 19 p2a 19 p3 19 p3 19 p4 19 p4 19 p4a 19 p5	Wire transfers If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	No Please select
19 p2a 19 p3 19 p3a 19 p4 19 p4 19 p5	If yes, state the applicable level of due diligence Foreign currency conversion If yes, state the applicable level of due diligence	Please select No
19 p3 19 p3a 19 p4 19 p4 19 p4a 19 p5	Foreign currency conversion If yes, state the applicable level of due diligence	No
19 p3a 19 p4 19 p4 19 p4a 19 p5	If yes, state the applicable level of due diligence	
19 p4 19 p4a 19 p5		I Diagon colock
19 p4a 19 p5		Please select
19 p5	Sale of Monetary Instruments	No
19 q C	If yes, state the applicable level of due diligence	Please select
	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
	Other high-risk products and services identified by the Entity (please specify)	N/A
	onfirm that all responses provided in the above ection are representative of all the LE's branches.	Yes
	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	appropriale, provide any additional formation/context to the answers in this section.	
3. AML. CTF	& SANCTIONS PROGRAMME	
ŽŽ Do	oes the Entity have a programme that sets minimum ML, CTF and Sanctions standards regarding the llowing components:	
22 a A	Appointed Officer with sufficient experience/expertise	Yes
		Yes
		Yes
	CDD	
		Yes
		Yes
		Yes
22 h P	Periodic Review	Yes
22 i P		Yes
		Yes
	LF Scieening	Yes
22 i S		

100-	Constitution A C 1 D	To
22 m 22 n	Suspicious Activity Reporting	Yes
22 n	Training and Education Transaction Monitoring	Yes Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
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.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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. ANT	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?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibils 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,	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	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)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
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?	Yes
<b>\$0</b>	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
10 a	Polential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b			
	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	-
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	-
40 đ	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	-
41	Does the Enlity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	
42 c	2nd Line of Defence	Yes	=
42 d	3rd Line of Defence	Yes	=
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No	T
42 f	Non-employed workers as appropriate (contractors/consultants)	Yes	-
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	
44	Confirm that all responses provided in the above	Yes	
44 a	Section are representative of all the LE's branches  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 AMI C	CTF & SANCTIONS POLICIES & PROCEDURES		
46	Has the Entity documented policies and procedures		
40	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a			
40.1	Money laundering	Yes	
46 b	Money laundering Terrorist financing	Yes Yes	昌
46 b			
	Terrorist financing	Yes	
46 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at	Yes Yes	
46 c 47	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and	Yes Yes	
46 c 47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards	Yes Yes Yes	
46 c 47 48	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against:	Yes Yes Yes Yes	
46 c 47 48 48 a 48 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards If Y, does the Entity retain a record of the results? EU Standards	Yes Yes Yes Yes Yes Yes Yes Yes	
46 c 47 48 48 a 48 a 48 a 48 b 48 b 48 b 49	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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	Yes	
46 c 47 48 48 a 48 a 48 b 48 b 48 b 49 a	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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	Yes	
46 c 47 48 48 a 48 a 48 a 1 48 b 48 b 1 49 49 a 49 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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	Yes	
46 c 47 48 48 a 48 a 48 a 1 48 b 48 b 1 49 a 49 b	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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 dealing with another entity that provides	Yes	
46 c 47 48 48 a 48 a 48 a 1 48 b 48 b 1 49 a 49 a 49 c 49 d	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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 dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with other entities that provide banking services to unlicensed banks Prohibit dealing with another entity that provides services to shell banks Prohibit opening and keeping of accounts for	Yes	
46 c 47 48 48 a 48 a1 48 b 48 b1 49 49 a 49 c 49 c	Terrorist financing Sanctions violations Are the Entity's policies and procedures updated at least annually? Has the Entity chosen to compare its policies and procedures against: U.S. Standards 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	Yes	

49 î			
	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes	•
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes	-
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes	
491	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	Yes	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes	•
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes	*
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes	-
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	-
51 a	If Y, what is the retention period?	5 years or more	-
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	同
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.		
C 4111 O	TE A A MOTIONA DISK A SAFONIENT		
54 54	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
54 a	Client	Yes	
641			
54 b	Product	Yes	
54 b			
	Product	Yes	
54 c	Product Channel	Yes Yes	
54 c 54 d	Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yes	
54 c 54 d 55	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	Yes Yes Yes	
54 c 54 d 55 55 a 55 b 55 c	Product Channel Geography Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below: Transaction Monitoring Customer Due Diligence PEP Identification	Yes Yes Yes Yes	RODORDO
54 c 54 d 55 55 a 55 a 55 b 55 c	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	Yes Yes Yes Yes Yes Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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	Yes Yes Yes Yes Yes Yes Yes Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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	Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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	Yes	
54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	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	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 f 55 f 55 f	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	Yes	•
54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	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	Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 6 56 a	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.	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 f 55 7 57	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:	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a	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	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 a 57 57 a 57 c	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	Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	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	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 6 56 a 57 57 a 57 c 57 d 58	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	Yes	
54 c 54 d 55 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56	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:	Yes	
54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 f 55 7 57 a 57 c 57 d 58 58	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	Yes	

58 f 58 g 59 H 16 59 a 60 C Si 60 a 61 If In 7. KYC, CDD 62 D 63 D 64 W 7. KYC S 64 B 64 C 64 C 64 C 64 C 64 C 64 C 65	Transaction Screening Training and Education Has the Entity's Sanctions EWRA been completed in the last 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  Confirm that all responses provided in the above section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional nformation/context to the answers in this section.  D and EDD  Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of inboarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usagg  Purpose and nature of relationship  Source of funds  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership  Are ultimate beneficial owners verified?	Yes Yes Yes Yes  Yes  Yes  Yes  Yes  Ye
59 H H H H H H H H H H H H H H H H H H H	Has the Entity's Sanctions EWRA been completed in the last 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  Confirm that all responses provided in the above Section are representative of all the LE's branches of the confirmation of the section are representative of all the LE's branches.  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.  Do and EDD  Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when conducting or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
60 CS SS 60 a	he last 12 months?  If N, provide the date when the last Sanctions EWRA was completed.  Confirm that all responses provided in the above Section are representative of all the LE's branches  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.  Does the Entity verify the identity of the customer?  On the Entity's policies and procedures set out when DD must be completed, e.g. at the time of inboarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes  Yes  Yes  Yes  Yes  Yes  Yes  Yes
60 C Si 60 a  61 If in  7. KYC, CDD 62 Do 63 Do 64 W re 64 a G 64 b E 64 c P 64 d G 64 c P 64 d G 65 a C 65 a C 65 a C 65 b A 65 c P	EWRA was completed.  Confirm that all responses provided in the above Section are representative of all the LE's branches 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.  D and EDD  Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of inboarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
60 a  61 If in  7. KYC, CDD  62 Dc  63 Dc  64 W  re  64 a  64 b  64 c  64 c  64 c  64 c  64 c  64 c  65 a  65 a  65 a  65 c  65 c	Section are representative of all the LE's branches  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.  Do and EDD  Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when DD must be completed, e.g. at the time of inboarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
61 If in If in If	and the branch/es that this applies to.  f appropriate, provide any additional information/context to the answers in this section.  D and EDD  Does the Entity verify the identity of the customer?  To the Entity's policies and procedures set out when into additionally the interest of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
7. KYC, CDD 62	O and EDD Does the Entity verify the identity of the customer? Do the Entity's policies and procedures set out when EDD must be completed, e.g. at the time of inboarding or within 30 days? Which of the following does the Entity gather and etain when conducting CDD? Select all that apply: Customer identification Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes
62 De 63 C C C C C C C C C C C C C C C C C C	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when DD must be completed, e.g., at the time of inhoarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
62 De 63 C C C C C C C C C C C C C C C C C C	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when DD must be completed, e.g., at the time of inhoarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
64 W re 64 a (664 b file) 64 d (664 c file) 64 d (664 c file) 64 d (664 c file) 65 d file) 65 d file 65 a file 65 a file 65 b file 65 c	CDD must be completed, e.g. at the time of inboarding or within 30 days?  Which of the following does the Entity gather and etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
re 64 a 64 b F 64 c F 64 d 66 b F 64 g S 64 h S 65 a C F 65 c F 6	etain when conducting CDD? Select all that apply:  Customer identification  Expected activity  Nature of business/employment  Ownership structure  Product usage  Purpose and nature of relationship  Source of funds  Source of wealth  re each of the following identified:  Ultimate beneficial ownership	Yes
64 b	Expected activity Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes
64 c	Nature of business/employment Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes
64 d (64 e F F 64 f F 64 g S 65 Ar 65 a 1 65 b F 65 c F 65 c	Ownership structure Product usage Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes Yes Yes Yes Yes Yes Yes Yes
64 e F 64 f F 64 g S 64 h S 65 Ar 65 a 1 65 b	Product usage Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes Yes Yes Yes Yes Yes Yes
64 f F 64 g S 65 h C 65 a C 65 a C 65 b C 65 c F	Purpose and nature of relationship Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes Yes Yes Yes Yes
64 g S 64 h S 65 Ar 65 a U 65 a1 65 b / 65 c H	Source of funds Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes Yes Yes
64 h S 65 An 65 a U 65 a1 65 b / 65 c H	Source of wealth re each of the following identified: Ultimate beneficial ownership	Yes Yes
65 Ar. 65 a U 65 a1 65 b A 65 c P	re each of the following identified: Ultimate beneficial ownership	Yes
65 a U 65 a1 65 b / 65 c H	Ultimate beneficial ownership	
65 a1 65 b / 65 c k		
65 b / 65 c F		
65 c	Authorised signatories (where applicable)	Yes Yes
		Yes Yes
ina di (		Yes
66 W	/hat is the Entity's minimum (lowest) threshold	25%
	oes the due diligence process result in customers ceiving a risk classification?	Yes
	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1		Yes
67 a2		Yes
67 a3	Business Type/Industry	Yes
67 a4 67 a5	Legal Entity type	Yes
67 a6	Adverse Information Other (specify)	Yes
ра	art or your Kit's process?	Yes
	If Y, is this at:	
68 a1		Yes
68 a2		Yes
68 a3		Yes
68 a4a	Other  If yes, please specify "Other"	No
scr Ne	pes the Entity have a risk based approach to reening customers for Adverse Media/Negative ews?	Yes
		Yes
vv a i		

69 a3	Trigger event	Yes	
70	What is the method used by the Entity to screen for	res	-
	Adverse Media/Negative News?	Combination of automated and manual	*
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	Yes	
71 a2	KYC renewal	Yes	言
71 a3	Trigger event	Yes	=
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual	T
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether	Yes	-
74	Ihey are PEPs, or controlled by PEPs?  Is KYC renewed at defined frequencies based on risk	Yes	-
	rating (Periodic Reviews)?		
74 a	If yes, select all that apply:		
74 a1	Less than one year	No	
74 a2	1 – 2 years	Yes	
74 a3	3 – 4 years	Yes	
74 a4	5 years or more	Yes	Y
74 a5	Trigger-based or perpetual monitoring reviews	Yes	Y
74 a6	Other (Please specify)	N/A	
75	Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes	-
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	Prohibited	
76 b	Respondent Banks	Always subject to EDD	<b>A</b>
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes	
76 c	Embassies/Consulates	Always subject to EDD	₹
76 d	Extraclive industries	Always subject to EDD	v
76 e	Gambling customers	Prohibited	
76 f	General Trading Companies	Always subject to EDD	<b>F</b> 4
76 g	Marijuana-related Entities	Do not have this category of customer or industry	
76 h	MSB/MVTS customers	Prohibited	<b>L</b> A
76 i	Non-account customers	Do not have this category of customer or industry	V
76 j	Non-Government Organisations	Prohibited	NZ
76 k	Non-resident customers		
		Always subject to EDD	
76 I	Nuclear power	Do not have this category of customer or industry	M
76 m	Payment Service Providers	Prohibited	V
76 n	PEPs	Always subject to EDD	V
76 o	PEP Close Associates	Always subject to EDD	
76 p	PEP Related	Always subject to EDD	1
76 q	Precious metals and stones	Always subject to EDD	¥
76 r	Red light businesses/Adult entertainment		
		Do not have this category of customer or industry	
76 s	Regulated charities	Prohibited	¥
76 t	Shell banks	Prohibited	Y
76 u	Travel and Tour Companies	Always subject to EDD	Y
76 v	Unregulated charities	Prohibited	1
76 w	Used Car Dealers	Always subject to EDD	v
76 x	Virtual Asset Service Providers	Prohibited	
76 y	Other (specify)	1 Totalited	
77	If restricted, provide details of the restriction		
78	Does EDD require senior business management and/ or compliance approval?	Yes	

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for	DOM .
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	Yes
31	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
31 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
32	If appropriate, provide any additional information/context to the answers in this section,	
B. MONI	FORING & REPORTING	
13	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
14	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
34 a	If manual or combination selected, specify what type of transactions are monitored manually	in case of transactions that involve high-risk countries
14 Ь	If automated or combination selected, are internal system or vendor-sourced tools used?	Vendor-sourced tools
4 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/lool?	Fast check and Accuity on line Compliance
14 b2	When was the tool last updated?	<1 year
4 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
15	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
5 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
6	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
7	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
8	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
9	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
0	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes ▼
0 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
1	lf appropriate, provide any additional information/context to the answers in this section.	
PAYME	INT TRANSPARENCY	
2	Does the Entity adhere to the Wolfsberg Group	
	Payment Transparency Standards?	Yes

processes to complay with and have controls in place to ensure compliance with the controls in place to ensure compliance with the control of	93	Does the Entity have policies, procedures and	
3 a FAT Recommendation 16 Yes 3 b Local Regulations 3 b Local Regulations 4 K Yes 3 b Local Regulations 5 K Yes 5 Local Regulations 6 K Yes 5 Local Regulations 6 K Yes 5 Local Regulations 7 Regulation 2015/847 on information accompanying transfers of funds 7 Regulation 2015/847 on information accompanying transfers of funds 8 R Yes 9 Local Regulation Security Securi	33		
33 bt   Local Regulations   Yes			
33 bt   Local Regulations   Yes	93 a	FATE Recommendation 16	Voc
### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompanying transfers of funds  ### Billion 2015/847 on information accompany			
93 c If N, explain  94 Ose the Shifty have controls to support the indusion of required and assumite and industrial manages?  95 a Does the Entity have procedures to support the indusion 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 a If Y, does the Entity have procedures to include beneficiary address including country in cross-border payments?  97 a If S, darfy which questions the difference field to and the branches that this applies to.  98 a If N, darfy which questions the difference field to and the branches that this applies to.  10. SANCTIONS  98 Date the Entity have a Sanctions Policy approved by management regarding compliance with saccions leve applicable to the Entity, including with report to its business conducted with, or through accounts held at foreign financial institutions?  99 Date the Entity have policides, procedures, or other controls maximally including with report to use of machine entity's accounts or entitle in use of another entity's accounts are entitled to the entity face or other controls maximally designed to provent the use of another entity's accounts are entitled to the entity in the other entity for distingtion?  100 Does the Entity have policides, procedures, or other controls associately designed to provide the use of morbite entity's accounts are entitled to the entity for distingtion or other controls associately designed to provide the use of morbite entity's accounts are entitled to the entity for distingtion or distingtion and required to provent the use of morbite entity's accounts are entitled and the entity's provide and peritable to the entity for distingtion or distingtion			
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screening?    Both Automated and Manual	101	beneficial ownership information collected by the Entity, during onboarding and regularly thereafter	Yes
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including at a minimum, entity and location information, contained in cross border transactions	102 a2	true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	<1 year
	03	including at a minimum, entity and location	Yes
04 What is the method used by the Entity? Combination of automated and manual	04	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes	V
106	Select the Sanctions Lists used by the Entity in its		-
106 a	sanctions screening processes:  Consolidated United Nations Security Council	Used for screening customers and beneficial owners and for fillering transactional data	<b>-</b>
106 b	Sanctions List (UN) United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data	-
106 c	Foreign Assets Control (OFAC)  Office of Financial Sanctions Implementation HMT		
106 d	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	
106 a	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 f	Lists maintained by other G7 member countries  Other (specify)	Used for screening customers and beneficial owners and for filtering transactional data  N/A	
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:		
107 a	Customer Data	Same day to 2 business days	
107 b	Transactions	Same day to 2 business days	
108	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	-
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
109 а	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
110	If appropriate, provide any additional information/context to the answers in this section,		
	ING & EDUCATION		
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	-
111 6	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	¥
111 c	Internal policies for controlling money laundering terrorist financing and sanctions violations	Yes	
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	•
111 e	Conduct and Culture	Yes	
111 f	Fraud	Yes	
112	Is the above mandatory training provided to:		
112 a	Board and Senior Committee Management	Yes	
12 b	1st Line of Defence	Yes	
112 c	2nd Line of Defence	Yes	Y
112 d	3rd Line of Defence	Yes	
112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable	
112 f	Non-employed workers (contractors/consultants)	Yes	
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes	-
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes	-
14 a	If Y, how frequently is training delivered?	Annually	
15	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes	
		t/i	

Fraud and Sanctions programme by the following:  122 a Internal Audit Department Yearly 123 b External Third Party 124 b External Third Party 125 cose the Internal audit function or other independent third party cover the following areas: 126 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 127 b Enterprise Wide Risk Assessment 128 c Governance 129 c Rovernance 129 c Name Screening & List Management 129 c Name Screening & List Management Information 120 c Suspicious Activity Filing 121 c Yes 122 d Suspicious Activity Filing 122 c Suspicious Activity Filing 123 c Suspicious Activity Filing 124 c Transaction Screening Including for sanctions 125 c Training & Education 126 c Confirm internal & external audit Iracked to completion and assessed for adequacy and completeness? 127 c Confirm that all responses provided in the above section are representative of alt the LE's branches 125 c Confirm that all responses provided in the above section are representative of alt the LE's branches 126 c If appropriate, provide any additional information/context to the answers in this section, 127 c Does the Entity have policies in place addressing froud risk? 128 c TRAND 129 c TRANSCORD			
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Does the Entity have a program wide risk based Caulay Assurance programmer for financial crime (spaperate from his independent Audit function)?	42 OHALE	TV A COLID A NICE /COMPLIANCE TESTING	
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External Third Party   Yearty   Yearty   Yearty   Yearty	122		
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 c RYC(CDD/EDD and underlying methodologies  124 Yes  125 Reporting/Metrics & Management  126 Yes  127 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  126 Confirm that all responses provided in the above section are representative of all the LEs branches  127 If (Alariy which questions the difference/s relate to and the branch/es that this applies to.  128 If (appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have a dedicated learn responsible  128 Does the Entity have a dedicated learn responsible  129 Does the Entity have a dedicated learn responsible  120 Does the Entity have a dedicated learn responsible  121 Does the Entity have a dedicated learn responsible  122 Does the Entity have a dedicated learn responsible	122 a	Internal Audit Department	Yearly
third party cover the following areas:    123 a			Yearly
procedures Yes  Enterprise Wide Risk Assessment Yes  Governance  Yes  123 c Governance  Yes  123 d KYC/CDD/EDD and underlying methodologies Yes  123 e Name Screening & List Management Yes  Reporting/Metrics & Management Information Yes  123 f Reporting/Metrics & Management Information Yes  123 g Suspicious Activity Filing Yes  123 n Tennology Yes  123 i Transaction Monitoring Yes  123 i Transaction Monitoring Yes  123 i Transaction Screening including for sanctions Yes  123 i Transaction Screening including for sanctions Yes  124 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 policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible Version and the branch/se that this applies to Version and Versi	123	third party cover the following areas:	
123 g   Suspicious Activity Filing   Yes		procedures	
123 g   Suspicious Activity Filing   Yes			Yes
123 g   Suspicious Activity Filing   Yes			Yes
123 g   Suspicious Activity Filing   Yes			Yes
123 g   Suspicious Activity Filing   Yes			Vos
Transaction Monitoring Yes Transaction Screening including for sanctions Yes Training & Education Yes  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches  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.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.			Yes
Transaction Monitoring Yes Transaction Screening including for sanctions Yes Training & Education Yes  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? Confirm that all responses provided in the above section are representative of all the LE's branches  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.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	123 h		Yes
123 k Training & Education Yes  124 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 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	123 [	Transaction Monitoring	Yes
Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  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.  A. FRAUD  Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible	123 ]	Transaction Screening including for sanctions	Yes
Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  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.  If appropriate, provide any additional information/context to the answers in this section.  Does the Entity have policies in place addressing fraud risk?  Pes  Yes  Yes  Yes	123 k	Training & Education	Yes
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 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	123 [	Other (specify)	
section are representative of all the LE's branches  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.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.	124	tracked to completion and assessed for adequacy	Yes
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	125		Yes
information/context to the answers in this section.  4. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	125 a		
Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible  Does the Entity have a dedicated team responsible	126		
Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible  Does the Entity have a dedicated team responsible	4. FRAU	D	
	127	Does the Entity have policies in place addressing	Yes
	128		Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
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?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
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.	
Declaration Statement  Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)  Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
The Financia	o remain in full compliance with all applicable financial crime laws	ion name) is fully committed to the fight against financial crime and makes s, regulations and standards in all of the jurisdictions in which it does business and holds accounts. ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
	Institution further certifies it complies with / is working to compl on provided in this Wolfsberg CBDDQ will be kept current and v	ly with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles, will be updated no less frequently than every eighteen months.
The Financial	Institution commits to file accurate supplemental information or	a timely basis.
		of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that my honest belief, and that I am authorised to execute this declaration on behalf of the Financial
I, Annabella	DDQ are complete and correct to my honest belief, and that I a	ivalent), certify that I have read and understood this declaration, that the answers provided in this am authorised to execute this declaration on behalf of the Financial Institution.
(Signature & Date)		