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

## the Wolfsberg Group

Financial Institution Name: Country):

DDDO BHF SE			
Sermany			

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 un Legal Name	ODDO BHF SE
2	Append a list of foreign branches which are covered by this questionnaire	ODDO BHF SE and its branches in Frankfurt, Baden-Baden, Berlin, Bremen, Düsseldorf, Essen, Hamburg, Hannover, Köln, Mainz, München, Münster, Nürnberg, Rottweil, Siegen, Stuttgart
3	Full Legal (Registered) Address	Gallusenlage 8
4	Full Primary Business Address (if different from above)	## S()329 Frankfurt/Main (Germany)
5	Date of Entity incorporation/establishment	01.01.1970
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No 🔽
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No 🔽
6 c	Government or State Owned by 25% or more	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	Philippe Oddo, 28%
7	% of the Entity's total shares composed of bearer shares	0 %
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No 🔻
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht) Graurheindorfer Straße 1 08 53117 Bonn
11	Provide Legal Entity Identifier (LEI) if available	5299OOXLAZ15LYK8XK27
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	
		ODDO BHF SE

Ultimate parent  44 Salect the business areas applicable to the Entity  15 Provise Banking  16 Commercial Banking  17 Ves  18 Commercial Banking  18 Ves  19 Commercial Banking  19 Ves  10 Commercial Banking  18 Provise Banking  18 Provise Banking  18 Provise Banking  19 Ves  10 Commercial Banking  18 Ves  19 Salect Banking  19 Ves  10 Commercial Banking  10 Ves  10 Commercial Banking  10 Ves  10 Salect Banking			
Select the business areas applicable to the Entity   14 a   Retail Banking   Yes	13	Jurisdiction of licensing authority and regulator of	Autorité des Marchés Financiers (AMF). France
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Retail Banking			
Retail Banking			
14 c   Private Banking   Yes			
14 c   Commercial Banking   Yes		-	
Transactional Banking			Yes
14 e Investment Banking Yes   Carlot of Securities Services Custody Yes   Carlot of Securities Secu	14 c		Yes
14 f	14 d	Transactional Banking	Yes
Yes	14 e	Investment Banking	
14 g	14 f	Financial Markets Trading	Yes
14 h   Broker/Dealer   Yes	14 a	Securities Services/Custody	
Multilateral Development Bank   No		·	
14 k Other (please explain)  15 Oces 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 in 10% of its revenue from non-resident customers primarily resident in a different jurisdiction to the location where bank services are provided)  15 a Fry Drovide that both free customers where the non-resident customers are located.  16 Select the closest value:  16 a Number of employees  17 a Number of employees  17 a Confirm Assistant of the customers are located in the above Section are expressed via of all the LEP stranches.  17 a If N. clarify which questions the difference's relate to and the branches that this applies to.  18 if appropriate, provide any additional information/bortext to the answers in this section.  18 if spropriate, provide any additional information/bortext to the answers in this section.  19 a Correspondent Banking  2. PRODUCTS & SERVICES  19 a Correspondent Banking  19 a Correspondent Banking  19 a Correspondent Banking  19 a Correspondent Banking  19 a Does the Entity allow domestic bank?  19 a Does the Entity allow domestic bank clients to domestic banks?  19 a Correspondent Banking  20 boes the Entity allow domestic bank clients to domestic banks?  19 a Correspondent Banking  20 boes the Entity allow domestic bank clients to the correspondent Banking  20 boes the Entity allow domestic bank clients to the correspondent Banking  21 boes the Entity allow domestic bank clients with foreign banks?  19 a Correspondent Banking  20 boes the Entity allow domestic bank clients with foreign banks?  19 a Correspondent Banking  20 boes the Entity allow domestic bank clients with foreign banks?  20 boes the Entity allow domestic bank clients with foreign b			
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19 Does the Entity offer the following products and services:  19 a1 Correspondent Banking  19 a1 If Y  19 a1a Does the Entity offer Correspondent Banking services to domestic banks?  19 a1b Does the Entity allow domestic bank clients to provide downstream relationships?  19 a1c Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  19 a1d Does the Entity offer Correspondent Banking services to foreign banks?  19 a1e Does the Entity allow downstream relationships with foreign banks?  19 a1e Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  19 a1f Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?		information/context to the answers in this section.	I Wa
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19 a1d Does the Entity offer Correspondent Banking services to foreign banks?  19 a1e Does the Entity allow downstream relationships with foreign banks?  19 a1f Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?			res
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19 alf Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  19 alh Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	19 a1e		Vac U
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19 a1g Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?			·
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19 a1h Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	19 a1g	L. complete to regulated Manage Danilla - Decita	I No
with MSBs, MVTSs, or Payment Service Provider (PSPs)?	19 a1g		l I
(PSPs)?	_	(MSBs)/Money Value Transfer Services (MVTSs)?	
	_	(MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships	
40 -414 MCDo	_	(MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
19 am   Mods INO	_	(MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	
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	19 a1h 19 a1h1	(MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?  MSBs	No
I WU I I U U	19 a1h 19 a1h1 19 a1h2	(MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	

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19 a1i	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	Yes
19 f	International Cash Letter	No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	No -
19 i	Payment services to non-bank entities who may	NO Lamb
191	then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 14	eCommerce Platforms	No
19 15	Other - Please explain	
19 j	Private Banking	Both
19 k	Remote Deposit Capture (RDC)	No -
19 I	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No -
19 n	Trade Finance	Yes
19 o	Virtual Assets	No -
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:	
19 p1	Check cashing service	No
19 p1a	If yes, state the applicable level of due diligence	Please select
19 p2	Wire transfers	No.
19 p2a	If yes, state the applicable level of due diligence	Please select
19 p3	Foreign currency conversion	No.
19 p3a	If yes, state the applicable level of due diligence	Please select
19 p4	Sale of Monetary Instruments	No.
19 p4a	If yes, state the applicable level of due diligence	Please select
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
19 q	Other high-risk products and services identified by the Entity (please specify)	n/a
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	n/a
	information/context to the answers in this section.	n/a
3. AML, C	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME	n/a
3. AML, C	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
3. AML, C 22 22 a	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise	Yes
3. AML, C 22 22 a 22 b	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
3. AML, C 22 22 a 22 b 22 c	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise	Yes
3. AML, C 22 22 a 22 b 22 c	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 d	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership	Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 e	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting	Yes Yes Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD	Yes Yes Yes Yes Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	Yes Yes Yes Yes Yes Yes Yes Yes Yes
3. AML, C 22 22 a 22 b 22 c 22 c 22 d 22 e 22 f 22 g 22 h	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 h 22 i	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 c 22 d 22 f 22 g 22 h 22 i 22 j	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures  PEP Screening	Yes
3. AML, C 22 22 a 22 b 22 c 22 d 22 d 22 e 22 f 22 g 22 h 22 i	information/context to the answers in this section.  TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes

22 m	Suspicious Activity Reporting	Yes	
22 n	Training and Education	Yes	≡
22 o	Transaction Monitoring	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.	n/a	
4. ANT	I BRIBERY & CORRUPTION		7
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and	Yes	Ų
31	report bribery and corruption?  Does the Entity have an enterprise wide programme	Yes	
32	that sets minimum ABC standards? Has the Entity appointed a designated officer or	162	
	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:	Not Applicable	
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.	Yes	•
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes	V
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)?	Yes	V
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes	V
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	•
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes	
40 a	Potential liability created by intermediaries and		-

40 Ь	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	•
40 с	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	•
40 d	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 Entity'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	No	
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	Not Applicable	
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 Section are representative of all the LE's branches	Yes	*
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.	n/a	
5 AMI 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	Yes	
46 b	Terrorist financing	Yes	
46 c	Sanctions violations	Yes	言
47	Are the Entity's policies and procedures updated at least annually?	Yes	-
48	Has the Entity chosen to compare its policies and procedures against:	Disability (1995)	418
48 a	U.S. Standards	No	
48 a1	If Y, does the Entity retain a record of the results?	Not Applicable	
48 b	EU Standards	Yes	
48 b1	If Y, does the Entity retain a record of the results?	Yes	
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	-
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	₹
49 d	Prohibit accounts/relationships with shell banks	Yes	言
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	F
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	No	V
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents,	V	
	exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes	

49 i			
	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	
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	Yes	
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	s 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	V
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes	v
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	豆
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	n/a	
	information/context to the answers in this section.		
		liva .	_
	information/context to the answers in this section.  TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:		
6. AML, C	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the	Yes	
6. AML, C 54 54 a 54 b	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes Yes	
6. AML, C 54 54 a 54 b 54 c	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product Channel	Yes Yes Yes	
6. AML, C 54 54 a 54 b	TF & SANCTIONS RISK ASSESSMENT  Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  Client  Product	Yes Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a	TF & SANCTIONS RISK ASSESSMENT  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	Yes Yes Yes Yes Yes Yes	
6. AML, C' 54 54 a 54 b 54 c 54 d 55 55 55 a	TF & SANCTIONS RISK ASSESSMENT  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	Yes Yes Yes Yes Yes Yes Yes	
6. AML, C' 54  54 a  54 b  54 c  54 d  55 a  55 b  55 c	TF & SANCTIONS RISK ASSESSMENT  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	Yes Yes Yes Yes Yes Yes Yes Yes Yes	
6. AML, C' 54 54 a 54 b 54 c 54 d 55 55 55 a	TF & SANCTIONS RISK ASSESSMENT  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	Yes Yes Yes Yes Yes Yes Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 e	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 g	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 g	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C' 54  54 a  54 b  54 c  55 c  55 a  55 c  55 d  55 c  55 f  55 g  55 h	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C' 54  54 a  54 b  54 c  55 d  55 c  55 d  55 c  55 f  55 g  55 h  56 a	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	TF & SANCTIONS RISK ASSESSMENT  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.	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	TF & SANCTIONS RISK ASSESSMENT  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.	Yes	
6. AML, C 54 54 a 54 b 54 c 54 d 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54  54 a 54 b 55 c 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C 54  54 a 54 b 55 c 55 d 55 c 55 d 55 c 55 f 55 f 55 c 55 f 55 7 55 7 57 a 57 c 57 d 58	TF & SANCTIONS RISK ASSESSMENT  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:	Yes	
6. AML, C' 54  54 a  54 b  55 c  55 d  55 c  55 d  55 c  55 f  55 f  55 a  57 57 a  57 b  57 c  57 d  58 8	TF & SANCTIONS RISK ASSESSMENT  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	Yes	
6. AML, C' 54  54 a  54 b  54 c  55 c  55 a  55 b  55 c  55 d  55 c  55 f  55 g  55 h	TF & SANCTIONS RISK ASSESSMENT  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:	Yes	

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58 e 58 f	Name Screening Transaction Screening	Yes Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	n/a
	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
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?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e 64 f	Product usage	Yes Yes
64 g	Purpose and nature of relationship  Source of funds	
64 h	Source of wealth	Yes Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3 67 a4	Business Type/Industry Legal Entity type	Yes Yes
67 a5	Adverse Information	Yes Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2 68 a3	KYC renewal	No No
68 a4	Trigger event Other	No No
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a 69 a1	If Y, is this at:	Was
69 a1	Onboarding KYC renewal	Yes Yes
və d£	KIOIDIIDWAI	105

Trigger event	Yes
What is the method used by the Entity to screen for	Combination of automated and manual
Adverse Media/Negative News?  Does the Entity have a risk based approach to screening	Combination of automated and manual
	Yes
If Y, is this at:	المراجعية المساعر والرواد والرواد والإسارة والمراجعة المتعارفي والمراجعة
Onboarding	Yes
KYC renewal	Yes
Trigger event	Yes
What is the method used by the Entity to screen PEPs?	Combination of automated and manual
Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
If yes, select all that apply:	
Less than one year	No
1 – 2 years	Yes
3 – 4 years	No
5 years or more	Yes
Trigger-based or perpetual monitoring reviews	Yes
Other (Please specify)	
Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?	Yes
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?	
Arms, defence, military	EDD on risk-based approach
Respondent Banks	EDD on risk-based approach
If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
Embassies/Consulates	EDD on risk-based approach
Extractive industries	EDD on risk-based approach
Gambling customers	Restricted
	EDD on risk-based approach
	Prohibited
	Prohibited
	EDD on risk-based approach
	EDD on risk-based approach
Non-resident customers	Restricted
Nuclear power	Restricted
Payment Service Providers	Restricted
PEPs	EDD on risk-based approach
PEP Close Associates	EDD on risk-based approach
PEP Related	EDD on risk-based approach
Precious metals and stones	EDD on risk-based approach
Red light businesses/Adult entertainment	Prohibited
Red light businesses/Adult entertainment Regulated charities	Prohibited Restricted
Red light businesses/Adult entertainment Regulated charities Shell banks	Prohibited  Restricted  Prohibited
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited  Restricted  Prohibited  EDD on risk-based approach
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Prohibited  Restricted  Prohibited  EDD on risk-based approach  Restricted
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies	Prohibited  Restricted  Prohibited  EDD on risk-based approach
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities	Prohibited  Restricted  Prohibited  EDD on risk-based approach  Restricted
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers	Prohibited  Restricted  Prohibited  EDD on risk-based approach  Restricted  Restricted
Red light businesses/Adult entertainment Regulated charities Shell banks Travel and Tour Companies Unregulated charities Used Car Dealers Virtual Asset Service Providers	Prohibited  Restricted  Prohibited  EDD on risk-based approach  Restricted  Restricted  Restricted  among others: Companies which conduct their business mainly on a cash basis (i.e. restaurants, car dealers, art and antiques dealers), gold/ gemstone dealers, professional athletes (only natural person), scrap dealer/ waste
	Adverse Media/Negative News?  Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?  If Y, is this at:  Onboarding  KYC renewal  Trigger event  What is the method used by the Entity to screen PEPs?  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?  Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?  If yes, select all that apply:  Less than one year  1 - 2 years  3 - 4 years  5 years or more  Trigger-based or perpetual monitoring reviews  Other (Please specify)  Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?  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?  Arms, defence, military  Respondent Banks  If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Embassies/Consulates  Extractive industries  Gambling customers  General Trading Companies  Marijuana-related Entities  MSB/MVTS customers  Non-account customers  Non-account customers  Non-covernment Organisations  Non-resident customers  Non-covernment Organisations  Non-resident customers  Nuclear power  Payment Service Providers  PEPs  PEP Close Associates  PEP Related

78 a	If Y indicate who provides the approval:	Both
79	Does the Entity have specific procedures for 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
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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.	n/a
8. MONIT	FORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
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?	Vendor-sourced tools
84 b1	if 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	SMARAGD
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
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.	n/a
9. PAYME	ENT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group	V
	Payment Transparency Standards?	Yes

93	Does the Entity have policies, procedures and	
33	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b		
	Local Regulations	
93 b1	If Y, specify the regulation	EU Funds Transfer Regulation 2015/847
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	n/a
10. SANO	CTIONS	
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?	Yes
99	Does the Entity have policies, procedures, or other 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)?	Yes
100	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	SMARAGD
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	1-2 years
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	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	
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:		10
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data	
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data	
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data	
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data	
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data	
106 f	Other (specify)	Internal Deny lists, Worldcheck/ Factiva	
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 a	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.	n/a	
11. TRAINI	NG & EDUCATION		
111	Does the Entity provide mandatory training, which includes:		
111 a	Identification and reporting of transactions to government authorities	Yes	<b>T</b>
111 Б	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 c 111 d		Yes Yes	<ul><li>■</li><li>▼</li></ul>
111 d 111 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture		<b>□ •</b>
111 d 111 e 111 f	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud	Yes	<b>■ ▼</b>
111 d 111 e 111 f 112	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:	Yes No Yes	V
111 d 111 e 111 f 112	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management	Yes No Yes Yes	
111 d 111 e 111 f 112 112 a 112 b	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence	Yes No Yes Yes Yes	
111 d  111 e  111 f  112  112 a  112 b  112 c	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence	Yes No Yes Yes Yes Yes Yes	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have	Yes No Yes Yes Yes	
111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 e	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes No Yes Yes Yes Yes Yes Yes No	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 c	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and	Yes No Yes Yes Yes Yes Yes Yes Yes	
111 d 111 e 111 f 112 112 a 112 b	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture Fraud Is the above mandatory training provided to: Board and Senior Committee Management 1st Line of Defence 2nd Line of Defence 3rd Line of Defence Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	Yes No Yes Yes Yes Yes Yes Yes Yes Yes	
111 d 111 e 111 f 112 112 a 112 b 112 c 112 d 112 e 112 f	terrorist financing and sanctions violations  New issues that occur in the market, e.g. significant regulatory actions or new regulations  Conduct and Culture  Fraud  Is the above mandatory training provided to:  Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  Does the Entity provide customised training for AML,	Yes No Yes Yes Yes Yes Yes Yes Yes Yes Yes No Yes	

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
116	W	
116	If appropriate, provide any additional information/context to the answers in this section.	n/a
12. QUAL	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based	
	Quality Assurance programme for financial crime (separate from the independent Audit function)?	No T
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	No 🔻
119	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
119 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context to the answers in this section.	n/a
13. AUDIT	As well a process of the second	
121	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes
122	How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
122 b	External Third Party	Yearly
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	Yes ▼
123 b 123 c	Enterprise Wide Risk Assessment Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 J	Transaction Screening including for sanctions	Yes
123 k	Training & Education	Yes
123	Other (specify)	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
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.	n/a
4. FRAU	ID TO THE THE TAX TO T	
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	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.	n/a
Decidial	tion Statement	
Wolfsberg G	Group Correspondent Banking Due Diligence Questionnaire 2023 (Ct Statement (To be signed by Global Head of Correspondent Banl y Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
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