

| Financial Institution Name: |  |
|-----------------------------|--|
| Location (Country) :        |  |

| No#       | Question  | Answer |
|-----------|---|--------|
| 1. ENTITY | & OWNERSHIP   |        |
| 1         | Full Legal Name   |        |
|           |   |        |
|           |   |        |
|           |   |        |
| 2         | Append a list of foreign branches which are covered                                       |        |
|           | by this questionnaire   |        |
|           |   |        |
|           |   |        |
| 3         | Full Legal (Registered) Address   |        |
| "         | l uli Legal (Negistereu) Address  |        |
|           |   |        |
|           |   |        |
| 4         | Edi Disease Projects Address (15 different form   |        |
| 4         | Full Primary Business Address (if different from above)                                   |        |
|           | above)  |        |
|           |   |        |
|           |   |        |
| 5         | Date of Entity incorporation/establishment  |        |
|           |   |        |
|           |   |        |
| <u></u>   |   |        |
| 6         | Select type of ownership and append an ownership  |        |
|           | chart if available  |        |
| 6 a       | Publicly Traded (25% of shares publicly traded)   |        |
| 6 a1      | If Y, indicate the exchange traded on and ticker  |        |
|           | symbol  |        |
|           |   |        |
|           |   |        |
| 6 b       | Member Owned/Mutual   |        |
| 6 c       | Government or State Owned by 25% or more  |        |
| 6 d       | Privately Owned   |        |
| 6 d1      | If Y, provide details of shareholders or ultimate   |        |
|           | beneficial owners with a holding of 10% or more   |        |
|           | _   |        |
|           |   |        |
| 7         | % of the Entity's total shares composed of bearer   |        |
| ļ*        | shares  |        |
|           | Sidios  |        |
|           |   |        |
|           | D # 5 # 5   |        |
| 8         | Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)? |        |
| _         |   |        |
| 8 a       | If Y, provide the name of the relevant branch/es which operate under an OBL               |        |
|           | which operate under all OBL   |        |
|           |   |        |
| _         |   |        |
| 9         | Does the Bank have a Virtual Bank License or  |        |
|           | provide services only through online channels?  |        |
| 10        | Name of primary financial regulator/supervisory   |        |
|           | authority   |        |
|           |   |        |
|           |   |        |
| 11        | Provide Legal Entity Identifier (LEI) if available  |        |
|           |   |        |
|           |   |        |
|           |   |        |
| 12        | Provide the full legal name of the ultimate parent (if                                    |        |
| -         | different from the Entity completing the DDQ)   |        |
|           | ,   |        |
|           |   |        |
|           |   | L      |

| 13       | Jurisdiction of licensing authority and regulator of     |          |
|----------|--|----------|
|          | ultimate parent  |          |
|          |  |          |
|          |  |          |
| 1        |  |          |
| 14       | Select the business areas applicable to the Entity       |          |
|          | 1.1  |          |
| 14 a     | Retail Banking   |          |
| 14 b     | Private Banking  |          |
| 14 c     | Commercial Banking                                       |          |
| 14 d     | Transactional Banking                                    |          |
|          | ű  |          |
| 14 e     | Investment Banking                                       |          |
| 14 f     | Financial Markets Trading                                |          |
| 14 g     | Securities Services/Custody                              |          |
| 14 h     | Broker/Dealer  |          |
|          |  |          |
| 14 i     | Multilateral Development Bank                            |          |
| 14 j     | Wealth Management  |          |
| 14 k     | Other (please explain)                                   |          |
|          | (process support)  |          |
| <u> </u> | <u> </u>   |          |
| 15       | Does the Entity have a significant (10% or more)         |          |
| 1        | portfolio of non-resident customers or does it derive    |          |
| 1        | more than 10% of its revenue from non-resident           |          |
| 1        | customers? (Non-resident means customers primarily       |          |
| 1        | resident in a different jurisdiction to the location     |          |
| 1        |  |          |
| 1        | where bank services are provided)                        |          |
| 45 :     | KV mandal that is  |          |
| 15 a     | If Y, provide the top five countries where the non-      |          |
| 1        | resident customers are located.                          |          |
| 1        | 1  |          |
| 1        | 1  |          |
|          | <u>                                       </u>           | <u> </u> |
| 16       | Select the closest value:                                |          |
| 16 a     | Number of employees                                      |          |
|          | . ,  |          |
| 16 b     | Total Assets   |          |
| 17       | Confirm that all responses provided in the above         |          |
| 1        | Section are representative of all the LE's branches.     |          |
| 17 -     | •  |          |
| 17 a     | If N, clarify which questions the difference/s relate to |          |
| 1        | and the branch/es that this applies to.                  |          |
| 1        |  |          |
| Í        | į J  |          |
| L        | <u>                                       </u>           | <u> </u> |
| 18       | If appropriate, provide any additional                   |          |
|          | information/context to the answers in this section.      |          |
| 1        | and anomore in this section.                             |          |
| 1        | 1  |          |
| 1        | 1  |          |
| 2 DDCD   | CTS & SEDVICES   |          |
|          | CTS & SERVICES   |          |
| 19       | Does the Entity offer the following products and         |          |
| 1        | services:  |          |
| 19 a     | Correspondent Banking                                    |          |
| 10 1     | 1637   |          |
| 19 a1    | IfY  |          |
| 19 a1a   | Does the Entity offer Correspondent Banking              |          |
| Í        | services to domestic banks?                              |          |
| 10 -15   | Does the Entity allow domestic bank clients to           |          |
| 19 a1b   | 1  |          |
| L        | provide downstream relationships?                        | <u> </u> |
| 19 a1c   | Does the Entity have processes and procedures            |          |
| 1 -      | in place to identify downstream relationships with       |          |
| 1        | domestic banks?  |          |
| <u> </u> |  |          |
| 19 a1d   | Does the Entity offer Correspondent Banking              |          |
| 1        | services to foreign banks?                               |          |
| 19 a1e   | Does the Entity allow downstream relationships           |          |
| Jaie     |  |          |
|          | with foreign banks?                                      |          |
| 19 a1f   | Does the Entity have processes and procedures            |          |
| l -      | in place to identify downstream relationships with       |          |
| 1        | 1 ' '  |          |
|          | foreign banks?   |          |
| 19 a1g   | Does the Entity offer Correspondent Banking              |          |
| 3        | services to regulated Money Services Businesses          |          |
| 1        |  |          |
|          | (MSBs)/Money Value Transfer Services (MVTSs)?            |          |
| 19 a1h   | Does the Entity allow downstream relationships           |          |
| 1        | with MSBs, MVTSs, or Payment Service Provider            |          |
| 1        | (PSPs)?  |          |
| L        | , ,  |          |
| 19 a1h1  | MSBs   |          |
| 19 a1h2  | MVTSs  |          |
|          |  |          |
| 19 a1h3  | PSPs   |          |
|          |  |          |

| 19 a1i       | Does the Entity have processes and procedures in place to identify downstream relationships with MSBs /MVTSs/PSPs?                          |  |
|--------------|---|--|
| 40.5         |   |  |
| 19 b<br>19 c | Cross-Border Bulk Cash Delivery   |  |
| 19 C         | Cross-Border Remittances  Domestic Bulk Cash Delivery   |  |
| 19 a         | Hold Mail   |  |
| 19 e         | International Cash Letter   |  |
|              | Low Price Securities  |  |
| 19 g         |   |  |
| 19 h<br>19 i | Payable Through Accounts  Payment services to non-bank entities who may   |  |
| 191          | then offer third party payment services to their customers?   |  |
| 19 i1        | If Y , please select all that apply below?  |  |
| 19 i2        | Third Party Payment Service Providers   |  |
| 19 i3        | Virtual Asset Service Providers (VASPs)   |  |
| 19 i4        | eCommerce Platforms   |  |
| 19 i5        | Other - Please explain  |  |
| 19 j         | Private Banking   |  |
| 19 k         | Remote Deposit Capture (RDC)  |  |
| 19 I         | Sponsoring Private ATMs   |  |
| 19 m         | Stored Value Instruments  |  |
| 19 n         | Trade Finance   |  |
| 19 o         | Virtual Assets  |  |
| 19 p         | For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: |  |
| 19 p1        | Check cashing service   |  |
| 19 p1a       | If yes, state the applicable level of due diligence   |  |
| 19 p2        | Wire transfers  |  |
| 19 p2a       | If yes, state the applicable level of due diligence   |  |
| 19 p3        | Foreign currency conversion   |  |
| 19 p3a       | If yes, state the applicable level of due diligence   |  |
| 19 p4        | Sale of Monetary Instruments  |  |
| 19 p4a       | If yes, state the applicable level of due diligence   |  |
| 19 p5        | If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.          |  |
| 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.                                       |  |
| 20 a         | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  |  |
| 21           | If appropriate, provide any additional information/context to the answers in this section.  |  |
| 3. AML, C    | TF & SANCTIONS PROGRAMME  |  |
| 22           | Does the Entity have a programme that sets minimum  |  |
|              | AML, CTF and Sanctions standards regarding the following components:  |  |
| 22 a         | Appointed Officer with sufficient   |  |
| 22 b         | Adverse Information Screening   |  |
| 22 c         | Beneficial Ownership  |  |
| 22 d         | Cash Reporting  |  |
| 22 e         | CDD   |  |
| 22 f         | EDD   |  |
| 22 g         | Independent Testing   |  |
| 22 h         | Periodic Review   |  |
| 22 i         | Policies and Procedures   |  |
| 22 j         | PEP Screening   |  |
| 22 k         | Risk Assessment   |  |
| 22 I         | Sanctions   |  |
|              |   |  |

| 27 Taming and Excellent 28 How many full sine employees are in the Entity's MAL, CTF & Sanctions Deployees are in the Entity's AMA, CTF & Sanctions Deploy approved attested annually by the Body or equivalent Senior or equivalent Senior annually by the Body or equivalent Senior Senior Senior or equivalent Senior Senior Senior or equivalent Senior Seni | 22 m    | Suspicious Activity Reporting  |  |
|--|---------|--|--|
| 22 a many full stime employees are in the Entity's AMU, CTF & Sanctions Compliance (Part AMU, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF & Sanctions policy product at least annually by the Board or equivalent Senior Monagement (Part AMU, CTF, & Sanctions programmer)  25 a Confirm the Board respirate special control of the AMU, CTF, & Sanctions programmer?  26 a FY, provide further details  27 Does the entity use third patries to carry out any components of the AMU, CTF, & Sanctions programmer?  28 a FY, provide further details  29 Confirm that all responses provided at the above Socious are applicated the special of the LES branches Socious are applicated the special of the LES branches Socious are applicated the special of the ABOV CONTROL (Part AMU, CTF, AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the provided annual of the ABOV CONTROL (Part AMU) and the ABOV CONTROL (Part  |         |  |  |
| ANL, CF & Sanctions policy agreement in the Entity's ANL, CF & Sanctions policy approved at steet annually by the Board or equivalent Senior in Cuestion 2.  See the Board receive, was asses, and of balleage regular reporting on the status of the ANL, CF & Sanctions policy approved at steet annually by the Board receive, was seen and or sequivalent policy and the status of the ANL, CF & Sanctions programme?  Board receive, was seen and or sequivalent policy require reporting on the status of the ANL, CF & Sanctions programme?  Board receive, was the Board receive, was seen and or sequivalent policy or components of the ANL, CF & Sanctions programme?  Board Receive and the ANL, CF & Sanctions programme?  Board Receive and the ANL of the Sanctions programme?  Board Receive and the Sanctions of the Sanctions programme?  Board Receive and the Sanctions of the Sanctions programme?  If appropriate, provide any additional information of the Sanctions o |         | · ·  |  |
| s the Entity's AMR. CTF & Sanctions policy approved at alexa annually by the found or equivalent Senior Management Committer? I'M, describe your practice in Oueseion 29.  25 Does the Board receive, assess, and challenge regular reporting on the solute of the AMR. CTF, & Sanctions programme?  26 Does the Entity use third perfies to carry out any out any components of the AMR. CTF, & Sanctions programme?  27 Does the entity have a whilefeldower policy?  28 Ones the entity have a whilefeldower policy?  29 Confere that all responses provided in the above Socioe are representative of all the LEs branches  29 a If appropriate, provide any additional information and the branches that this applies to and the branches that this applies to and the branches that this applies to any out any  |         | How many full time employees are in the Entity's   |  |
| regular reporting on the satus of the AML_CTF, & Sanctions programme?  26  | 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              |  |
| components of the AML, CTF & Sanctions programme?  If Y, provide further details  If Y, provide further details  If Y, provide further details  Confirm that all responses provided in the above Section are representative of all the LES tranches  Section are representative of all the LES tranches  If N, Clarify which questions the difference's relate to and the branch'se that this applies to.  If A, Clarify which questions the difference's relate to and the branch'se that this applies to.  If Appropriate, provide any additional information information context to the answers in this section.  If appropriate, provide any additional information and in | 25      | regular reporting on the status of the AML, CTF, &   |  |
| 27 Does the entity have a whistleblower policy? 28 Confirm that all responses provided in the above Section are representative of all the LEP tranches Section are representative of all the LEP tranches. 28 a If N, darify which questions the difference's relate to and the tranches that this applies to.  29 If appropriate, provide any additional information-context to the answers in this section.  29 If appropriate, provide any additional information-context to the answers in this section.  20 ANTI BRIBERY & CORRUPTION 30 Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and sport bibdry and corruption?  31 Does the Entity have an enterprise wide programme that sets minimum ABC standards?  32 Has the Entity appointed a designated officer or officers with sufficient representative propriative separative to the Entity have adjusted in a propriate to the Entity have adjusted and appropriate to the Entity have adjusted and appropriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted and propriate to the Entity have adjusted ABC programme?  33 Does the Entity have adjusted ABC policy that:  35 Des the Entity have adjusted ABC policy that:  36 Prohibits the giving and receiving of brines? This includes promising, ordering, giving, solicitation or receiving of anything of value, clientify or indirectly, if improperly intended to influence addition or obtain an advertinge.  36 Des the Entity have adjusted to influence addition or obtain an advertinge.  37 Does the Entity have controls in place to monitor the effectiveness of the ABC programme?  38 If If provide the date to when the last ABC EVRA was completed.  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent ri | 26      |  |  |
| Section are representative of all the LE b branches Section are representative of all the LE b branches  18  | 26 a    | If Y, provide further details  |  |
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| completed.  39 Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and   | 38      | Has the Entity's ABC Enterprise Wide Risk Assessment   |  |
| is the net result of the controls effectiveness and the inherent risk assessment?  40 Does the Entity's ABC EWRA cover the inherent risk components detailed below:  40 Potential liability created by intermediaries and  | 38 a    |  |  |
| components detailed below:  40 a Potential liability created by intermediaries and   |         | is the net result of the controls effectiveness and the inherent risk assessment?  |  |
|  |         | components detailed below:   |  |
|  | 40 a    |  |  |

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

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

| 58 e      | Name Screening   |  |
|-----------|--|--|
| 58 f      | Transaction Screening  |  |
| 58 g      | Training and Education   |  |
| 59        | Has the Entity's Sanctions EWRA been completed in the last 12 months?  |  |
| 50 -      |  |  |
| 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  |  |
| 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   |  |
| 62        | Does the Entity verify the identity of the customer?   |  |
| 63        | Do the Entity's policies and procedures set out when   |  |
|           | CDD must be completed, e.g. at the time of onboarding or within 30 days?                                     |  |
| 64        | Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:         |  |
| 64 a      | Customer identification  |  |
| 64 b      | Expected activity  |  |
| 64 c      | Nature of business/employment  |  |
| 64 d      | Ownership structure  |  |
| 64 e      | Product usage  |  |
| 64 f      | Purpose and nature of relationship   |  |
| 64 g      | Source of funds  |  |
| 64 h      | Source of wealth   |  |
| 65        | Are each of the following identified:  |  |
| 65 a      | Ultimate beneficial ownership  |  |
| 65 a1     | Are ultimate beneficial owners verified?   |  |
| 65 b      |  |  |
|           | Authorised signatories (where applicable)  |  |
| 65 c      | Key controllers  |  |
| 65 d      | Other relevant parties   |  |
| 66        | What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?              |  |
| 67        | Does the due diligence process result in customers receiving a risk classification?                          |  |
| 67 a      | If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply: |  |
| 67 a1     | Product Usage  |  |
| 67 a2     | Geography  |  |
| 67 a3     | Business Type/Industry   |  |
| 67 a4     | Legal Entity type  |  |
| 67 a5     | Adverse Information  |  |
| 67 a6     | Other (specify)  |  |
| 68        | For high risk non-individual customers, is a site visit a part of your KYC process?                          |  |
| 68 a      | If Y, is this at:  |  |
| 68 a1     | Onboarding   |  |
| 68 a2     | KYC renewal  |  |
| 68 a3     | Trigger event  |  |
| 68 a4     | Other  |  |
| 68 a4a    | If yes, please specify "Other"   |  |
| 69        | Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?           |  |
| 69 a      | If Y, is this at:  |  |
| 69 a1     | Onboarding   |  |
| 69 a2     | KYC renewal  |  |
|           |  |  |

| 69 a3          | Trigger event  |  |
|----------------|--|--|
| 69 a3<br>70    | Trigger event  |  |
|                | What is the method used by the Entity to screen for Adverse Media/Negative News?   |  |
| 71             | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?   |  |
| 71 a           | If Y, is this at:  |  |
| 71 a1          | Onboarding   |  |
| 71 a2          | KYC renewal  |  |
| 71 a3          | Trigger event  |  |
| 72             | What is the method used by the Entity to screen PEPs?  |  |
| 73             | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? |  |
| 74             | Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?   |  |
| 74 a           | If yes, select all that apply:   |  |
| 74 a1          | Less than one year   |  |
| 74 a2          | 1 – 2 years  |  |
| 74 a3          | 3 – 4 years  |  |
| 74 a4<br>74 a5 | 5 years or more  Trigger-based or perpetual monitoring reviews   |  |
| 74 a5<br>74 a6 | Other (Please specify)   |  |
| 7440           | Outer (Frease specify)   |  |
| 75             | Does the Entity maintain and report metrics on current and past periodic or trigger event due diligence reviews?   |  |
| 76             | From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  |  |
| 76 a           | Arms, defence, military  |  |
| 76 b           | Respondent Banks   |  |
| 76 b1          | If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  |  |
| 76 c           | Embassies/Consulates   |  |
| 76 d           | Extractive industries  |  |
| 76 e           | Gambling customers   |  |
| 76 f           | General Trading Companies  |  |
| 76 g           | Marijuana-related Entities   |  |
| 76 h           | MSB/MVTS customers   |  |
| 76 i           | Non-account customers  |  |
| 76 j           | Non-Government Organisations   |  |
| 76 k           | Non-resident customers   |  |
| 76 I           | Nuclear power  |  |
| 76 m           | Payment Service Providers  |  |
| 76 n           | PEPs   |  |
| 76 o           | PEP Close Associates   |  |
| 76 p           | PEP Related  |  |
| 76 q           | Precious metals and stones   |  |
| 76 r           | Red light businesses/Adult entertainment   |  |
| 76 s           | Regulated charities  |  |
| 76 t           | Shell banks  |  |
| 76 u           | Travel and Tour Companies  |  |
| 76 v           | Unregulated charities  |  |
| 76 w           | Used Car Dealers   |  |
| 76 x<br>76 y   | Virtual Asset Service Providers Other (specify)  |  |
| 77             | If restricted, provide details of the restriction  |  |
| 78             | Does EDD require senior business management and/ or compliance approval?   |  |

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

| 93       | Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:  |  |
|----------|---|--|
| 00 -     | '   |  |
| 93 a     | FATF Recommendation 16  |  |
| 93 b     | Local Regulations   |  |
| 93 b1    | If Y, specify the regulation  |  |
| 93 с     | If N, explain   |  |
| 94       | Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?  |  |
| 95       | Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?   |  |
| 95 a     | If Y, does the Entity have procedures to include<br>beneficiary address including country in cross<br>border payments?  |  |
| 96       | Confirm that all responses provided in the above Section are representative of all the LE's branches  |  |
| 96 a     | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  |  |
| 97       | If appropriate, provide any additional information/context to the answers in this section.  |  |
| 10. SANC | TIONS   |  |
| 98       | Does the Entity have a Sanctions Policy approved by   |  |
|          | management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?   |  |
| 99       | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? |  |
| 100      | Does the Entity have policies, procedures or other 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?                                |  |
| 101      | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?   |  |
| 102      | What is the method used by the Entity for sanctions screening?  |  |
| 102 a    | If 'automated' or 'both automated and manual' selected:   |  |
| 102 a1   | Are internal system of vendor-sourced tools used?   |  |
| 102 a1a  | If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?   |  |
| 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)   |  |
| 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?  |  |
| 104      | 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?   |  |
|----------------|--|--|
| 106            | Select the Sanctions Lists used by the Entity in its sanctions screening processes:  |  |
| 106 a          | Consolidated United Nations Security Council Sanctions List (UN)   |  |
| 106 b          | United States Department of the Treasury's Office of Foreign Assets Control (OFAC)   |  |
| 106 с          | Office of Financial Sanctions Implementation HMT (OFSI)  |  |
| 106 d          | European Union Consolidated List (EU)  |  |
| 106 e          | Lists maintained by other G7 member countries  |  |
| 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  |  |
| 107 b          | Transactions   |  |
| 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? |  |
| 109            | Confirm that all responses provided in the above Section are representative of all the LE's branches   |  |
| 109 а          | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.   |  |
| 110            | If appropriate, provide any additional information/context to the answers in this section.   |  |
| 11. TRAININ    | IG & EDUCATION   |  |
| 111            | Does the Entity provide mandatory training, which includes:  |  |
| 111 a          | Identification and reporting of transactions to government authorities   |  |
| 111 b          | Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered  |  |
| 111 c          | Internal policies for controlling money laundering, terrorist financing and sanctions violations   |  |
| 111 d          | New issues that occur in the market, e.g. significant regulatory actions or new regulations  |  |
| 111 e          | Conduct and Culture  |  |
| 111 f          | Fraud  |  |
| 112            | Is the above mandatory training provided to:   |  |
| 112 a          | Board and Senior Committee Management  |  |
| 112 b          | 1st Line of Defence  |  |
| 112 c<br>112 d | 2nd Line of Defence  3rd Line of Defence   |  |
| 112 d          | Third parties to which specific FCC activities have been outsourced  |  |
| 112 f          | Non-employed workers (contractors/consultants)   |  |
| 113            | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?  |  |
| 114            | Does the Entity provide customised training for AML, CTF and Sanctions staff?  |  |
| 114 a          | If Y, how frequently is training delivered?  |  |
| 115            | Confirm that all responses provided in the above   |  |
|                | Section are representative of all the LE's branches  |  |

| ### 18 A DEAD ### 18 ADDRESS AND ADDRESS A |           |  |  |
|--|-----------|--|--|
| Information/context to the answers in this section.  | 115 a     |  |  |
| Information/context to the answers in this section.  |           |  |  |
| 117 Does the Entity have a program with ents based Outlief Assurance programs for financial crime (separats from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (separate from the independent Audit function)?  119 Sociolismo Testing process (separate from the independent Audit function)?  110 Confirm that all responses provided in the above Sociolismo are impressed that the special in the above Sociolismo are impressed that it is applient to an application of the Entity have an internal audit function, a testing function are supervisorate, growther any additional information/context to the answers in this section.  119 a In addition to inspections by the government supervisorate guidants, does the Entity have an internal audit function, a testing function or other management and the function and the Entity have an internal audit function, a testing function or other process and practices on a regular basis?  110 Confirm that the Testing of the Audit CTF, ABC, function and any additional information or other process and any additional information and the Audit CTF, ABC, fraud and Sandrions programment by the following.  111 Separate from the Entity Assurance and Sandrions programment by the following.  112 Design the Internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  113 Design the internal audit function or other independent third party cover the following areas:  114 Design the internal audit function or other independent t | 116       |  |  |
| Cuality Assurance programme for financial crime (expanse from the independent Audit function)?  118 Does the Entity have a program wide risk based Compliance Testing process (expanse from the independent Audit function)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches  119 If appropriate, provide any additional information content to another than applies to and the branches that this applies to.  120 If appropriate, provide any additional information/context to the answers in this section.  121 Individion to inspections by the government supervisor/regulation, does the Entity have an internal audit function, a setting function or other independent third party, or both, that assesses FCC AML CTF. ABC, Fraud and Sanctions proteins and sections programme by the following:  122 How then is the Entity audition or its AML CTF. ABC, Fraud and Sanctions proteins and practices on a regular bases?  122 External Third Party  123 Does the Initianal audit function and Sanctions policy and procedure to third party cover the following areas:  123 AMC CTF. ABC, Fraud and Sanctions policy and procedures.  123 AMC CTF. ABC Fraud and Sanctions policy and procedures.  123 AMC CTF. ABC Fraud and Sanctions policy and procedures.  124 External Third Party  125 External Third Party  126 External Third Party  127 American Audit Department  128 Control of the CTF. ABC Fraud and Sanctions policy and procedures.  129 AMC CTF. ABC Fraud and Sanctions policy and procedures.  129 AMC CTF. ABC Fraud and Sanctions policy and procedures.  129 AMC CTF. ABC Fraud and Sanctions policy and procedures.  129 Control Third Party  120 Control Third Party  121 Report of the Initian Sanctions.  122 Control Third Party  123 AMC Control Third Party  124 A Representation of the Initian Sanctions.  125 A Tailor Sanction Sanction Sanctions.  126 Confirm that it responses provides in the above and the branches that this applies to.  127 Control Third Party and dedictional information/context to the answe | 12. QUALI | TY ASSURANCE /COMPLIANCE TESTING   |  |
| Coeparate from the independent Austi Rundon/?  |           |  |  |
| Compliance Testing process (separate from the independent Audit Introduction?)?  119 Confirm that all responses provided in the above Section are representative of all the LES branches  119 a If N, Catrify which questions the difference's relate to and the branchies that this applies to.  120 If appropriate, provide any additional information/context to the answers in this section.  121 If appropriate, provide any additional information/context to the answers in this section.  122 If a laddition to inspections by the government supervisors/regulators, does the Entity have an intend and util function a Sesting function or other independent intends and util function a Sesting function or other independent intends and util function a Sesting function or other independent intends and sentitions propriates and practices on a regular basis?  122 Power from a the Entity sudded on its AMIL CTF, ABC, Frout and Sentitions programm by the following.  123 Intended Audit Dependment.  124 Intended The Performance of the independent into a propriate programm by the following.  125 Intended Audit Dependment.  126 Consensation and Sentitions provides and productures and productures.  127 Intended Audit Dependment.  128 A Report The Performance of the independent into a provider and productures.  129 Intended Audit Dependment.  120 Consensation and the Audit Intended |           | (separate from the independent Audit function)?  |  |
| Section are representative of all the LE's branches  |           | Compliance Testing process (separate from the  |  |
| and the branchies that this applies to.    Tappropriate, provide any additional information/context to the answers in this section.    Table   |           | Section are representative of all the LE's branches  |  |
| information/context to the answers in this section.  13. AUDIT  121 In addition to inspections by the government superviscos/regulators, does the Entity have an independent full regulatory, or both, that inseases FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  123 In External Third Party  123 Deside in third Party  124 Deside in third Party  125 Deside in third Party  126 Deside in third Party  127 Deside in third Party  128 Deside in third Party  129 Deside in third Party  120 Deside in third Party  120 Deside in third Party  121 Deside in third Party  122 Deside in third Party  123 Deside in third Party  124 Deside in third Party  125 Deside in third Party  126 Deside in third Party  127 Deside in third Party  128 Deside in third Party  129 Deside in third P | 119 a     |  |  |
| In addition to inspections by the government   | 120       |  |  |
| In addition to inspections by the government   | 13. AUDIT |  |  |
| Fraud and Sanctions programme by the following:  122 b   |           | 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 |  |
| External Third Party   Does the Internal audit function or other independent third party over the following areas:   133 a   | 122       |  |  |
| 123 Does the internal audit function or other independent third party cover the following areas: 123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filling 123 h Technology 123 i Transaction Monitoring 123 i Transaction Screening including for sanctions 123 k Transing & Education 123 l Transaction Screening including for sanctions 123 k Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, Clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   | 122 a     | Internal Audit Department  |  |
| third party cover the following areas:  AML, CTF, ABC, Fraud and Sanctions policy and procedures  23 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  23 c Governance  23 d KYC/CDD/EDD and underlying methodologies  123 e Name Screening & List Management  123 f Reporting/Metrics & Management Information  23 g Suspicious Activity Filling  123 h Technology  123 h Transaction Monitoring  123 j Transaction Monitoring  123 j Transaction Screening including for sanctions  123 l Training & Education  Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 a Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.   | 122 b     | External Third Party   |  |
| procedures Enterprise Wide Risk Assessment 123 b Enterprise Wide Risk Assessment 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 h Technology 123 i Transaction Monitoring 123 i Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible  |           | third party cover the following areas:   |  |
| 123 c Governance 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible   |           | procedures   |  |
| 123 d KYC/CDD/EDD and underlying methodologies 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible   |           |  |  |
| 123 e Name Screening & List Management 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible  |           |  |  |
| 123 f Reporting/Metrics & Management Information 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible   |           | , ,  |  |
| 123 g Suspicious Activity Filing 123 h Technology 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible  |           |  |  |
| 123 i Transaction Monitoring 123 j Transaction Screening including for sanctions 123 k Training & Education  124   | 123 g     |  |  |
| 123 j Transaction Screening including for sanctions 123 k Training & Education 123 l Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? 125 Confirm that all responses provided in the above section are representative of all the LE's branches 125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk? 128 Does the Entity have a dedicated team responsible   | 123 h     | Technology   |  |
| Training & Education  Other (specify)  Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  It appropriate, Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible   |           |  |  |
| 124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  14. FRAUD  17 Does the Entity have policies in place addressing fraud risk?  18 Does the Entity have a dedicated team responsible   |           |  |  |
| tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  126 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. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   |           | -  |  |
| 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.  It appropriate, provide any additional information/context to the answers in this section.  | 124       | tracked to completion and assessed for adequacy  |  |
| 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.  Id. FRAUD  Does the Entity have policies in place addressing fraud risk?  Does the Entity have a dedicated team responsible  | 125       |  |  |
| information/context to the answers in this section.  14. FRAUD  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   | 125 a     | If N, clarify which questions the difference/s relate to   |  |
| 127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   | 126       |  |  |
| 127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible   | 14. FRAL  | JD   |  |
|  |           | Does the Entity have policies in place addressing fraud risk?  |  |
|  | 128       |  |  |

| 129   | Does the Entity have real time monitoring to detect fraud?   |   |  |  |
|---|--|---|--|--|
| 130   | Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID? |   |  |  |
| 131   | Confirm that all responses provided in the above section are representative of all the LE's branches   |   |  |  |
| 131 a   | If N, clarify which questions the difference/s relate to and the branch/es that this applies to.   |   |  |  |
| 132   | If appropriate, provide any additional information/context to the answers in this section.   |   |  |  |
|   |  |   |  |  |
| Declarati   | on Statement   |   |  |  |
| Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) |  |   |  |  |
| (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 holds accounts.  |  |   |  |  |
| The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its 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 adopting these standards.   |  |   |  |  |
| The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. 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, (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that 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 the Financial Institution.   |  |   |  |  |
| I,<br>Wolfsberg C   |  | valent), certify that I have read and understood this declaration, that the answers provided in this authorised to execute this declaration on behalf of the Financial Institution. |  |  |
|   | (Signature & Date  | 3)  |  |  |
|   | (Signature & Date  | 3)  |  |  |
| 1   |  |   |  |  |