the Wolfsberg Grou

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	
1	Full Legal Name	
	an Esga 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/establishment	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 a 1	If Y, indicate the exchange traded on and ticker symbol	N/A
6 b	Member Owned/Mutual	N-
6 c	Government or State Owned by 25% or more	No .
6 d	Privately Owned	No
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
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
Ва	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
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
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14]	Wealth Management	No
14 k	Other (please explain)	7 15 0 11 10 11 11 12
		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.	Cuπently Iran only but it may change going forward
4.0		
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 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. PRODI	UCTS & SERVICES	
19	Does the Entity offer the following products and	
	services:	
19 a	Correspondent Banking	Yes
19 a1	IfY	
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	(PSPs)? MSBs	No
19 a1h1 19 a1h2 19 a1h3	(PSPs)?	No No

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	
19 d	Domestic Bulk Cash Delivery	Yes
19 e	Hold Mail	No
		No
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 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 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	No
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 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:	NO THE PROPERTY OF THE PROPERT
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	
19 p3	Foreign currency conversion	Due diligence
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 20 a		Yes N/A
	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to	
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section.	
20 a 21 3. AML, C	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. TF & SANCTIONS PROGRAMME Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	N/A
20 a 21 3. AML, C 22	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. 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	N/A Yes
20 a 21 3. AML, C 22 22 a 22 b	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & 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	N/A
20 a 21 3. AML, C 22 22 a 22 b 22 c	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. 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	N/A Yes
20 a 21 3. AML, C 22 22 a 22 b	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If & 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	N/A Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If a 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	N/A Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. AMAL, CTF and Sanctions standards regarding the following components: Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	N/A Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If & 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	N/A Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If & 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	N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 e 22 f 22 g 22 h	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information 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	N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information section in this section. If appropriate, provide any additional information section. If appropriate, provide any additional information section.	N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 g 22 h 22 i 22 j	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If a 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 Policles and Procedures PEP Screening	N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye
20 a 21 3. AML, C 22 22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Section are representative of all the LE's branches. If N, clarify which questions the difference/s relate to and the branch/es that this applies to. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information/context to the answers in this section. If appropriate, provide any additional information section in this section. If appropriate, provide any additional information section. If appropriate, provide any additional information section.	N/A Yes Yes Yes Yes Yes Yes Yes Yes Yes Ye

	To 32 And 5	
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	Ψ.
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-	2
29	If appropriate, provide any additional information/context to the answers in this section.	•
4 ANTI	PRIDERY & CORRUPTION	
4. ANTI	Has the Entity documented policies and procedures	
30	consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	Yes
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	
35 a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly inlended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 с	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
40 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.	(4)
45	If appropriate, provide any additional information/context to the answers in this section.	
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
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, Slandards	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 с	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h		

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	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	
		5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
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54	TF & SANCTIONS RISK ASSESSMENT Does the Entity's AML & CTF EWRA cover the	
E4.0	inherent risk components detailed below:	
54 a 54 b	inherent risk components detailed below: Client	Yes
54 a 54 b 54 c	inherent risk components detailed below: Client Product	Yes
54 b	inherent risk components detailed below: Client Product Channel	Yes Yes
54 b 54 c	inherent risk components detailed below: Client Product	Yes
54 b 54 c 54 d	inherent risk components detailed below: Client Product Channel Geography Does the Entity's AML & CTF EWRA cover the	Yes Yes
54 b 54 c 54 d 55 55 a 55 b	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
54 b 54 c 54 d 55 55 a 55 b 55 c	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
54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d	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	Yes Yes Yes Yes Yes Yes
54 b 54 c 54 d 55 55 a 55 b 55 c 55 d 55 c	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 f	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 e 55 f 55 g	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 f	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h	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	Yes
54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 f 55 g	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	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:	Yes
54 b 54 c 54 d 55 55 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	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	Yes
54 b 54 c 54 d 55 55 65 65 b 65 c 65 d 65 c 65 f 65 6 66 a 67 67 67 67 67	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	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 g 55 h 56 56 a 57	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	Yes
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 b 57 c 57 d	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
54 b 54 c 54 d 55 55 a 55 a 55 b 55 c 55 d 55 c 55 d 55 e 55 f 55 7 55 7 57 a 57 7 57 7 57 7 58	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

58 e	Nama Caraanina	1
1504	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 and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	=
7. KYC. C	DD and EDD	CONTRACTOR OF SERVICE STATE STATE STATE OF SERVICE STATE S
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 с	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold	Yes
67	applied to beneficial ownership identification? Does the due diligence process result in customers	10%
67 a	receiving a risk classification? If Y, what factors/criteria are used to determine the	Yes
	customer's risk classification? Select all that apply:	
67 a1 67 a2	Product Usage	Yes
67 a2 67 a3	Geography Rusiness Type/Industry	Please select
67 a4	Business Type/Industry Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Yes
	Color (opposity)	
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
	If yes, please specify "Other"	(章)
58 a4 a		
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
	screening customers for Adverse Media/Negative	Yes Yes

Advance the calcular growth of such by the childry someth for advanced and manual control of automated and manual control of such as the children of such and such as the children of such and such as the children of such as	69 a3	Trigger awart	Tw =
Acverse Media/Negative News? 71 Does the Entity hims a till beset approach to correcting customers and connected parties to determine whether they are EPPs, or contended by PEPs? 71 at 1 FV, is this at 1 FV,		Trigger event	Yes
Lustomers and connected parties to obtamine whether he year PEPs, or controlled by PEPs? 71 a		Adverse Media/Negative News?	
17 st Choparding	71	customers and connected parties to determine whether	
17 a2	71 a	If Y, is this at:	
Tigger event	71 a1	Onboarding	Yes
What is the remitted used by the Entity to server PEPP? Does the Entity three periods procedures are processed to review and escalable potential markets from servering outstomers and connected gardies to determine whether they are PEPs, or controlled by PEPs? Is KYC remewed at effect of froquencies based on risk arity (Periodic Reviews)? A I lys, select all that apply: 74 a I Lys select all that apply: 75 a 3 - 4 years Yes Cities (Pluses signation) Cities (Pluses signation) Cities (Pluses signation) Cities (Pluses signation) To be the Entity maintain and report matrics on current and past periodic or trigger event due diligence reviews or risk after are subject to EDD and/or are resoluted, or prohibitised by the Entity's PCD programme? 76 A Ams, defence, military EDD or risk-based approach To be Respondent Banking Principles 2022? 76 C Embassistic Consultans Do not have this category of customer or industrial and past periodic promptions of the EDD assessment Correspondent Banking Principles 2022? 76 C Embassistic Consultans Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Past Correspondent Banking Principles 2022? Principles Correspondent Companies Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have this category of customer or industry Do not have the category of customer or industry Principles Correspondent Correspo	71 a2	KYC renewal	Yes
Dees the Entity hase pelices, procedures and processes to provine and escalate potential matches from twenting processes. In the content of the processes of the Entity shall be prefer to the processes of the Entity shall be prefer to the processes of the Entity shall be prefer to the Entity shall be prefe	71 a3	Trigger event	Yes
us interest and connected parties to determine whether they are PEPs, or controlled by PEPs? 14 Is KYC netwes at offende forquencies based on risk rating (Periodic Reviewsy)? 14 I Less than one year Peps, select all that apply: 14 I Less than one year Peps, select all that apply: 15 I Less than one year Peps Peps Peps Peps Peps Peps Peps Peps		What is the method used by the Entity to screen PEPs?	Combination of automated and manual
rating (Periodic Reviews)? 74 at 1 Less than one year 74 at 2 1 - 2 years 74 at 2 1 - 2 years 74 at 3 3 - 4 years 74 at 3 3 - 4 years 75 Others (Pleness special) 76 Others (Pleness special) 77 Others (Pleness special) 78 Others (Pleness special) 79 Others (Pleness special) 70 Others (Pleness special) 71 Others (Pleness special) 72 Others (Pleness special) 73 Others (Pleness special) 74 Others (Pleness special) 75 Others (Pleness special) 76 Others (Pleness special) 77 Others (Pleness special) 78 Others (Pleness special) 79 Others (Pleness special) 79 Others (Pleness special) 70 Others (Pleness special) 70 Others (Pleness special) 71 Others (Pleness special) 72 Others (Pleness special) 73 Others (Pleness special) 74 Others (Pleness special) 75 Others (Pleness special) 76 Others (Pleness special) 77 Others (Pleness special) 78 Others (Pleness special) 78 Others (Pleness special) 79 Others (Pleness special) 79 Others (Pleness special) 70 Others (Pleness special) 70 Others (Pleness special) 71 Others (Pleness special) 72 Other (Special) 73 Others (Pleness special) 74 Other (Special) 75 Others (Pleness special) 76 Others (Pleness special) 77 Other (Special) 7	73	to review and escalate potential matches from screening customers and connected parties to determine whether	Yes
Please select Please Please select Please Please select Please	74		Yes
14 a2 1 - 2 years	74 a	If yes, select all that apply:	
74 a3	74 a1	Less than one year	Please select
Please select Please selec		1 – 2 years	Yes
Tigger-based or perpetual monitoring reviews Citims (Planon squesify) Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews? The Citims (Planon squesify) The Planon 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? The Arms, defence, milliary The Bull Respondent Banks EDD on risk-based approach The Bull Respondent Banks EDD on risk-based approach The Bull Respondent Banks EDD on risk-based approach The Bull Respondent Banks EDD on thave this category of customer or industry The Bull Respondent Banks EDD on thave this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Banks EDD on thave this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Banks Do not have this category of customer or industry The Bull Respondent Planon Banks EDD on thave this category of customer or industry The Bull Respondent Planon Banks The Bull Respondent Planon Banks The Bull Respondent Planon Banks EDD on thave this category of customer or industry The Bull Respondent Planon Banks EDD on insk-based approach EDD on insk-based approach The PEPS EDD on insk-based approach The Respondent Banks Prohibited The President Banks Prohibited The Presi		3 – 4 years	Yes
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78 Does EDD require senior business management and/			Prohibited —
	77	If restricted, provide details of the restriction	章:
	78		Yes

70.0	I Wy in finale who are idea for	
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.	=
8. MONIT	ORING & 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?	Manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	All transactions initiated and carried out related to Customers or trade finance deals or loans
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?	KYC C6
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?	No
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	No
89	Does the Enlity 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	다.
91	If appropriate, provide any additional information/context to the answers in this section.	
DAVNE	NT TRANSPARENCY	
9. FATME 92		
_	Does the Entity adhere to the Wolfsberg Group Payment 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)
93 с	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	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 representativo of all the LE's brenches	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. SAN	CTIONS	
98	Does the Entity have a Sanctions Policy approved by	
30	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 tool' 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)	Olher
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
04	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening? Select the Sanctions Lists used by the Entity in its	
106 a	sanctions screening processes:	
	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 Ь	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)	p.
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	Dooc 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 TDAIN	ING & EDUCATION	
111	Does the Entity provide mandatory training, which	
	includes:	
111 a	includes: Identification and reporting of transactions to government authorities	Yes
	Identification and reporting of transactions to	Yes
111 Ь	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant	
111 b	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering,	Yes
111 b 111 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant	Yes Yes Yes
111 b	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes Yes Yes Yes Yes
111 b 111 c 111 d 111 e 111 f	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, terrorist financing and sanctions violations New issues that occur in the market, e.g. significant regulatory actions or new regulations Conduct and Culture	Yes Yes Yes
111 a 111 b 111 c 111 d 111 e 111 f 112	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Yes Yes Yes
1111 b 1111 c 1111 d 1111 e 1111 f 112 a 112 b	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Yes Yes Yes Yes Yes
1111 b 1111 c 1111 d 1111 e 1111 f 1112 1112 a 1112 b 1112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Yes Yes Yes Yes Yes Yes
1111 b 1111 c 1111 d 1111 e 1111 f 112 a 112 a 112 b 112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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	Yes Yes Yes Yes Yes Yes Yes Yes Yes
1111 b 1111 c 1111 d 1111 e 1111 f 112 b 112 b 112 c 112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Third parties to which specific FCC activities have been outsourced	Yes
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 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 Yes Yes Yes Yes Yes Yes Yes Yes No Nol Applicable
1111 b 1111 c 1111 d 1111 e 1112 a 112 b 112 c 112 d 112 c	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Third parties to which specific FCC activities have been outsourced Non-employed workers (contractors/consultants) Does the Entity provide AML, CTF & Sanctions training	Yes Yes Yes Yes Yes Yes Yes Yes
1111 b 1111 c 1111 d 1111 e 1111 f 1112 a 1112 b	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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 Yes Yes Yes Yes Yes Yes Yes
111 b 111 c 111 d 111 e 111 f 112 a 112 b 112 c 112 d 112 c 112 f 113	Identification and reporting of transactions to government authorities Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered Internal policies for controlling money laundering, 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, CTF and Sanctions staff?	Yes Yes Yes Yes Yes Yes Yes Yes

Free		¬!
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	e e e e e e e e e e e e e e e e e e e
116	If appropriate, provide any additional information/context to the answers in this section.	
12. QUAL	ITY 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.	
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
123 123 a	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 D	Enterprise Wide Risk Assessment Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	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 í 123 j	Transaction Monitoring Transaction Screening including for sanctions	Yes 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?	Please select
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Please select
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. FRAL	JD.	
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?	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.	

## Declaration Statement Wolfsberg Group Correspondent Banking Due Difigence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer Anti-Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputative legal and regulatory obligations. The Financial Institution recognises the importance of Iransparency regarding parties to transactions in international payments and has adopted/is committed to standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Fine Information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. The Financial Institution commits to file accurate supplemental information on a timely basis. (Global Head of Correspondent Banking or equivalent), certify that I have read and understood the hastitution. ACCHARITA DARITA DA	
Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputative legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Financial Institution commits to file accurate supplemental information on a timely basis. The Financial Institution commits to file accurate supplemental information on a timely basis. (Global Head of Correspondent Banking or equivalent), certify that I have read and understood the the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration, that the answers Wolfsberg CBDDQ are complete and correct to my honest belief, and that I have read and understood this declaration on behalf of the Financial Institution.	
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The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. The Financial Institution commits to file accurate supplemental information on a timely basis. I. A 2 1 2 A K H O N I A S L (Global Head of Correspondent Banking or equivalent), certify that I have read and understood the the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of Institution. I. A CHITA DARHIZ MILRO or equivalent), certify that I have read and understood this declaration, that the answers Wolfsberg CBDDQ are complete and correct to my honest belief, and that I have read and understood this declaration, that the answers Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	lo adopting these
I, A 2 12 A K H O N D T A SL (Global Head of Correspondent Banking or equivalent), certify that I have read and understood the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of Institution. I, A CHITA DARHIZ DIMLRO or equivalent), certify that I have read and understood this declaration, that the answers Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	Finance Principles
Institution. In answers provided in this worksherg CBUDU are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of Institution. IN ANALTA PARHIZ DIMLRO or equivalent), certify that I have read and understood this declaration, that the answers I worksherg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.	
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1 2/2 2/1	provided in this
(Signature & Date) 22/08/2024 A Partir & (Signature & Date) 22/08/2024	