

Financial Institution Name: Location (Country):

PERSIA INTERNATIONAL BANK UNITED KINGDOM

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
1. ENTITY	& OWNERSHIP	Citation
1	Full Legal Name	
		PERSIA INTERNATIONAL BANK PLC
2	Append a list of foreign branches which are covered by this questionnaire	MILAN BRANCH - ITALY
3	Full Legal (Registered) Address	6 LOTHBURY LONDON EC2R 7HH
4	Full Primary Business Address (if different from above)	SAME AS ABOVE
5	Date of Entity incorporation/eslablishment	16 MAY 2001
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	N/A
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	Bank Mellat - 60% Bank Tejarat - 40%
7	% of the Entity's total shares composed of bearer shares	N/A
В	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	N/A
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	FINANCIAL CONDUCT AUTHORITY (FCA) AND PRUDENTIAL REGULATION AUTHORITY (PRA)
11	Provide Legal Entity Identifier (LEI) if available	213800HTIY6D1KMBG757
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	Bank Mellat -60% Bank Tejarat- 40%

13	Jurisdiction of licensing authority and regulator of	Iran
	ultimate parent	Central Bank of Iran
		- Control Dam of Nation
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	Yes
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	No No
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No No
14 k	Other (please explain)	IND
174	Outer (prease explain)	Trade Finance , Commercial and Syndication Loans and Correspondent Banking
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 resident in a different jurisdiction to the location where bank services are provided)	Yes
15 a	If Y, provide the top five countries where the non- resident customers are located.	-Middle East -Africa -Europe -Swiss
16	Select the closest value:	
16 a	Number of employees	1-50
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above	Street 9100 and 9000 tringer
	Section are representative of all the LE's branches.	Yes
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 0000	HATE & CEDWICEC	
19	Does the Entity offer the following products and	
19	services:	
19 a	Correspondent Banking	W.
19 a1	ffY	Yes
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	No
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	No
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	No
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
19 a1h1	MSBs	No
19 a1h2	MVTSs	No
19 a1h3	PSPs	Yes

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	
19 c	Cross-Border Remittances	No
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No No
19 f	International Cash Letter	No
19 g	Low Price Securities	
19 h	Payable Through Accounts	No
19 i		No
131	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y, please select all that apply below?	The part of the last of the la
19 i2	Third Party Payment Service Providers	No
19 i3	Virtual Asset Service Providers (VASPs)	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
191	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 р	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	Yes
19 p2a	If yes, state the applicable level of due diligence	Due diligence
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.	N/A
19 q	Other high-risk products and services identified by the Entity (please specify)	
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.	N/A
21	If appropriate, provide any additional information/context to the answers in this section.	ži.
	CTF & SANCTIONS PROGRAMME	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 a	Appointed Officer with sufficient experience/expertise	Yes
22 b	Adverse Information Screening	Yes
22 c	Beneficial Ownership	Yes
22 d	Cash Reporting	Yes
22 e	CDD	Yes
22 f	EDD	Yes
22 g	Independent Testing	Yes
22 h	Periodic Review	Yes
22 i	Policies and Procedures	Yes
22 j	PEP Screening	Yes
22 k	Risk Assessment	
22	Sanctions	Yes
	Currogoria	Yes

22 m	Suspicious Activity Reporting	V
22 m	Training and Education	Yes 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.	<b>3</b> 5
A ANTI	BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and	Yes
	requirements to reasonably prevent, detect and report bribery and corruption?	165
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	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
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
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
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and	

	·	
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 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	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	No
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No
42 f	Non-employed workers as appropriate (contractors/consultants)	No
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.	=:
5. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	والمستناف والبالي والمتحرب والمتحرب والمتحرب والمتحرب والمتحرب والمتحرب والمتحرب
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
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:	
48 a		
	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	No Not Applicable
48 b	If Y, does the Entity retain a record of the results? EU Standards	
48 b 48 b1	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Not Applicable
48 b 48 b1 49	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results? Does the Entity have policies and procedures that	Not Applicable Yes
48 b 48 b1	If Y, does the Entity retain a record of the results? EU Standards If Y, does the Entity retain a record of the results?	Not Applicable Yes
48 b 48 b1 49	If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that  Prohibit the opening and keeping of anonymous	Not Applicable Yes Yes
48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for	Not Applicable Yes Yes Yes
48 b 48 b1 49 49 a	If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide	Not Applicable Yes Yes Yes Yes
48 b 48 b1 49 49 a 49 b	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	Not Applicable Yes Yes Yes Yes Yes
48 b 48 bt 49 49 a 49 b 49 c 49 d	If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit accounts/relationships with shell banks  Prohibit dealing with another entity that provides	Not Applicable Yes Yes Yes Yes Yes Yes
48 b 48 bt 49 49 a 49 b 49 c 49 d 49 c	If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain a record of the results?  Does the Entity have policies and procedures that:  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking services to unlicensed banks  Prohibit accounts/relationships with shell banks  Prohibit dealing with another entity that provides services to shell banks  Prohibit opening and keeping of accounts for	Not Applicable Yes Yes Yes Yes Yes Yes Yes Yes

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similar document which defines a risk boundary a round their business?  51	similar document which defines a risk boundary a round their busines?  51		for the maintenance of	Yes
comply with applicable lawer?  If Y, what is the retention period?  Syears or more  Syears or more  Syears or more  Syears or more  Yes  Confirm that all responses provided in the above section are representative of all the LE's branches  Sa a	comply with applicable laws?  If Y, what is the retention period?  Syears or more  2	similar document which		Yes
Syears or more	Syears or more			Yes
Section are representative of all the LE's branches  If N, clarify which questions the difference's relate to and the branches that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  AML CTF & SANCTIONS RISK ASSESSMENT  54 Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:  54 a Client  75 Poduct  Channel  55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  55 Over the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  55 Customer Due Diligence  76 Coustomer Due Diligence  76 Per Hentification  77 Section Section  78 Section Section  78 Section Section  79 Section Section Section  79 Section Section Section  79 Section Section Section  79 Section Sect	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.  AMIL CTF & SANCTIONS RISK ASSESSMENT  Lobes the Entity's AMIL & CTF EWRA cover the inherent risk components detailed below:  Lieuth Collect  Channel Yes  Geography Ves  Collect  Channel Yes  Coustomer Oue Diligence  Fig. PEP klentification  Vas  Transaction Screening  Amae Screening against Adverse Media/Negative News  Management Information  Answer  Fig. June 18 Management Information  Fig. Ju	51 a If Y, what is the retention	n period?	5 years or more
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54 d Geography Yes  55 Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  55 a Transaction Monitoring Yes  55 b Customer Due Diligence Yes  55 c PEP Identification Yes  55 d Transaction Screening Yes  55 d Transaction Screening Yes  55 e Name Screening against Adverse Media/Negative News  55 f Training and Education Yes  55 g Governance Yes  55 h Management Information Yes  56 has the Entity's AML & CTF EWRA been completed in the last 12 months?  56 a If N, provide the date when the last AML & CTF  EWRA was completed.  57 a Client Yes  57 c Channel Yes  58 a Customer Due Diligence Yes  58 a Customer Due Diligence Yes  58 a Customer Due Diligence Yes	54 d Geography Yes  Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:  55 a Transaction Monitoring Yes  55 b Customer Due Diligence Yes  55 c PEP Identification Yes  55 d Transaction Screening Yes  56 d Has the Entity's AML & CTF EWRA been completed in the last 12 months?  56 d Has the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 d Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 d Geography Yes  58 d Customer Due Diligence Yes  58 d Covernance Yes  58 d Covernance Yes  58 d Governance Yes  58 d Governance Yes	information/context to the  AML_CTF & SANCTIONS RISK AS:  Does the Entity's AML, & inherent risk components  Client	answers in this section.  SESSMENT  CTF EWRA cover the	Yes
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55 b Customer Due Diligence Yes 55 c PEP Identification Yes 55 d Transaction Screening Yes 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed. 57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 b Product Yes 57 c Channel Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes	S5 b Customer Due Diligence Yes S5 c PEP Identification Yes S5 d Transaction Screening Yes S5 e Name Screening against Adverse Media/Negative News Yes S5 f Training and Education Yes S5 g Governance Yes S5 h Management Information Yes S6 h Has the Entity's AML & CTF EWRA been completed in the last 12 months? S6 h Has the Entity's AML & CTF EWRA been completed in the last 12 months? S6 a If N, provide the date when the last AML & CTF EWRA was completed. S7 a Client Yes S7 b Product Yes S7 c Channel Yes S7 d Geography Yes S8 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: S8 a Customer Due Diligence Yes S8 b Governance Yes	information/context to the  6. AML_CTF & SANCTIONS RISK AS:  54 Does the Entity's AML, & inherent risk components  54 a Client  54 b Product  54 c Channel	answers in this section.  SESSMENT  CTF EWRA cover the	Yes Yes Yes
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Transaction Screening  Transaction Screening against Adverse Media/Negative News  Training and Education  Yes  Governance  Yes  Training and Education  Yes  To Governance  Yes  Training and Education  Yes	Transaction Screening Tyes  Transaction Screening against Adverse Media/Negative News  Training and Education Yes  Governance Yes  Training and Education Yes  Training an	information/context to the  54 Does the Entity's AML & inherent risk components  54 a Client  54 b Product  54 c Channel  54 d Geography  55 Does the Entity's AML & controls effectiveness co	SESSMENT CTF EWRA cover the s detailed below: CTF EWRA cover the mponents detailed below:	Yes Yes Yes Yes Yes
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55 g Governance Yes 55 h Management information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence  Yes	55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes 58 b Governance Yes	information/context to the  information/context to the  information/context to the  base of the context of the  control o	SESSMENT CTF EWRA cover the s detailed below: CTF EWRA cover the mponents detailed below:	Yes
S5 g   Governance   Yes	S5 g   Governance   Yes	information/context to the  5. AML CTF & SANCTIONS RISK AS: 54 Does the Entity's AML & inherent risk components 54 a Client 54 b Product 54 c Channel 55 d Geography 55 Does the Entity's AML & controls effectiveness co 55 a Transaction Monitoring 55 b Customer Due Diligenc 55 c PEP Identification 55 d Transaction Screening 55 e Name Screening again	ESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:	Yes
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57 b     Product     Yes       57 c     Channel     Yes       57 d     Geography     Yes       58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:     Ves       58 a     Customer Due Diligence     Yes	57 b     Product     Yes       57 c     Channel     Yes       57 d     Geography     Yes       58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:     Ves       58 a     Customer Due Diligence     Yes       58 b     Governance     Yes	information/context to the  information/context to the  information/context to the  second of the context of the  information/context to the  second of the context of the  second of the	answers in this section.  SESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  Description TF EWRA been completed then the last AML & CTF	Yes
57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes	57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 58 b Governance Yes	information/context to the information/context to the information/context to the information of the informat	answers in this section.  SESSMENT  CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  DEST OF THE SET OF THE S	Yes
57 d Geography Yes  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes	57 d Geography Yes  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes  58 b Governance Yes	information/context to the  information/context Asis  information/s Asis  Client  Information/s Asis  Client  Information/context to the  information/s Asis	answers in this section.  SESSMENT  CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  DEST OF THE SET OF THE S	Yes
58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 Customer Due Diligence Yes	58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes  58 b Governance Yes	information/context to the  information/context to the  information/context to the  information/context to the  controls the Entity's AML & Client  information in the Controls of the Controls of the Entity's AML & Controls of the Entity's Ent	answers in this section.  SESSMENT  CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  DEST OF THE SET OF THE S	Yes
effectiveness components detailed below:  58 a Customer Due Diligence Yes	effectiveness components detailed below:  58 a Customer Due Diligence Yes  58 b Governance Yes	information/context to the information/context to the information/context to the information of the informat	answers in this section.  SESSMENT  CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  DEST OF THE SET OF THE S	Yes
100	58 b Governance Yes	information/context to the information informati	answers in this section.  SESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  Detailed below:  TF EWRA cover the mponents detailed below:	Yes
58 b Governance Voc		information/context to the information of the information	answers in this section.  SESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  Sest Adverse Media/Negative  TF EWRA been completed then the last AML & CTF  Ins EWRA cover the inherent l below:  Ins EWRA cover the controls is detailed below:	Yes
58 c List Management Yes	56 C   List Management   Yes	information/context to the  information/context Asia  info	answers in this section.  SESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  Sest Adverse Media/Negative  TF EWRA been completed then the last AML & CTF  Ins EWRA cover the inherent l below:  Ins EWRA cover the controls is detailed below:	Yes
100	58 d Management Information Yes	information/context to the information/context Asia informa	answers in this section.  SESSMENT CTF EWRA cover the s detailed below:  CTF EWRA cover the mponents detailed below:  Sest Adverse Media/Negative  TF EWRA been completed then the last AML & CTF  Ins EWRA cover the inherent l below:  Ins EWRA cover the controls is detailed below:	Yes

58 e	Name Screening	Tw
	Name Screening	Yes
58 f	Transaction Screening	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	
61	and the branch/es that this applies to.  If appropriate, provide any additional	
	information/context to the answers in this section.	
7. KYC,	CDD and EDD	وربر أجالا ويوفر في تعبير المراجعة والمجاز والمنافرة والمنافرة والمنافرة والمنافرة والمنافرة والمنافرة والمنافرة
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	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	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 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes 10%
67	applied to beneficial ownership identification?  Does the due diligence process result in customers	Yes
67 a	receiving a risk classification?  If Y, what factors/criteria are used to determine the	TES
	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Please select
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	-
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	No
68 a4a	If yes, please specify "Other"	70.
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at	
69 a1 69 a2	Onboarding	Yes
	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for 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?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Please select
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	Please select
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
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	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Do not have this category of customer or industry
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Do not have this category of customer or industry
76 h	MSB/MVTS customers	Please select
761		
	Non-account customers	Restricted
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	EDD on risk-based approach
76	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w	Used Car Dealers	
		EDD on risk-based approach
76 x 76 y	Virtual Asset Service Providers Other (specify)	Prohibited
77	If restricted, provide details of the restriction	#J
78	Does EDD require senior business management and/ or compliance approval?	Yes

79 Does the E onboardin lawyers, a 80 Does the E quality rev 81 Confirm th Section are 81 a If N, clari and the I 82 If appropriinformation information informatio	- 15 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	F
onboardin lawyers, a 80 Does the E quality rev 1 Section are 81 a If N, clarifand the I Section are 82 If appropria information informatio	ndicate who provides the approval:	Both
quality rev 91 Confirm the Section are and the I section are and the I section are and the I section are section a	the Entity have specific procedures for irding entities that handle client money such as rs, accountants, consultants, real estate agents?	Yes
Section and Section and the Island If N, clarification and the Island If N, clarification information	the Entity perform an additional control or y review on clients subject to EDD?	Yes
and the I	m that all responses provided in the above in are representative of all the LE's branches	Yes
information  8. MONITORING 8.  83. Does the E and monitor reporting or the state of	clarify which questions the difference/s relate to the branch/es that this applies to	±1
B3 Does the E and monitor reporting of the stand monitor reporting of the stand monitor reporting of the standard monitor reporting of the standard standard standard system of the sta	opriate, provide any additional ation/context to the answers in this section.	
and monitor reporting of the transaction of t	& REPORTING	
transaction  84 a If manual type of transaction  84 b If automa system of the name of the	the Entity have risk based policies, procedures onitoring processes for the identification and ng of suspicious activity?	Yes
type of trailing to the second of the second	s the method used by the Entity to monitor ctions for suspicious activities?	Manual
84 b1 system of the name of th	nual or combination selected, specify what of transactions are monitored manually	All transactions initiated and carried out related to Customers or trade finance deals or loans
the name of the na	tomated or combination selected, are internal em or vendor-sourced tools used?	Vendor-sourced tools
84 b3 When wapplicat  85 Does the Ereport sust  85 a If Y, does processes reporting  86 Does the Eprocesses the monito  87 Does the Eprogramm transaction  88 Does the Enter the	/endor-sourced tool' or 'Both' selected, what is name of the vendor/tool?	KYC C6
applicat  85 Does the E report sus;  85 a If Y, does processes reporting  86 Does the E processes the monito  87 Does the E programm transaction  88 Does the E to Request in a timety may be a timety may be confirm the Section are got a fif N, clarified and the E	en was the tool last updated?	<1 year
report susy  85 a If Y, does processes reporting  86 Does the E processes the monito  87 Does the E programm transaction  88 Does the E to Request in a timely man processes in a timely man process i	en was the automated Transaction Monitoring dication last calibrated?	< 1 year
processes reporting  86 Does the E processes the monito  87 Does the E programm transaction  88 Does the E to Request in a timety  89 Does the E Requests in a timety may a ti	the Entity have regulatory requirements to suspicious transactions?	Yes
processes the monito  87 Does the E programm transaction  88 Does the E to Request in a timety  89 Does the E Requests in a timety may not confirm the Section are grown and the box of the E section are grown and the box of the E section are grown and the box of the E section are grown and the box of the E section are grown and the box of the E section are grown and the box of the E section are grown and the box of the E section are grown and the E section are grown as the E s	does the Entity have policies, procedures and esses to comply with suspicious transaction rting requirements?	Yes
programm transaction  B8 Does the E to Request in a timety  B9 Does the E Requests in a timety may  90 Confirm the Section are  90 a If N, clarificand the box in a proprietation of the E to Section are and the box in a proprietation of the section are and the box in a proprietation of the section are and the box in a proprietation of the section are a proprietation of the section of the section of the section are a proprietation of the section of the s	the Entity have policies, procedures and sees to review and escalate matters arising from politoring of customer transactions and activity?	Yes
to Request in a timety  B9 Does the E Requests in a timety may be a timety may be confirm the Section are fif N, clarificand the E	he Entity have a data quality management Imme to ensure that complete data for all ctions are subject to monitoring?	No
Requests f a timely ma  Confirm the Section are  ff N, clarif and the b	the Entity have processes in place to respond uest For Information (RFIs) from other entities nety manner?	No
Section are 90 a If N, clarif and the b	the Entity have processes in place to send sts for Information (RFIs) to their customers in y manner?	Yes
and the b	m that all responses provided in the above n are representative of all the LE's branches	Yes
1	clarify which questions the difference/s relate to the branch/es that this applies to	<del></del>
Information	opriate, provide any additional ation/context to the answers in this section.	ъ
O DAVISE DE LO	A LIND A MELION	
9. PAYMENT TRANS		
D000 010 Q	he Entity adhere to the Wolfsberg Group ent Transparency Standards?	Yes

93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place	
	to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	UK money laundering and Terrorist Financing Regulations 2019 & Criminal Finance Act (2017)
		UN money rauntiening and Tentorist Financiary (Reginations 2019 a Cilininal Finance AC (2017)
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,	
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?	Manual
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 tooi' or 'both' selected, what is the name of the vendor/tool?	KYC C6
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)	Other
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions	Yes
104	against Sanctions Lists?  What is the method used by the Entity?	

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:	
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	Not used
106 f	Other (specify)	*
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?	Yes
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.	
11 TRAIN	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 Ь	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	Yas
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
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d 112 e	3rd Line of Defence Third parties to which specific FCC activities have	No
	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
114 a	If Y, how frequently is training delivered?	Other
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	Yes

115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	-
116	If appropriate, provide any additional information/context to the answers in this section.	•
	Y 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)?	Yes
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?	Yes
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.	<del></del> :
13. AUDIT		
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	Component-based reviews
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	Yes
123 d	Governance 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 123 k	Transaction Screening including for sanctions Training & Education	Yes Yes
123	Other (specify)	Yes
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.	
14. FRAU	Dent Control of the C	
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

## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V<sub>1,4</sub>

129	Does the Entity have real time monitoring to detect fraud?	No
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?	No
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.	

132	If appropriate, provide any additional information/context to the answers in this section.	
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<u>Declarat</u>	tion Statement	
Declaration	Group Correspondent Banking Due Diligence Questionnaire 2023 (CE I Statement (To be signed by Global Head of Correspondent Bank y Laundering, Chief Compliance Officer, Global Head of Financial	king or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of
every effor		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.
	ial Institution understands the critical importance of having effective egulatory obligations	ve and sustainable controls to combat financial crime in order to protect its reputation and to meet its
The Financ standards.	ial Institution recognises the importance of transparency regarding	ig parties to transactions in international payments and has adopted/is committed to adopting these
	ial Institution further certifies it complies with / is working to compl ation 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.
	ial Institution commits to file accurate supplemental information or	·
I, AZI the answer Institution.	Z AKHONDT - ASL (Global Head of s provided in this Wolfsberg CBDDQ are complete and correct to	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
ı. <u>ACIC</u> Wolfsberg	CBDDQ 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.
Sp	(Signature & Dat	12 (1212)
1	(Signature & Dat	19/06/2025